

# PRIVACY POLICY

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## **1. Purpose of the Privacy Policy**

The goal of our Privacy Policy is to provide all necessary information about processing your personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and assist the Data subjects in exercising their rights under Section 4.

The legal basis of our duty to communicate information is Article 12 of Regulation 2016/679 of the European Parliament and Council (hereinafter referred to as: GDPR) and the relevant Hungarian data protection regulations.

In the Privacy Policy, we may define you as “data subject”, or “contact person of our business partners” in the following.

You may find further definitions concerning your personal data within the Appendix of the current Privacy Policy.

## 2. Data of the controller

Name	<b>N.C.S. TRADE HUNGARY KERESKEDELMI KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG</b>
Registry number	13-09-095536
Registered seat	2000 Szentendre, Rákóczi Ferenc utca 11. Hungary
E-mail	<a href="mailto:3delite@3delite.hu">3delite@3delite.hu</a>
Telephone number	+3626505813
Tax number	12329201-2-13

### **3. Data processing concerning contacting and communication**

It is possible to connect us through our availabilities located on the website. Also, by communicating with our business partners, we process the personal data of their contact person. The details of these processing are described hereunder.

#### ***3.1.1. Processed personal data and purpose of processing***

personal data	purpose of processing
name	identification of the Data subject, or the contact person of our business partner
e-mail address	contacting and communication with the Data subject, or the contact person of our business partner

#### ***3.1.2. Legal basis of processing***

If you contact us through our website, we process your personal data on your freely given consent that you provide in the moment of your connection by phone or email (article 6 (1) a) of GDPR).

If you, as the representative of our business partners provide your personal data to communicate with us, the legal basis of processing personal data is the legitimate interest of us and our business partners (section 6 paragraph 1 point f of GDPR). It is each Party's legitimate interest to maintain an effective business communication and to perform the contract. Since it is the part of your scope of duty (representation of our business partners), in our view, processing your name and contact data doesn't restrict disproportionately your privacy and freedom of self-determination.

#### ***3.1.3. Duration of the processing***

If you contact us through our website, we process your personal data until the withdrawal of your consent. You have the right to withdraw your consent at any time via email. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

In relation to the processing of the personal data of our business partners' contact persons, we process their personal data until the personal data are no longer necessary in relation to the purposes for which they were collected or as long as it is possible according to the relevant acts (pursuant to the Hungarian Civil Code, 5 years following the performance or the termination of the contract, or 8 years following invoicing, in accordance with the Hungarian accounting act).

#### ***3.1.4. Mode of processing***

Your personal data are collected manually, in electronic form.

### ***3.1.5. Data protection contractual clause***

Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing concerning communicating with our business partners, we, as data controllers, while performing the contracts concluded with our business partners, both at the time of the determination of the means for processing, and at the time of the processing itself, implement appropriate technical and organizational measures, which are designed to implement data-protection principles, such as data minimization, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of GDPR.

## **3.2. Processing concerning customer service**

In order to answer your questions or to inspect the circumstances you requested a complaint for, we operate customer service.

### ***3.2.1. Processed personal data and purpose of processing***

personal data	purpose of processing
name	identification of the user
e-mail address	connecting with the user and providing information
phone number	connecting with the user and providing information

### ***3.2.2. Legal basis of processing***

We process the personal data we collect from you by legal obligations (article 6 point (1) c) of GDPR).

### ***3.2.3. Duration of processing***

We process your personal data as long as the relevant consumer protection acts determine it.

### ***3.2.4. Mode of processing***

Personal data are collected automatically and manually, in electronic and paper form.

### **3.3. Processing concerning invoicing**

After the performing of the orders we – with regard to Act C of 2000 on accounting – make out a bill. The details of such processing are described hereunder.

#### ***3.3.1. Processed personal data and purpose of processing***

personal data	purpose of processing
name	confirmation of the accounting
address	confirmation of the accounting

#### ***3.3.2. Legal basis of processing***

Processing is necessary for compliance with a legal obligation; with regard to section 6 paragraph 1 point f of GDPR, section 5 article 1 point b of Information Act and section 166 paragraph 1 to 3 of Act C of 2000.

#### ***3.3.3. Duration of the processing***

8 years after accounting.

#### ***3.3.4. Mode of processing***

Personal data are collected manually, in electronic form.

#### ***3.3.5. Provision of processing***

Since we cannot perform our accounting obligations without knowing any information about you, the processing is a statutory requirement.



## **4. What are your rights?**

### ***4.1. Right to access***

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information featured in point 3.

You have the right to access to the following information concerning the processing of your personal data:

- the purposes of the processing;
  
- the categories of personal data concerned;
  
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
  
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  
- the existence of the right to request from us 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;
  
- the existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

### ***4.2. Right to rectification***

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### ***4.3. Right to erasure***

You have the right to obtain from us the erasure of personal data concerning you without undue delay and we shall have the obligation to erase personal data without undue delay if it is mandatory according to Article 17 of GDPR. The erasure of your personal data is obligatory for us in the following instances:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent on which the processing is based, and where there is no other legal ground for the processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

#### ***4.4. Right to be forgotten***

If we made the personal data public and are obliged to erase your personal data, we inform 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.

**We do not make your personal data public.**

#### ***4.5. Right to restriction of processing***

You have the right to obtain from us restriction of processing if is obligatory according to Article 18 of GDPR. Such instances are the following:

- the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;

If you obtain restriction of processing in accordance with the above, we inform you before the restriction of processing is lifted.

#### ***4.6. Right to data portability***

You have the right to receive the personal data concerning you, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us if it is possible according to Article 20 of GDPR. Where technically feasible, you have the right to have the personal data transmitted directly from us to another controller.

#### ***4.7. 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 point (f) of Article 6(1) of GDPR (see: point 3.2. of the current policy). In such case, we no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

#### ***4.8. Right to lodge complaint***

You have the right to appeal to the Austrian and Hungarian courts and to make a complaint to the Austrian (<https://www.data-protection-authority.gv.at/>) and the Hungarian (<https://naih.hu/>) Supervisory Authority.

## **5. Measures and notification**

### ***5.1. Informing Data subjects***

We communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 of GDPR to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We also inform you about those recipients on the request of yours.

### ***5.2. Mode and deadline of notification***

We provide information on action taken on a request under Articles 15 to 22 of GDPR to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, we provided the information by electronic means where possible, unless you request it otherwise.

If we do not take action on your request, we inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy (see point 4.7.).

### ***5.3. Monitoring***

If we have reasonable doubts concerning the identity of the natural person making the request, we may request the provision of additional information necessary to confirm the identity of the data subject.

### ***5.4. Costs of measures and notifications***

We provide you information and take the necessary measures free of charge.

If your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or we refuse to act on your request.

## **6. Possible recipients**

### ***6.1. During the operation of our website***

Our website's hosting provider (data processor) can have access to the personal data you provide while using the website. The data processor's data are the following:

Name: W3HOST Internet Szolgáltató Betéti Társaság. 1156 Budapest, Sárfű utca 25.

Connection: +36702128291

### ***6.2. During ordering***

If you want to order a not free software from us, then our website will redirect you to the website of MyCommerce. You have to give your data for MyCommerce to order the software.

MyCommerce Privacy Policy: <https://www.mycommerce.com/privacy-policy/>

### ***6.3. Social media***

Our website has several social media profile so that if you „like” us on Facebook or „follow” us on Instagram, we may learn all the personal data which is public on your profile.

## **7. Cookies**

## ***7.1. Cookies in general***

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

## ***7.2. Our cookies***

The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

Name of the cookie: "cookie-consent": specifies if our cookie policy was accepted by the website visitor.

We use **Google Analytics** to analyse the use of our website.

Our analytics service provider generates statistical and other information about website use by means of cookies.

The information generated relating to our website is used to create reports about the use of our website.

Our analytics service provider's privacy policy is available at: <https://www.w3host.hu/w3hdocs/adatkezelesi-szabalyzat.pdf>

### ***Google AdSense:***

Google AdSense provides a way for publishers to earn money from their online content. AdSense works by matching ads to your site based on content and visitors. The ads are created and paid for by advertisers who want to promote their products. AdSense is a free, simple way to earn money by displaying ads next to your online content. With AdSense, you can show relevant and engaging ads to your site visitors and even customize the look and feel of ads to match your site.

Google AdSense Privacy Policy: <https://policies.google.com/privacy?hl=en>

### **7.3. Blocking cookies**

Most browsers allow you to refuse to accept cookies; for example:

- in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- in Firefox (version 39) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- in Chrome (version 44), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

### **7.4. Deleting cookies**

You can delete cookies already stored on your computer; for example:

(a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);

(b) in Firefox (version 39), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and

(c) in Chrome (version 44), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

Deleting cookies will have a negative impact on the usability of many websites.

## **8. Other provisions**

### ***8.1. Processing for different purpose***

If we intend to further process the personal data for a purpose other than that for which the personal data were collected, we provide the you prior to that further processing with information on that other purpose and with any relevant further information.

### ***8.2. Data protection***

We secure your personal information from unauthorized access, use or disclosure. We secure the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as connection data) is transmitted to other Web sites, it is protected through the use of encryption.

### ***8.3. Record of processing***

To comply with section 30 of GDPR, we maintain a record of processing activities under our responsibility.

### ***8.4. Data breaches***

Data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. In case of data breach, we act according to section 33 and 34 of GDPR.

### ***8.5. Changes to our Privacy Policy***

We will occasionally update this Privacy Policy to reflect feedback. We encourage you to periodically review this Policy to be informed of how we are protecting your information.

Effective: 25.05.2018.

**N.C.S. TRADE HUNGARY Kft.**

Controller



## Appendix - Definitions

- 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
- 'pseudonymisation' means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- 'filing system' means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
- 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

- 'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 'data concerning health' means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- 'enterprise' means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;
- 'group of undertakings' means a controlling undertaking and its controlled undertakings;
- 'supervisory authority' means an independent public authority which is established by a Member State pursuant to Article 51;
- 'supervisory authority concerned' means a supervisory authority which is concerned by the processing of personal data because:
- 'relevant and reasoned objection' means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;