

PRIVACY POLICY

The purpose of this Privacy Policy is that, **Bálint Gábor Tirpák, sole proprietor** (registered office: 2040 Budaörs, Csap utca 3/2., registration number: 52559031, tax number: 74203460-1-33, international tax number: HU74203460, electronic availability: info@kitsimono.hu, telephone contact: +36 30 333 0219) by complying with my obligation under Article 12 of Regulation (EU) 2016/679, I shall provide a concise, easily accessible, clear and comprehensible language for my data management and data protection activities for you, as a visitor to my website and webshop available at <https://shop.kitsimono.hu/>

1. PRINCIPLES, PERSONAL OF DATA MANAGER AND DATA PROCESSOR

In my data management activities, I follow the following principles:

(a) the principle of "legality, fairness and transparency": I treat personal data lawfully and fairly and transparently for you.

(b) 'purpose limitation': personal data are only collected for specified, explicit and legitimate purposes and not treated in a way incompatible with the purposes.

(c) The principle of "data saving": the personal data that I collect and manage are relevant and relevant to the purposes of the data management and are limited to what is necessary.

(d) The principle of "accuracy": I will take all reasonable measures to ensure that the data I manage are accurate and, where necessary, kept up to date, erase or correct inaccurate personal data immediately.

(e) 'restricted storage' principle: I store personal data in a form that can only be identified for the time necessary to achieve the purposes for which personal data are processed.

(f) "integrity and confidentiality": I shall ensure that personal data are adequately protected by appropriate technical and organizational measures against unauthorized or unlawful handling, accidental loss, destruction or damage of data.

The basics claims of data management in general:

I may treat your personal data on a different legal basis depending on the type of service you uses and provide your personal information, but only the personal information provided by you, otherwise I do not collect personal information about you. The legal basis for the processing of personal data may be:

- a) Your prior informed and voluntary contribution;
- b) data processing may be necessary for the performance of a contract with you;
- c) in some cases, your data management is based on legal requirements and is mandatory;
- d) or, in some cases, your personal data are of legitimate interest to me or to third parties, such as the operation, development and security of my website, webshop.

Contact information:

Your personal data is managed by **Bálint Gábor Tirpák individual entrepreneur as data manager:**

- head office: 2040 Budaörs, Csap utca 3/2.
- website: <https://shop.kitsimono.hu/>
- postal address: 2040 Budaörs, Csap utca 3/2
- my phone number: +36 30 333 0219
- my email address: info@kitsimono.hu
- tax number: 74203460-1-33
- Community tax number: HU74203460

- registration number: 52559031

Legislation governing my activity:

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the management of personal data of natural persons (hereinafter referred to as "GDPR")

- CXII of 2011 on Information Self-Determination and Freedom of Information; (hereinafter referred to as "Infotv.")

- Act V of 2013 on the Civil Code (hereinafter referred to as the Civil Code)

- 2001 CVIII on certain aspects of electronic commerce services and information society services; ("Eker tv")

- Act C of 2003 on Electronic Communications ("the Ehtv.")

- the 1997 CLV on Consumer Protection; ("Fgytv.")

- Act XLVIII of 2008 on the Essential Conditions and Certain Limitations of Economic Advertising Activities; (hereinafter referred to as Grtv.)

- Act C of 2000 on Accounting (hereinafter referred to as "the Act")

In addition to me, your personal information is available to:

For the provision of some services, fulfillment of obligations, and for your convenience, I use third-party persons who can get to know your data ("data processors" or stand-alone data controllers / external service providers). These third parties may also carry out data management activities.

- PIRN Information Technology and Trade Limited Company (headquarters: 1193 Budapest, Bookkötő utca 49, e-mail: info@pirin.hu, company registration number: 01-09-728005, tax number: 13295969-2-43, hereafter: "Hosting provider")

- Adóvalló Tax Advisor Consulting and Service Limited Company (company registration number: 04-09-010871, tax number: 23414875-2-04, registered office: 5500 Gyomaendrőd, Csokonai utca 29, hereinafter referred to as "Accountant").

- GLS General Logistics Systems Hungary Packaging Logistics Ltd. (registered office: 2351 Alsónémedi, GLS Eu-Rópa utca 2, e-mail address: info@glshungary.com, company registration number: 13-09-111755, tax number: 12369410- 2-44, hereinafter referred to as 'Courier Service')

- Google LLC (1600 Amphitheater Parkway, Mountain View, CA 94043, United States of America, hereinafter referred to as Google)

- OTP Bank Plc. (Registered office: 1051 Budapest, Nádor utca 21, hereinafter referred to as "OTP Bank")

2. GENERAL DATA MANAGEMENT

In this section you will find information on which personal data you manage in some of my activities, for what purpose, for what period, and on the legal basis for my activities involving this data management.

2.1 Ordering from a webshop on shop.kitsimono.hu

There is no need to register for ordering products, you cannot register on the website. You can enter the data after the product has been added to the cart. When you order a product, the data you provide will be sent to you after the product order has been finalized (by clicking on the 'Submit Order' button). In the case of a credit card payment, the details of the bankcard and the card payment transaction are handled by OTP Bank, and I do not collect or manage the related data.

data processing is necessary to fulfill your contract or legal obligations to me [GDPR Article 6 (1). b) and c)]

The purpose of data management is:	to create, conclude, modify, monitor the performance of the contract for the products I distribute, and to invoice the resulting fees, and to enforce the related claims. The purpose of managing the e-mail address is to fulfill the legal obligation by Ekertv. Article 6 (2) (sending confirmation e-mail).
Legal basis for data processing:	data processing is necessary to fulfill your contract or legal obligations to me [GDPR Article 6 (1). b) and c)]
The range of data processed is:	surname, first name, e-mail address, shipping address, billing address, tele-number, details of your purchases (product, quantity, price, date).
Duration of data processing:	data are processed from the execution of the order to the end of the general five-year limitation period for civil law (Section 6:22 of the Civil Code), after which I shall delete it. Invoices issued during product ordering are invoiced by Stv. Pursuant to Section 169 (1) and (2), I am obliged to keep it for 8 years.
Recipients of personal data:	the order details are stored electronically on the hosting provider's server, in the mysql database in the Integrity server room, Hungary. For courier services, I only provide the information necessary to deliver the product, including your name, shipping address, e-mail address, telephone number. The transfer of your name and shipping address to the delivery of the product, the e-mail address and the telephone number are required for contacting the delivery, in particular the specific time point of delivery. The invoice issued to you during the ordering will be handed over to the Accountant.

2.2 Data management in consumer complaint handling

You may apply for a warranty and / or warranty claim in respect of your rights under the law in respect of the products you purchase from me, and you may use the 45/2014. (II. 26.) Government Decree. Your complaint may also be sent by e-mail to info@kitsimono.hu or by post on +36 30 333 0219 by telephone.

The purpose of data management is:	to fulfill and manage the claims reported on the products marketed on the basis of statutory proprietary obligation obligations, to respond to other complaints or requests for information.
Legal basis for data management:	data management is necessary for the performance of the contract concluded with you or the relevant legal obligation (Section 17 / A-C of the Fgytv.). [GDPR Article 6 (1)] b) and c)]
The range of data processed is:	The range of data processed is surname, first name, e-mail address, order number, and other information provided by you during complaint handling.

Duration of data management:	Duration of data management: complaints received (warranty, warranty claim, claim for damages, cancellation notice, etc.) are dealt with by the end of the general five-year limitation period for civil law (Section 6:22 of the Civil Code) and then deleted. The 19/2014. (IV. 29.) According to Section 4 (6) of the NGM Decree, I have to keep the record of your warranty or warranty claim for 3 years from the date of its acceptance.
Addressees of personal data:	Addressees of personal data: I forward the data collected in the course of consumer complaint handling to the authority / court if necessary. I do not record the phone call, the complaints written in e-mail are stored on the server of the Hosting Provider in electronic form.

2.3 Data management when visiting the shop.kitsimono.hu website

Shop.kitsimono.hu can automatically collect data by visiting it. The data is collected using cookies, which can be read in more detail in Chapter 3 of this Data Management Guide.

The purpose of data management is:	to ensure the proper and high-quality operation of the website, to control and improve the quality of our services, to identify malicious attacks on the homepage, to measure attendance, and for statistical purposes.
The legal basis for data management:	my legitimate interest in ensuring the proper and safe functioning of the website and in obtaining statistical data on the use of the website [Article 6 (1) GDPR].]. The legal basis for the use of certain cookies is your consent (Article 6 (1) GDPR. a)]
Range of managed data:	IP address, date of visit, details of visited sub-pages, type of operating system and browser you are using, device type (such as desktop, tablet, phone), location (country, city)
Duration of data management:	logging of the data is performed automatically by the website and is maintained for the periods specified in Chapter 3 of this Data Protection Prospectus.
Recipients of personal data:	the data is recorded on the server of the Hosting Provider in electronic form. Google collects data when using Google Analytics.

3. USE OF COOKIE (COOKIE-K)

In general, about the use of cookies

Cookies are small data files (letter and number information packages) that are sent to your computer via the shop.kitsimono.hu website, which are saved and stored by your web browser. The purpose of using a cookie is to save certain settings, facilitate the use of the website, and help to gather relevant statistical information about visitors to the website. Some cookies do not contain personal information and are not suitable for identifying an individual user; however, some of them contain a unique identifier that is stored on your computer (or other device) to identify you.

Most commonly used web browsers (Chrome, Firefox, etc.), by default, accept and allow cookies (cookies), but it is up to you to refuse or disable them by changing your browser settings, or you you can also delete stored cookies on your computer. For more information on the use of cookies, see the "Help" menu of each browser.

There are cookies that do not require your prior consent. These are brief information about our website at the start of your first visit, such as authentication, multimedia player, workload balancing, user interface customization session cookies, and user-centric security cookies.

Cookies used by the shop.kitsimono.hu website:

Marketing Cookies: I use these cookies to track visitors' website activity. The goal is to publish relevant ads to you, which will make the Site even more valuable to content publishers and third-party advertisers.			
Name	Description	Expiry	Type
NID (google.com)	This cookie registers a unique identifier that identifies the device of the returning user. This identifier can be used for targeted ads.	6 months	HTTP
rc::a	The cookie limits the number of times that the ad content is displayed to the user. The purpose of the cookie is to ensure the relevance of the video ad to that visitor.	durable	HTML
rc::b (google.com)	The cookie limits the number of times that the ad content is displayed to the user. The purpose of the cookie is to ensure the relevance of the video ad to that visitor.	session cookie	HTML
rc::c (google.com)	Not named	session cookie	HTML
rc::d1548670415343-39315454 (google.com) durable HTML	Not named.	Not named.	HTML

Statistical Cookies: By collecting and reporting data in an anonymous form, statistical cookies help me get feedback on how visitors interact with the website.			
Name	Description	Expiry	Type
_ga (kitsimono.hu)	This cookie registers is a unique identifier that is used to generate statistical information about the use of the website.	2 years	HTTP
_gat (kitsimono.hu)	A Google Analytics uses cookies	1 day	HTTP
_gid (kitsimono.hu)	This cookie registers a unique identifier that is used to generate statistical information about the use of the website.	1 day	HTTP

Preferred Cookies: Using preferential cookies, you may notice information that changes the behavior or look of the Website, such as your preferred language or region in which you are located.			
Name	Description	Expiry	Type
_icl_current_language (shop.kitsimono.hu)	Notes the language setting you use.	1 day	HTTP

Essential Cookies: Essential cookies help us make the website usable by enabling basic features like site navigation and access to secure areas of the website. The website cannot work without these cookies.			
Name	Description	Expiry	Type

wc_cart_created (shop.kitsimono.hu)	Required for the basket process.	session cookie	HTML
wc_cart_hash_# (shop.kitsimono.hu)	Not named.	session cookie	HTML
wc_fragments_# (shop.kitsimono.hu)	Not named.	session cookie	HTML
woocommerce_cart_hash (shop.kitsimono.hu)	woocommerce_cart_hash (shop.kitsimono.hu) Requires products to be added to your cart. It also allows the Web site to promote related products to you based on your shopping cart.	session cookie	HTTP
woocommerce_items_in_cart (shop.kitsimono.hu)	woocommerce_items_in_cart (shop.kitsimono.hu) It is necessary to store the products in the basket. It also allows the Web site to promote related products to you based on your shopping cart.	session cookie	HTTP
wp_woocommerce_session_# (shop.kitsimono.hu)	Not named.	1 day	HTTP

I will inform you and ask for your consent at the start of the first visit if the data management is already started by visiting the site. Accepting cookies is not required, but some features of the website may not work properly without their acceptance. I do not use or allow cookies that allow third parties to collect data without your consent.

For more information about third party cookies, visit <https://www.google.com/policies/technologies/types/>, and privacy here [https://www.google.com/analytics/learn/privacy.html ? hl = hu](https://www.google.com/analytics/learn/privacy.html?hl=hu) can read.

4. DATA SECURITY

Personal information is provided voluntarily by you during registration, ordering or contacting. Incorrect, inaccurate or incomplete data may be a barrier to the use of the service for which I am not responsible.

Please help me with my privacy-related activity by carefully preserving your website and / or webshop username and password and not sharing it with anyone.

Your data may only be communicated or communicated within the limits set by law and, in the case of my data collectors, I shall ensure that you do not use your personal data for your own purposes and for purposes contrary to this Privacy Notice.

The court, the prosecutor's office and other authorities (eg police, tax office, National Data Protection and Information Freedom Authority) can be contacted for information, disclosure or provision of documents. In these cases, I have to fulfill my reporting obligation, but only to the extent strictly necessary to achieve the purpose of the request.

The contributors involved in data management and / or data processing are entitled to know your personal data to a predetermined extent - subject to the obligation of confidentiality.

Your personal data will be protected by appropriate technical and other measures, and I will ensure the security, availability, and unauthorized access, alteration, damage or disclosure of the data and any other unauthorized use. I check physical access through organizational measures, and keep paper-based documents locked up with adequate protection. I use encryption, password protection and antivirus software as part of the technical measures.

5. APPEALS

Before accessing before you address your complaint to the supervisory authority or the court, please contact me one of the available information on the website to resolve the issue as quickly as possible.

You are eligible:

- request information about the data processing I have done;
- request rectification, modification or supplementation of my personal data;
- protest against data management and request the deletion and blocking of your data (except for mandatory data management);
- exercise its right to data portability;
- to appeal to the court, to complain to the supervisory authority or to initiate proceedings (<https://naih.hu/panaszuegyintezes-rendje.html>).

Supervisory Authority: National Authority for Data Protection and Freedom of Information

- Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c.
- Mailing address: 1530 Budapest, Pf. : 5.
- Phone: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- E-mail: ugyfelszolgalat@naih.hu
- Homepage: <https://naih.hu/>

Judicial review of data protection law falls within the jurisdiction of the Tribunal, and may, at the choice of the data subject, be initiated before the court of the place of residence or domicile of the data subject. A foreign citizen may also lodge a complaint with the competent supervisory authority of his place of residence.

6. YOUR RIGHTS

a) Withdrawal of consent

If your legal basis for data management is your consent, you can revoke your consent for data management at any time for free

- deleting the registration,
- withdrawing consent for data management, or
- by revoking or blocking any contribution to the handling or use of any data that must be filled in during registration.

Registration for revocation of consent - for technical reasons, I accept a deadline of 2, ie two working days, but I would like to draw your attention to the fact that, for the purpose of fulfilling our legal obligations or for the validation of our legitimate interests, I may manage certain data even after the withdrawal of the consent.

In case of misleading use of personal data, and in case of suspicion of a criminal offense, at the same time as the termination of the registration, the data shall be deleted or, if necessary, retained during the period of civil liability or criminal proceedings.

(b) Right to information

Upon request, I will inform you of the data that I manage, or the data processed by me - or my authorized data processors, the source, purpose and legal basis of the data management (if this is not possible, the criteria for determining this period), the name, address and their activities related to data management, the circumstances of any data protection incidents, their effects, and the measures taken to prevent and prevent them, as well as the legal basis and the addressee of the transfer of your personal data.

I will provide information in the shortest possible time from the submission of the application within 15 days (at most within 1 month). If your request is manifestly unfounded or, in particular because of its repetitive nature, subject to the administrative costs of providing the requested information or information or taking the requested action under Article 12 (5) of the GDPR, I charge or refuse to pay the fee. measures.

c) Right of rectification, erasure and restriction

You are entitled to correct your inaccurate personal data without undue delay upon your request. Taking into account the purpose of data management, you are entitled to request the addition of incomplete personal data, including by means of a supplementary declaration.

You are entitled to delete your personal data at your request without undue delay if one of the following reasons applies:

- personal data are no longer needed for the purpose for which they were handled;
- You withdraw your consent for data management, and there is no other legal basis for data management;
- You are protesting against data management and there is no legitimate legitimate reason for data management;
- I have treated personal data unlawfully;
- the personal data must be erased in order to fulfill a legal obligation under EU or Member State law applicable to the controller;
- the collection of personal data related to the provision of services related to the information society as referred to in Article 8 (1) of the GDPR.

You are entitled to restrict data management upon request if any of the following is true:

- You dispute the accuracy of personal data, in which case the limitation applies to the period that allows you to verify the accuracy of personal data;
- data processing is unlawful and you oppose the deletion of the data and instead ask for a restriction on its use;
- I no longer need personal data for data processing purposes, but you require them for the purpose of claiming, enforcing or protecting legal claims; or
- You protested against data management; in this case, the limitation applies to the length of time until it is determined whether my legitimate reasons for data management take precedence over your legitimate reasons.

If you do not comply with your request for rectification, blocking or cancellation, I will provide you with the reasons for my refusal in writing or, with your consent, within 15 days of receiving the request (within one month at the latest), and will inform you of the judicial remedy, and the possibility of turning to the Authority.

d) Right to protest

You have the right to object to your personal data at any time for reasons related to your consent or legitimate interest, including profiling based on those provisions. In this case, personal data may only be further processed if there are compelling legitimate reasons for the processing of data which take precedence over your interests, rights and freedoms or which are related to the submission, validation or protection of legal claims.

If you protest against the processing of your personal information, I will review the protest as soon as possible, and within 15 days (at most within 1 month), and I will notify you in writing of my decision. If I decided that your protest was well founded, data management, including further data collection and data transfer, will be terminated, and data will be blocked and notified to all those to whom I have previously forwarded the personal data affected by the protest and who are obliged to take action to enforce the right of protest. If you do not agree

with my decision, or if I fail to do so, you may apply to the court within 30 days of the date of the decision or the last day of the deadline.

e) The right to data portability

You are entitled to receive the personal data I have provided to you in a structured, widely used, machine-readable format, and to forward such data to another data controller if the legal basis for Data Management is your consent or performance of the contract and data management is automated. To do this, I provide the data you request - depending on the data management related to the specific data - in .jpg, .pdf, .doc, .excel format (first in CD) or electronic message to you or to any other data controller you specify.

Budaörs, February 2019. 02. 14.