

Updated: 30 March 2020

1. Subject matter of the Privacy Policy

Strapa-pack Kft. (Data Controller) processes personal data learnt or recorded in the course of its activity in line with Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as GDPR) And with Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as Info Act).

The aim of the Privacy Policy is to set out data protection and data processing principles and data protection and data processing policy applied by the Data Controller. The Data Controller expresses its intention to be bound by these principles and policy. A further aim of the document is to provide information about the carried out data processing and the related rights and remedies.

2. Data processing principles

During its data processing activity, the Kft. complies with the principles listed in Article 5 of the GDPR: lawfulness, fair procedure and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

Data Controller: Strapa-Pack Csomagoló és Szolgáltató Kft. Registered Seat: 2330 Dunaharaszti Bláthy O. utca 7. Person in charge of data protection: Zimmermann Márta (Phone: +36 70 325 8880, info@strapa-pack.hu)

3. Data processing in relation to electronic monitoring system

Strapa-pack Kft. operates an electronic monitoring system at its registered seat (2330 Dunaharaszti Bláthy O. utca 7.), to the fact of which attention is drawn by means of boards.

Deriving from the principle of purpose limitation, the electronic monitoring system is used by the Data Controller due to reasons set out in Act CXXXIII of 2005 on the personal and property protection and the private detective activities, and also because of property protection reasons and the footage can be used for this respect as well.

Further information on the data processing activity relating to the camera surveillance can be gained from the displayed camera surveillance information leaflet.

purpose of data processing: protection of the safety of the object and that of the assets of the Data Controller and also the provision of safety and protection of the assets of persons at the location of the surveilled area.

legal basis of data processing: legitimate interest set out in Article 30 Section (2) of Act CXXXIII of 2005 on the personal and property protection and the private detective activities and in Section (1) f) of Article 6 of the general data protection regulation.

type of data processing: photo of the affected person or data that can be gained from the footage.

name of Data Processors: ÁD2Elektronika 2300 Ráckeve, Kossuth L. út 122, operator and maintainer of the camera Registered Seat: 2330 Dunaharaszti, Szent István utca 2.

duration of data processing or reasons for determining duration:

if it is not used, the footage shall be deleted in 3 (i.e. three) working days from recording [Article 31 (Section 2) of Act CXXXIII of 2005 on the personal and property protection and the private detective activities]

- if the Data Controller is required by legal regulation or by verification of legal interest not to delete the footage, and the footage is not claimed, then the footage shall be deleted in 30 (i.e. thirty) days from the request [Article 31 (6) of Act CXXXIII of 2005 on the personal and property protection and the private detective activities]

collecting data: from the data subject

4. Data processing in relation to the operation of the website

Data Controller operates its websites at the following URL addresses:

- 1) www.strapa-pack.hu
- 2) www.van-pack.hu
- 3) www.strapa-doboz.hu
- 4) www.rakterburkolatok.hu

1) URL address of the site: www.strapa-pack.hu

Visitors have the opportunity to contact the Data Controller via the websites.

There are lists on the top and at the bottom of www.strapa-pack.hu. If you click on “references”, a contact form appears, in which the following data are processed: family name, first name, company name, phone number, e-mail address, weight of the product, size: length, width, height, description of the product to be packed and also data provided in the notes section.

The website uses no cookies.

2) URL address of the site: www.van-pack.hu

At www.van-pack.hu website the following data will be processed under contact information: name, e-mail, phone number, brand, other, type, what covering the customer wants, content of the message.

By clicking on Impressum at the bottom of the website, www.strapa-pack.hu website pops up.

The process of entering of visitors to the website and leaving that are assisted by small data packages, so called cookies, which are placed by the website on the IT devices of the visitors and are subsequently read back. Cookies are to ensure proper operation and more effective serving and to collect statistical data anonymously.

3) URL address of the site: www.strapa-doboz.hu

Upon entering the website, www.strapa-pack.hu site appears, with the name of box manufacture.

Under request for quotation menu: name of customer, company name, e-mail address, phone number, weight of product and size, length, width, height, number of items, weight of the product, deadline, and message data are processed.

The website has a Facebook site.

The process of entering of visitors to the website and leaving that are assisted by small data packages, so called cookies, which are placed by the website on the IT devices of the visitors and are subsequently read back. Cookies are to ensure proper operation and more effective serving and to collect statistical data anonymously.

Upon opening the website, www.strapa-pack.hu website opens.

E-mail address on website www.strapa-doboz.hu is doboz@strapa-pack.hu.

4) Name of the website: www.rakterburkolatok.hu

Upon opening the website, www.van-pack.hu website opens.

Visitors may subscribe to newsletters on the website.

The following data shall be provided: processed data, name, e-mail address and the message.

On the website online shopping is possible,

- data of invoicing and delivery:
 - first name,
 - family name
 - company name
 - street, number, flat,
 - town, county, zip code
 - phone number
 - e-mail address

Terms of payment are: bank transfer or payment at the premises of the manufacturer.

Contents of the order which contains the data of the ordered products: product, subtotal, delivery, value of the VAT, total.

Process of entering of visitors to the website and leaving that are assisted by small data packages so called cookies (hereinafter referred to as cookies), which are placed on the IT devices of the visitors and are subsequently read back. Cookies are to ensure proper operation and more effective serving and to collect statistical data anonymously.

purpose of data processing: to facilitate contacting the Data Controller

legal basis of data processing: consent of data subjects as set out in Section (1) a) of Article 6 of the General Data Protection Regulation and Section (1) b) of Article 5 of Infotv.

other laws: Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities and Act CVIII of 2001 on Electronic Commerce and on Information Society Services.

collecting data: from the data subject

type of data collection: name, e-mail address, phone number, subject of the message, text of the message

data subject: visitor of the website

name of data processors: maintenance is carried out by tarhely.eu Kft., **name of the bank managing transfers**

duration of data processing or reasons for determining duration: until the case is settled

5. Sending newsletters

A Customers of www.rakterburkolatok.hu (upon opening the website, www.van-pack.hu website opens) have the possibility to subscribe to marketing newsletters of the Data Controller. In line with that, the Data Controller is entitled to send direct marketing newsletters to those customers - to the e-mail address provided during registration (and modified later) - who subscribed, with the content and frequency the Data Controller deems necessary. These newsletters contain information about the new products, sales and promotions of the Data Controller and other awareness-rising information related to its activity.

Regarding newsletters, the Data Controller uses such software which enables it to make the content of the newsletters customised on the basis of previous purchases and purchase activity.

The activity of sending newsletters is inspected by the National Media and Infocommunications Authority - in cases belonging to the scope of the act on advertising.

Consent to sending newsletters

From data protection aspect, sending of newsletters shall constitute a data processing activity the aim of which is different from the operation of a webshop.

Those data subjects get newsletters who give their consents that their personal data are processed by the service provider for the purpose of sending newsletters.

Unsubscribing from newsletters

On the basis of the act on advertising, the publisher of the advertisement shall keep a record on those persons who gave their consents to receive newsletters.

Data - of the addressee of the advertisement - shall be processed in line with the contents of the declaration of consent, until the declaration is withdrawn and it shall be handed over to third parties only with the prior consent of the data subject.

purpose of data processing: sending direct marketing newsletters to subscribers

legal basis of data processing: consent of data subjects as set out in Section (1) a) of Article 6 of the General Data Protection Regulation and Section (1) b) of Article 5 of Infotv.

type of data processing: first name and family name, e-mail address and phone number of the customer

data subject: to whom the kft. sends newsletters

name of data processors: no data processors are applied

duration of data processing or reasons for determining duration: until the consent is given. In case the customer intends to withdraw his consent given to the Data Controller to send newsletters (i.e. intends to unsubscribe) it can be done on www.rakterburkolatok.hu website (upon opening the website, www.van-pack.hu website opens).

6. Data processing in relation to the operation of an online webshop

Data Controller operates a webshop at the www.rakterburkolatok.hu (upon opening the website, www.van-pack.hu website opens) website, with the aim of selling products distributed there.

On the basis of Article 2 Section a) and f) of Act CVIII of 2001 on certain issues of electronic commerce activities and information society services (Eker. tv.), the webshop related activity of the Data Controller shall be deemed as electronic commerce activity.

Regarding contracts related to the provided services, the Data Controller - as a service provider - is entitled to process data on the basis of Section (1) of Article 13/A of Eker tv. for the below purposes:

- entering into a contract,
- setting out the contents of the contract,
- modification of the contract,
- monitoring the performance of the contract
- invoicing fees arising from the contract, and
- enforcement of claims related to the contract.

For the above purposes - in order to identify customers -, the Data Controller is entitled to process the personal data and addresses of natural persons using the services of the webshop. Furthermore, for the purposes of service provision, the Data Controller may process such personal data which are technically necessary to provide services; thus, in relation to such data, data processing is mandatory. Data Controller shall operate its devices used in the course of service provision in a way that personal data are processed only if it is necessarily required to provide services and to meet other objectives set out in Eker tv. Such data processing may be carried out only to the necessary extent and duration.

Taking in consideration the enforceability of possible claims arising from contract(s) entered into by and between the Data Controller and the Customer, data set out above shall be processed by the Data Controller for five years from the due date of the claims - in accordance with Section (1)-(2) of Article 6:22 of the Civil Code.

Data recorded in the course of registration

Only registered customers can order products from the webshop.

On the basis of the General Terms and Conditions of the Webshop (GTC), the Customer shall provide the following data during registration:

- data of invoicing and delivery:
 - first name,
 - family name
 - company name
 - street, number, flat,
 - town, county, zip code
 - phone number
 - e-mail address

In the course of registration, the IP address used by the Customer is automatically recorded.

Processing of family name and first name, address and billing address (if not identical with the address) - in case of a company, the company name as well - by the Data Controller is based on the express authorisation of Section (3) of Article 13/A of Eker tv. The same section authorises the Data Controller to process IP addresses and e-mail addresses, since those are deemed to be essential personal data which are technically necessary to provide service. Processing phone number is based on the consent of the Customer, however, replacement of electronic mailing and making communication rapid require the processing of these data. The Customer may provide his fax number on a voluntary basis.

Following registration, the account of the Customer is immediately made and the Customer is informed thereof by means of a notification sent to the e-mail address provided by him. Processing of data recorded in the course of registration is necessary for the services provided by the webshop and to identify Customers; thus, these data are processed by the Data Controller until the account is deleted.

The Customer may modify his data provided in the course of registration on the relevant surface of the website at any time.

The Customer can delete his own account within "own account" settings under "modification of account data" tab.

The Customer shall be informed about deletion in an electronic letter sent to the e-mail address provided by the Customer. By deletion of the personal account the data of the Customer recorded during registration are deleted by the Data Controller.

Data recorded during placing orders, data of previous orders, and other data possibly recorded in relation to the order

The Customer may initiate the placement of an order in the webshop on the relevant surface of the website. In the course of placing an order the Customer shall indicate or shall provide:

The website allows online purchasing.

- data of invoicing and delivery:
 - first name,
 - family name
 - company name
 - street, number, flat, town, county, zip code
 - phone number
 - e-mail address

After the Privacy Policy and the GTC are ticked, the order can be placed.

Terms of payment: bank transfer or payment at the premises of the manufacturer.

Contents of the order can be seen, which have the data of the ordered products: product, subtotal, delivery, value of the VAT, total.

In case of online Debit Card Payment, the Data Controller records and processes:

The content of the order:

- the data of the ordered product,
- product,
- subtotal
- delivery
- amount of VAT
- total

Furthermore, the Customer can

- leave a comment to the order
- provide its bank account number and its bank where the account is held

Data processed and recorded when the order is placed will be processed by the Data Controller after the order is fulfilled, thus providing the Customer with the opportunity to review his previous orders, and to facilitate and quicken the placement of future orders. Recording of the above data of previous orders is based on the voluntary consent of the Customer. The Data Controller processes these data as long as the account of the Customer exists, until the deletion thereof.

The Customer may require the deletion of his account in an electronic mail sent to info@van-pack.hu. The Data Controller shall delete the account of the Customer within two working days and send a confirmation thereof to the address provided by the Customer. By deletion of the account of the Customer, all the data of the Customer and data recorded while placing orders will be irreversibly deleted.

Data in e-mails, correspondence and declarations made in the course of amending and revoking orders and upon withdrawal from the order shall be processed by the Data Controller in line with the purpose of the given document, on the basis of authorisation provided by the law and shall be archived after the case is settled.

purpose of data processing: proper provision and use of the services (hereinafter referred to as services) of the webshop, in particular registration of the customers of the webshop and keeping a record of them, managing and performing orders, carrying out and documentation of purchase transactions and the relating invoicing, furthermore, analysing the shopping patterns of consumers and maintaining contact with the customers.

legal basis of data processing: consent of data subjects as set out in Section (1) a) of Article 6 of the General Data Protection Regulation and Section (1) b) of Article 5 of Infotv. Section (2) of Article 169 of Sztv. and Article 13/A of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

type of data processing: family name and first name, address and billing address if it is different from the address (if applicable, the company name is necessary to be provided), e-mail address, phone number, fax number, shipping address, ordered products, quantity of ordered products, chosen method of payment, name of the ordered products, gross and net purchase price of the ordered products, data of order, specific identification code of the order, specific identification code of the package containing the ordered product, IP address used in the course of placing the order.

collecting data: from the data subject

In case of online Debit Card Payment, the Data Controller processes the following data

- contents of the order which contains the data of the ordered product
- product,
- subtotal
- delivery
- amount of VAT
- total

Furthermore, the Customer can

- leave a comment to the order
- provide its bank account number and its bank where the account is held

data subject: the person who purchases something from the offer of the webshop

name of data processors: name of the bank participating in the money transfer

addressee of data transmitting: no data transmitting occurs

Duration of data processing or reasons for determining duration: data provided in the course of registration are processed until the data subject requires erasure, and in any other cases for 8 years from the recording of the data [Section (1)-(2) of Article 169 of Sztv.]

7. **Facebook**

Data Controller has a Facebook page at <https://www.strapa-pack.hu>.

Anybody can have access to this page without providing his identity and personal data.

Data Controller may publish photos on this page.

In accordance with the GDPR, the Authority is competent to carry out the conferred tasks and exercise the conferred powers in the territory of its own member state.

Data of the European users of Facebook are processed by Facebook Ireland Ltd, which can be contacted via the Internet (<https://tinyurl.com/jxwbe47>), or in a mail at the following address: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland.

In case any complaint arises against the data controller, you may turn to the Irish data protection authority dealing with the European supervision of Facebook at info@dataprotection.ie.

In the Help Centre of Facebook - accessible without registration and logging in -, under the menu of “Rules and Reports” and submenu “Reporting abuse” you find information on what cases and how you can submit a report at the social media site.

Detailed information on the service is available at <https://facebook.com/help/cookies>.

8. **Exercising the rights of data subjects related to processing their personal data:**

Rights of data subjects on the basis of the General Data Protection Regulation and the Info tv.:

1. Right to prior information
2. Right to access
3. Right to rectification
4. Right to restriction of processing
5. Right to erasure
6. Right to objection

Data Controller shall facilitate the exercise of the above rights of data subjects. Data Controller shall not refuse the request of the data subject to exercise his above rights, unless Data Controller demonstrates that it is not in a position to identify the data subject.

The Data Controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month from the receipt of the request.

Where the Data Controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the Data Controller - prior to that further processing -, shall provide the data subject with information on that other purpose and with any relevant further information as referred to in paragraph 2.

Right to prior information

Prior to the commencement of the processing operations performed by the Data Controller or the Data Processor acting on behalf of the Data Controller, or instructed by it, the data subject shall be informed without delay or at the latest immediately upon the start of the first processing operation.

Proportionately to the desired objective, the Data Controller may delay the performance of providing the information, it may restrict the content of the information or it may dispense with providing the information, if this measure is strictly necessary.

Right of access by the data subject

For the purpose of the enforcement of the right to access, the data controller shall, upon request, inform the data subject whether his data are processed by the Data Controller itself or by a processor acting on behalf of, or instructed by the Data Controller.

The Data Controller may restrict or reject, proportionately to the desired objective, the enforcement of the data subject's right to access if this measure is absolutely necessary, about which the data controller shall inform the data subject in writing without delay.

Right to rectification

For the purpose of the enforcement of the right to rectification, if the personal data processed by the Data Controller or by the processor acting on behalf of, or instructed by the Data Controller are inaccurate or incomplete, the Data Controller shall specify or rectify them without delay, or it shall supplement them with a declaration attached by the data subject provided that it is compatible with the purpose of processing.

If, according to the provisions, the Data Controller rectifies the personal data processed by the Data Controller or by a processor acting on behalf of the data controller or instructed by it, the Data Controller shall notify that data controller about the fact of rectification and the rectified personal data who transferred the personal data affected by rectification.

Right to erasure

In order to ensure the right to erasure of the data subject, the Data Controller shall erase the personal data concerning the data subject without undue delay:

- a. if the personal data have been unlawfully processed
- b. if the personal data are no longer necessary in relation to the purposes for which they were collected
- c. if the time set out for data processing has elapsed
- d. if legal ground for processing has ceased to exist and there is no other legal ground for the processing

Right to restrict data processing

In order to apply the right of the data subject to restrict processing, the Data Controller shall limit its data control to certain data processing operations

- a. if the accuracy of the personal data is contested by the data subject, restriction applies for a period enabling the Data Controller to verify the accuracy of the personal data
- b. if the data should be erased but erasure of the data would infringe the legitimate rights of the data subject
- c. if the data should be erased but they are necessary to carry out certain inspections and proceedings set out by law
- d. if the data should be erased but in order to meet the obligation of documentation, retention of the data is necessary

If the Data Controller or data processor refuses the claim of the data subject to correct, erase or restrict his personal data, the data subject shall be informed without delay.

Right to object

The data subject shall have the right at any time to object - on grounds relating to his particular situation -, to processing of personal data concerning him carried out by the Data Controller in the exercise of official authority vested in the controller, unless data processing is necessary for claiming the legitimate interests of the Data Controller or a third party.

Withdrawal of consent

The data subject shall have the right to withdraw his consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Remedy

Information, complaint

Insofar as data subject assumes that his rights have been infringed as a result of the processing of personal data, he may turn to the Data Protection Officer of the Data Controller for information and to practise his rights:

Zimmermann Márta (Phone: +36 70 325 8880, info@strapa-pack.hu)

Making a complaint at the Authority

In order to file for further remedy, complaints may be submitted at the Hungarian National Authority for Data Protection and Freedom of Information. The Authority investigates the complaints only if the data subject has already made a complaint at the Data Controller in relation to exercise his rights set out in the complaint before turning to the Authority.

Contact information of the Authority:

Hungarian National Authority for Data Protection and Freedom of Information

Mailing address: Post Office Box 5, 1530 Budapest

address: 1125 Budapest, 22/C Szilágyi Erzsébet fasor

Phone: +36 (1) 391-1400

Phone: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

URL <http://naih.hu>