

## PRIVACY POLICY

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### Data Controller

Name: Smartsol Engineering Korlátolt Felelősségű Társaság

Registered seat: 8000 Székesfehérvár, Kapos utca 5..

Mailing address, complaint management: 8000 Székesfehérvár, Kőrösi tér hrsz 12570/34

E-mail: [hello@smartsol.hu](mailto:hello@smartsol.hu)

Phone: +36309603799

Web: [www.smartsol.hu](http://www.smartsol.hu)

### Hosting service provider

Name: RGB Computer Kft.

Mailing address: 8000 Székesfehérvár, Palotai út 8/b fszt/6

E-mail:

WEB: [www.rgbcomputer.hu](http://www.rgbcomputer.hu)

### Information on the use of cookies

#### What is a cookie?

Upon visiting the website, the Data Controller uses cookies. A cookie is an information package consisting of letters and numbers sent to your browser by our website with the purpose of saving certain settings, facilitate the use of our website and help us collect relevant, statistical information of our visitors. Some cookies do not contain personal information and are not suitable for identifying individual users, but some cookies contain a unique identifier, that is, a secret number sequence generated randomly, which will be stored by your device and therefore will ensure your identification. The operational duration of each cookie is included in the relevant description.

#### Legal background and legal grounds of cookies:

The legal basis of processing is your consent pursuant to Article 6(1)(a) of the Regulation..

#### Main characteristics of the cookies used by the website:

##### Strictly necessary cookies:

If you do not accept the use of cookies, certain functions will not be available to you

##### Cookies strictly necessary for operation

## PRIVACY POLICY

---

These cookies are essential for the use of the website and enable the use of the basic functions of the site. In the lack of these cookies several functions of the website will not be available to you. The lifetime of these cookies is limited exclusively to the duration of the session.

**Session cookies:** These cookies store the location of the user, the language of the browser, and the currency of the payment. Their lifetime lasts until the browser is closed or 2 hours at maximum.

**Age-restricted content cookies:** These cookies record the fact of the approval to age-restricted content and that the person concerned is over 18 years old, their lifetime lasts until the browser is closed.

**Recommended product cookies:** It records the list of products intended to be recommended, at the "Recommend to a friend" function. Their lifetime is 60 days.

**Mobile version, design cookies:** It detects the device used by the visitor and switches to full view on mobile. Their lifetime is 365 days.

**Cookie acceptance cookies:** Upon arrival to the site, you accept the statement on the storage of cookies in the appropriate window. Their lifetime is 365 days.

**Exit #2 cookies:** Logs the visitor out after 90 days according to the #2 option. Their lifetime is 90 days.

**Backend identifier cookies:** Identifier of the backend server that serves the site. Their lifetime lasts until the browser is closed.

### **Statistic cookies:**

**Cookies for improving user experience:** These cookies collect information of the way the user uses the website, for example which pages does the user visit most frequently or what error messages do they receive from the website. These cookies do not collect information identifying the visitor, that is, they work with completely general, anonymous information. They use the data extracted from such information to improve the performance of the website. The lifetime of these cookies is limited exclusively to the duration of the session.

**Referer cookies:** They record the external websites from which the visitor arrived to the site. Their lifetime lasts until the browser is closed.

You can find further information about deleting cookies at the following links:

Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>

Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Mozilla: <https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Chrome: <https://support.google.com/chrome/answer/95647>

Edge: <https://support.microsoft.com/hu-hu/help/4027947/microsoft-edge-delete-cookies>

## PRIVACY POLICY

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### **Data processed for the purpose of concluding and performing the contract**

In order to conclude and performing the contract, several cases of data processing may occur. We hereby inform you that data processing related to complaint management and administration related to guarantee rights will only be carried if you exercise one of the said rights. If you do not purchase via the webshop but arrive only as a visitor, then the provisions on data processing for marketing purposes may apply to you if you give consent to us for marketing purposes. Data processing activities for the purpose of concluding and performing the contract in detail are:

#### **Data processed**

The data provided by you upon contacting us.

#### **Period of the data processing**

We only process the data until the end of the contact

#### **Legal basis for the data processing**

Your voluntary consent given to the Data Controller by contacting us. [Data processing pursuant to Article 6(1)(a) of the Regulation]

### **Data processed in relation to the verifiability of the consent**

Upon registration, placing an order, or subscription to newsletter, the IT system stores the IT data related to the consent for evidence purposes.

#### **Data processed**

The date of the consent and the data subject's IP address.

#### **Period of the data processing**

Due to compliance with legal provisions, the consent must be verifiable later, therefore, the data are stored for the limitation period following the termination of data processing.

#### **Legal basis for the data processing**

This obligation is prescribed by Article 7(1) of the Regulation [Data processing pursuant to Article 6(1)(c) of the Regulation]

### **Data processing related to sending newsletters**

Data processing is carried out for the purpose of sending newsletters.

#### **Data processed**

Name, address, e-mail address, phone number

## PRIVACY POLICY

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### Period of the data processing

Until the withdrawal of the data subject's consent.

### Legal basis for the data processing

Your voluntary consent given to the Data Controller by subscribing to the newsletter. [Data processing pursuant to Article 6(1)(a) of the Regulation]

### Additional data processing activities

If the Data Controller intends to carry out any further data processing activities, it will provide prior information on the actual circumstances of the data processing (legal background and legal basis of the data processing, the scope of the processed data, the period of the data processing).

### Recipients of personal data

### Activities of data processors for storing personal data

**Name of the data processor:** RGB Computer Kft.

**Contact details of the data processor:**

**Phone number:** +36 30 908 1144

**E-mail address:** gimesi@rgbcomputer.hu

**Registered seat:** 8000 Székesfehérvár Palotai út 8/b fszt. 6.

**Web:** www.rgbcomputer.hu

Az Adatfeldolgozó az Adatkezelővel kötött szerződés alapján a személyes adatok tárolását végzi. A személyes adatok megismerésére nem jogosult.

### Activities of data processors related to sending newsletters

**Name of the company operating the newsletter system:** RGB Computer Kft.

**Phone number:** +36 30 908 1144

**E-mail address:** gimesi@rgbcomputer.hu

**Registered seat:** 8000 Székesfehérvár Palotai út 8/b fszt. 6.

**Web:** www.rgbcomputer.hu

Az Adatfeldolgozó az Adatkezelővel kötött szerződés alapján közreműködik a hírlevelek kiküldésében. E nnek során az Adatfeldolgozó az érintett nevét és e-mail címét a hírlevélküldéshez szükséges mértékben kezeli

### Your rights in the course of the data processing

## PRIVACY POLICY

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Within the period of data processing, you are entitled to the following rights pursuant to the provisions of the Regulation:

- right to withdraw consent
- access to personal data and information related to data processing
- right to rectification
- restriction of data processing,
- right to erasure
- right to object
- right to data portability.

If you wish to exercise your rights, it will involve your identification, and the Data Controller must necessarily communicate with you. Therefore, for the purpose of identification, it will be necessary to provide personal data (but only your data already processed by the Data Controller can serve as the basis of identification), and your complaints as regards data processing will be available in your email account within the period specified in this Privacy Notice regarding complaints. If you have been our customer and you wish to identify yourself for the purpose of complaint handling or guarantee management process, please enter your order ID as well for identification. That way we can identify you as our customer. The Data Controller will respond to complaints as regards data processing within 30 days at the latest.

### **Right to withdraw consent**

You have the right to withdraw your consent to data processing at any time, in which case the data provided will be erased from our system. However, please note that in the case of an order that has not yet been fulfilled, the withdrawal of consent may result in us not being able to complete the delivery of your order. In addition, if the purchase has already been completed, based on the accounting regulations, we cannot erase the date related to invoicing from our systems, and if there is any remainder amount unpaid by you to us, we can process your data even in the event of the withdrawal of your consent based on the legitimate interest in debt collection.

### **Access to personal data**

You have the right to obtain from the Data Controller confirmation as to whether your personal data are being processed, and where that is the case, you have the right to

- a gain access to the processed personal data, and
- a receive information from the Data Controller on the following:

the purposes of data processing; the categories of your personal data processed; information on the recipients or categories of recipients to whom the personal data have been or will be disclosed; the

## PRIVACY POLICY

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envisaged period of the processing of personal data or, if that is not possible, the criteria used to determine that period; the existence of your right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing

the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

The purpose of exercising these rights may be aimed at establishing and verifying the lawfulness of data processing, therefore, in case of multiple requests for information, the Data Controller may charge a fair fee in exchange for providing the information. Access to personal data is ensured by the Data Controller by sending you the processed personal data and information by email after your identification. If you have registered, we provide access so that you can view and check your personal data by logging into your user account. Please indicate in your request that you ask for access to personal data or information on data processing

### **Right to rectification**

You have the right to obtain from the Data Controller without delay the rectification of inaccurate personal data concerning you..

### **Right to the restriction of data processing**

You have the right to obtain from the controller restriction of processing where one of the following applies:

the accuracy of the personal data is contested by you, for a period enabling the Data Controller to verify the accuracy of the personal data, and if the accurate data can be immediately established, then no restriction will take place; the data processing is unlawful and you oppose the erasure of the personal data for any reason (for example because the data are necessary for the possible assertion of a claim) and requests the restriction of their use instead; the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims, or if you have objected to the data processing but the legitimate interest of the Data Controller may also serve as grounds for it, the data processing must be restricted until it can be established whether the legitimate grounds of the Data Controller override the legitimate grounds referred to by you.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

## PRIVACY POLICY

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You will be informed by the Data Controller before the restriction of processing is lifted (at least 3 business days before the restriction is lifted).

### **Right to erasure – right to be forgotten**

You have the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay where one of the following grounds applies:

the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Data Controller; you withdraw your consent on which the processing is based and there is no other legal ground for the processing;

you object to the processing based on legitimate interest and there are no overriding legitimate grounds (that is, legitimate interest) for the processing, the personal data have been unlawfully processed by the Data Controller where that was established on the basis of the complaint, the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject.

Where the Data Controller, based on any lawful ground, has made the personal data public and is obliged to erase the personal data due to any of the above grounds, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other data controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data. The erasure shall not apply to the extent that processing is necessary: for exercising the right of freedom of expression and information; or compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject (data processing in the framework of invoicing is one of those cases, as the retaining of the invoice is prescribed by law), or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller; for the establishment, exercise or defence of legal claims (e.g., if the Data Controller has any claims against you which has been not fulfilled yet, or there is undergoing complaint management process).

### **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests. In such case, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

### **Right to data portability**

## PRIVACY POLICY

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If the data processing is carried out in an automated way or if the data management is based on your voluntary consent, you have the right to ask the Data Controller for the data you provided to the Data Controller, which the Data Controller will send in xml, JSON or csv format at your disposal, and, if this is technically feasible, you can request that the Data Controller forward the data in this form to another data controller.

### Automated decision-making

You have the right not to be subject to a decision which is based solely on automated processing (including profilin) and which produces legal effects concerning you or similarly significantly affects you. In these cases, the Data Controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and to contest the decision.

### The above shall not apply if the decision:

- is necessary for the conclusion and performance of the contract between you and the Data Controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or

is based on your explicit consent.

## Reporting to the Data Protection Registration System

Pursuant to the Privacy Act, the Data Controller must report its certain data processing activities to the data protection registration system. This reporting obligation was terminated on 25 May 2018.

## Data security measures

The Data Controller declares that it has taken appropriate security measures in order to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, as well as against becoming inaccessible due to changes in the technology used. The Data Controller will do everything within its organizational and technical capabilities to ensure that its Data Processors also take appropriate data security measures when working with your personal data.

## Remedies

If, in your opinion, the Data Controller has violated a legal provision relating to data processing or has not fulfilled any of your requests, then in order to terminate alleged unlawful data processing, you can initiate the investigative procedure of the Hungarian National Authority for Data Protection and Freedom of Information (mailing address: H-1363 Budapest, Pf. 9., e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), phone numbers: +36 (30) 683-5969 +36 (30) 549-6838; +36 (1) 391 1400). We would also like to inform you that in the



## PRIVACY POLICY

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event of a violation of the legal provisions on data processing, or if the Data Controller has not fulfilled any of your requests, you may file a civil lawsuit against the Data Controller in court.

### Amendment of the Privacy Policy

The Data Controller reserves the right to modify this data management information in a way that does not affect the purpose and legal basis of data processing. By using the website after the amendment enters into force, you accept the amended Privacy Notice.

If the Data Controller wishes to carry out further data processing in relation to the collected data for a purpose other than that of their collection, it will inform you, before commencing any further data processing, of the purpose of the data processing and the information on the following:

the envisaged period of the processing of personal data or, if that is not possible, the criteria used to determine that period; the existence of your right to request from the Data Controller access to, rectification or erasure of personal data or restriction of processing of personal data concerning you, or to object to such processing in the case of data processing on the grounds of legitimate interest, or to request ensuring data portability in the case of data processing on the grounds of consent or contractual relationship; in the case of data processing on the grounds of consent, that you may withdraw your consent at any time, the right to lodge a complaint with a supervisory authority; whether the provision of personal data is based on legislation or a contractual obligation or is a prerequisite for concluding a contract, as well as whether you are obliged to provide personal data, and what possible consequences the failure to provide data may have; the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you

The data processing may only be commenced thereafter, and, in the case of data processing on the grounds of consent, your consent will also be required to the data processing in addition to the provision of the above information.