

# Privacy Policy

## Privacy policy

### Description of the data management performed during the operation of the webshop

Date of acceptance: 2021-03-30

Data handler: Hangtechnika Kft.

1034 Budapest, Bécsi út 99-101.

E-mail: [info@sonopart.hu](mailto:info@sonopart.hu)

Tel: +36 1 250-3725

Web: <http://www.sonopart.hu/>

## Information on the use of cookies

The Data Controller uses cookies when visiting the website. The information package consisting of cookies and numbers that our website sends to your browser for the purpose of saving certain settings, facilitates the use of our website and contributes to the collection of some relevant, statistical information about our visitors.

Some cookies do not contain personal information and are not suitable for identifying an individual user, but some contain a unique identifier - a unique, randomly generated sequence of numbers - that is stored by your device, thus ensuring your self-identification. The period of operation of each cookie (cookie) is described in the relevant description of each cookie (cookie).

Legal background and legal basis of cookies: Your consent.

### The main features of the cookies used by the website are:

- Session cookie: These cookies store the visitor's location, browser language, payment currency, lifetime when the browser is closed, or up to 2 hours.
- Referer cookies: Record the external page from which the visitor came to the site. Their lifespan lasts until the browser is closed.
- Last viewed product cookie: Records the products that were last visited by the visitor. Their lifespan is 60 days.
- Last viewed category cookie: Records the last viewed category. Its lifespan is 60 days.
- Mobile version, design cookie: Detects the device used by the visitor and switches to full view on mobile. Shelf life 365 days.
- Cookie acceptance cookie: Upon arrival at the site, you accept the cookie storage statement in the warning window. Shelf life 365 days.
- Cart Cookie: Records the products placed in the cart. Shelf life 365 days.
- Exit # 2 cookie: Option # 2 exits the visitor after 90 days. Its lifespan is 90 days.
- Backend ID cookie: The ID of the backend server serving the page. It lasts until you close your browser.
- Google Analytics cookie: Google Analytics is Google's analytics tool that helps website and application owners gain a more accurate picture of their visitors' activities. The Service may use cookies to collect and report information from statistics about the use of the Website without personally identifying visitors to Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reporting from site usage statistics, GoogleAnalytics, along with some of the advertising cookies described above, can be used to serve more relevant ads across Google products (such as Google Search) and across the web.

If you do not accept the use of cookies, certain features will not be available to you. More information about deleting cookies can be found on your browser's website.

## Data processed for contracting and performance purposes

Several data management cases may be implemented for the conclusion and performance of the contract. We would like to inform you that data processing related to complaint handling and warranty administration will only take place if you exercise any of these rights. If you do not make a purchase through the webshop, you are only a visitor of the webshop, then what is written about data management for marketing purposes may apply to you, if you give us your consent for marketing purposes. Data management for the conclusion and performance of contracts in more detail:

- **Contact.** For example, if you contact us by e-mail, contact form or telephone with a question about a product. Pre-contact is not mandatory, you can order it from the webshop at any time, omitting it. (Data managed: The information you provided during the contact. Duration of data management: The data will only be processed until the contact is completed. Legal basis for data management: Your voluntary consent, which you provide to the Data Controller by contact [Data processing pursuant to Article 6 (1) (a) of the Regulation])
- **Registration on the website.** By storing the data provided during registration, the Data Controller can provide a more convenient service (eg the data of the data subject does not have to be entered again when purchasing again). Registration is not a condition for concluding a contract (Data managed: During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase. Duration of data management: Until the withdrawal of your consent. Legal basis for data management: Your voluntary consent, which you give to the Data Controller by registration [Regulation6. processing of data pursuant to Article 1 (1) (a)])
- **Order processing.** During the processing of orders, data management activities are required in order to fulfill the contract Data managed: During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product, the order number and the date of purchase. If you have placed an order in the webshop, data management and the provision of data is essential for the fulfillment of the contract. (Data managed: During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product, the order number and the date of purchase. If you have placed an order in the webshop, data management and the provision of data is essential for the fulfillment of the contract. Duration of data management: The data is processed for 5 years according to the civil law limitation period. Legal basis for data management: Performance of the contract. [Data processing pursuant to Article 6 (1) (b) of the Regulation])
- **Issuance of the invoice** The data management process takes place in order to issue an invoice in accordance with the law and to fulfill the obligation to keep accounting documents. The Stv. Pursuant to Section 169 (1) - (2), companies must keep the accounting document directly and indirectly supporting the accounting accounts.

(Managed data: Billing name, address, email address. Duration of data management: The issued invoices are issued in accordance with the Act. Pursuant to Section 169 (2), it must be retained for 8 years from the date of issue of the invoice. Legal basis for data management: Act CXXVII of 2007 on Value Added Tax. Pursuant to Section 159 (1), the issue of an invoice is mandatory and must be kept for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting [Data Management pursuant to Article 6 (1) (c) of the Decree].)

- **Freight data management** The data management process takes place in order to deliver the ordered product. (Managed data Name, address, e-mail address, telephone number. Duration of data management The Data Controller manages the data for the duration of the delivery of the ordered goods. Legal basis for data management Performance of contract [Data processing pursuant to Article 6 (1) (b) of the Regulation].)
- **Guarantee service** The data management process is in place to handle warranty complaints. If self-warranty administration is requested, data management and data provision are essential. (Managed data Customer's name, telephone number, email address, content of the complaint. Duration of data management Warranty claims are retained for 5 years under the Consumer Protection Act. Legal basis for data management Whether your voluntary decision is addressed to us in the case of warranty administration, however, is addressed to us by the Consumer Protection Act 1997 CLV. Act 17 / A. § (7), we are obliged to keep the complaint for 5 years [Article 6 (1) c) point data management])
- **Handling of other consumer complaints** The data management process is in order to handle consumer complaints. If you have made a complaint to us, data management and the provision of data are essential. (Managed data Customer's name, telephone number, email address, content of the complaint. Duration of data management Warranty claims are retained for 5 years under the Consumer Protection Act. Legal basis for data management Whether you have a complaint about your voluntary decision, however, if you do contact us, is covered by the 1997 CLV on Consumer Protection. Act 17 / A. § (7), we are obliged to keep the complaint for 5 years [data management according to Article 6 (1) (c) of the Decree].)
- **Data processed in relation to the verifiability of consent** During the registration, ordering and subscribing to the newsletter, the IT system stores the IT data related to the consent for the purpose of proving it later. (Managed data Date of consent and IP address of the person concerned. Duration of data management Due to legal requirements, the consent must be able to be verified later, therefore the data storage period will be stored for the limitation period after the termination of the data processing. Legal basis for data management Article 7 (1) of the Regulation provides for this obligation. [Data processing pursuant to Article 6 (1) (c) of the Regulation])

## Data management for marketing purposes

Newsletter sending data management. (Managed data Name, e-mail address. Duration of data management Until the withdrawal of the data subject's consent. Legal basis for data management Your voluntary consent to provide your Data Controller Number by subscribing to the newsletter [Data processing under Article 6 (1) (a) of the Regulation])

## Additional data management

If the Data Controller wishes to perform further data processing, he / she shall provide preliminary information on the essential circumstances of the data management (legal background and legal basis of data management, purpose of data management, scope of data processed, duration of data management).

We would like to inform you that written requests for data from the authorities based on legal authorization must be complied with by the Data Controller. The Data Controller shall inform Info law 15 about data transfers. § (2) - (3), keeps records (to which authority, what personal data, on what legal basis, when was transmitted by the Data Controller), the content of which the Data Controller provides information on request, unless its disclosure is excluded by law.

### Data processing activities related to freight transport

Name of the data processor: GLS General Logistics Systems Hungary Package-Logistics Ltd.

registered office: 2351 Alsónémedi, GLS Európa u. 2.

phone number: 06-29-88-67-00

email address: [info@gls-hungary.com](mailto:info@gls-hungary.com)

The Data Processor participates in the delivery of the ordered goods on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor may manage the name, address and telephone number of the customer until the end of the calendar year following the dispatch of the postal item, after which it shall be deleted immediately.

### Data processing activities related to newsletters

Name of the company operating the newsletter system: UNAS Online Kft.

registered office: 9400 Sopron, Kőszegi út 14.

e-mail address: [unas@unas.hu](mailto:unas@unas.hu)

The Data Processor participates in the sending of newsletters on the basis of a contract concluded with the Data Controller. In doing so, the Data Processor handles the name and e-mail address of the data subject to the extent necessary for sending a newsletter.

## Accounting data management

Name of the data processor: Távvagyvitel Kft.

The registered office of the data processor: 1031 Budapest, Nánási út 16 / A

Telephone number of the data processor: (20) 383 9947

E-mail address of the data processor: [tavugyvitel@tavugyvitel.hu](mailto:tavugyvitel@tavugyvitel.hu)

The Data Processor participates in the accounting of accounting documents on the basis of a written contract concluded with the Data Controller. In doing so, the Data Processor shall provide the name and address of the data subject to the extent necessary for the accounting records, in accordance with the provisions of the Act. It shall be managed for a period of time in accordance with Section 169 (2), after which it shall be canceled immediately.

## Invoicing data processing

Name of the data processor: NetSoft Informatika Kft.

The registered office of the data processor: 1214 Budapest, Erdősor u. 16.

Telephone number of the data processor: +36 20 404 1010

E-mail address of the data processor: [info@okosugyvitel.hu](mailto:info@okosugyvitel.hu)

The Data Processor participates in the registration of accounting documents on the basis of a contract concluded with the Data Controller. In doing so, the Data Processor shall provide the name and address of the data subject to the extent necessary for accounting purposes, in accordance with the provisions of the Act It shall be managed for a period of time in accordance with Section 169 (2), after which it shall be canceled.

## Data processing related to the operation of a CRM system

Name of the data processor: NetSoft Informatika Kft.

The registered office of the data processor: 1214 Budapest, Erdősor u. 16.

Telephone number of the data processor: +36 20 404 1010

E-mail address of the data processor: [info@okosugyvitel.hu](mailto:info@okosugyvitel.hu)

The Data Processor participates in the order register on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor handles the name, address, telephone number, number and date of the data subject within the civil law limitation period.

## Data processing related to online payment

Name of the data processor: Paylike ApS

The data processor is established at P. O. Pedersensvej 14, Aarhus, Denmark

Telephone number of the data processor: +36 1 500 9480

The e-mail address of the data processor: [hello@paylike.hu](mailto:hello@paylike.hu)

The Data Processor participates in the execution of the Online payment on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor manages the billing name, address, development number and date of the data subject within the civil limitation period.

## Data transmission

[www.arukereso.hu](http://www.arukereso.hu) (Naspers OCS Hungary Kft. 1074 Budapest, Rákóczi út 70-72., Tax number: 24868291-2-42, Company registration number: 01-09-186759) In order to operate a reliable store program, after the purchases made here, the customer Your e-mail address and the name of the product you have purchased will be forwarded to [arukereso.hu](http://arukereso.hu). The purpose of the data transfer is to request and display customer feedback. The personal data transmitted in this way is handled by Naspers OCS Hungary Kft. In accordance with the Data Protection and Data Management Regulations of [www.arukereso.hu](http://www.arukereso.hu). Naspers OCS Hungary KFT is the data controller of the data transmitted in this area.

## Your rights during data management

Within the period of data processing, you have the following rights in accordance with the provisions of the Decree:

the right to withdraw consent

access to personal data and data management information

right of rectification

restrictions on data management,

right of cancellation

the right to protest

the right to portability.

If you wish to exercise your rights, this will involve your identification and the Data Controller must communicate with you. Therefore, you will be required to provide personal information for identification purposes (but identification may only be based on information that the Data Controller handles about you anyway) and your data management complaints will be available in the Data Controller's email account within the timeframe specified in this information. If you were our customer and would like to identify yourself for complaint or warranty purposes, please also enter your order ID for identification. Using this, we can also identify you as a buyer.

Complaints related to data management will be answered by the Data Controller within 30 days at the latest.

### Right to withdraw consent

You have the right to withdraw your consent to data management at any time, in which case the deleted data will be deleted from our systems. Please note, however, that in the event of an unsatisfied order, cancellation may result in us not being able to deliver to you. In addition, if the purchase has already been made, we will not be able to delete your billing information from our systems based on accounting requirements, and if you owe us, we may process your information in the event of a withdrawal of consent based on your legal interest in recovering the claim.

### Access to personal data

You have the right to receive feedback from the Data Controller as to whether the processing of your personal data is in progress, and if data processing is in progress, you have the right to:

- have access to the personal data processed and
- inform the Data Controller of the following information:
  - the purposes of data management;
  - categories of personal information processed about you;
  - information on the recipients or categories of recipients with whom the personal data have been or will be communicated by the Data Controller;
  - the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period;
  - your right to request the Data Controller to rectify, delete or restrict the processing of personal data concerning you and to object to the processing of such personal data in the event of data processing based on a legitimate interest;
  - the right to lodge a complaint with the supervisory authority;
  - if the data was not collected from you, all available information about their source;
  - the fact of automated decision-making (if such a procedure has been used), including a profiling, and at least in these cases the logic used and understandable information about the significance of such data processing and the expected consequences for you.

The purpose of exercising this right may be to establish and control the lawfulness of data processing, therefore in case of repeated requests for information, the Data Controller may charge a fair fee for the provision of the information.

Access to personal data The Data Controller ensures that, after you have been identified, you will send you the managed personal data and information by e-mail.

Please indicate in your request whether you are requesting access to personal data or information related to data processing.

### Right to rectification

You have the right, at the request of the Data Controller, to correct inaccurate personal data concerning you without delay.

### **Right to restrict data management**

You have the right, at the request of the Data Controller, to restrict the data processing if one of the following is met:

- You dispute the accuracy of the personal data, in which case the limitation applies to the period of time that allows the Data Controller to check the accuracy of the personal data, if the exact data can be established immediately, there will be no limitation;
- the data processing is illegal, but you object to the deletion of the data for any reason (for example, because the data is important to you in order to enforce a legal claim), so you do not request the deletion of the data, but instead request a restriction on its use;
- the Data Controller no longer needs the personal data for the purpose of the indicated data management, but you request them in order to submit, validate or protect legal claims; obsession
- You have objected to the data processing, but the data controller's legitimate interest may also justify the data processing, in which case the data processing must be restricted until it is determined whether the Data Controller's legitimate reasons take precedence over your legitimate reasons.

If the data is subject to a restriction on the first, such personal data, with the exception of storage, only with the consent concerned, or with the submission, enforcement or protection of legal claims or other natural or legal rights, or the Union, which may be handled by any relevant public.

The data controller will inform you in advance (at least 3 working days before the lifting of the restriction) of the lifting of the restriction of data management.

### **Right to delete - right to forget**

You have the right to have the Data Controller delete your personal data without undue delay if any of the following reasons exist:

- personal data is no longer required for the purpose for which it was collected or otherwise processed by the Data Controller;
- You withdraw your consent and there is no other legal basis for the processing;
- You object to the processing of data on the basis of a legitimate interest and there is no overriding legitimate reason (ie a legitimate interest) in the processing of the data,
- the personal data was handled unlawfully by the Data Controller and this complaint was established,
- personal data must be deleted in order to comply with a legal obligation under Union or Member State law applicable to the Data Controller.

If the Data Controller has disclosed personal data about you for any lawful reason and is obliged to delete it for any of the reasons set out above, it shall take reasonable steps, including technical measures, to inform other data controllers handling the data, taking into account the available technology and implementation costs. that you have requested the deletion of the links to the personal data in question or a copy or duplicate of this personal data.

Deletion does not apply if data processing is required:

- for the purpose of exercising the right to freedom of expression and information;
- fulfillment of an obligation under EU or national law applicable to the controller to process personal data (such as data processing in the context of invoicing, as the retention of the account is required by law), in the public interest or in the exercise of a public authority conferred on the controller;
- to submit, enforce or protect legal claims (eg if the Data Controller has a claim against you and has not yet fulfilled it, or a consumer or data processing complaint is being processed).

### **Right to protest**

You have the right to object at any time for reasons related to your situation to the processing of your personal data on the basis of a legitimate interest. In this case, the Data Controller may not further process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons which take precedence over your interests, rights and freedoms, or which are related to the submission, enforcement or protection of legal claims.

If personal data is processed for the purpose of direct business acquisition, you have the right to object at any time to the processing of personal data concerning you for this purpose, including profiling, insofar as it relates to direct business acquisition. If you opt out of the processing of personal data for the purpose of direct business acquisition, personal data may no longer be processed for this purpose.

### **Right to portability**

If the data processing is carried out automatically or if the data processing is based on the Voluntary's consent, you have the right to ask the Data Controller to receive the data you provide to the Data Controller, which the Data Controller will provide you in xml, JSON or csv format if this is technically feasible, you may request that the Data Controller transfer the data in this form to another data controller.

### **Automated decision making (not currently used)**

You have the right not to be covered by a decision based solely on automated data processing (including profiling) that would have legal effect on you or would affect you in a similar way to a significant extent. In such cases, the Data Controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request the intervention of the data subject, to express his or her views and to object to the decision.

The above does not apply if the decision:

- Necessary for the conclusion or performance of a contract between you and the data controller;
- U or Member State law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests;
- or based on your express consent.

### **Data security measures**

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, and unavailability due to changes in the technology used.

The Data Controller will make every effort to ensure that its data processors take appropriate data security measures when working with your personal data.

### **Remedies**

If, in your opinion, the Data Controller has violated any legal provision on data processing or has not complied with any of its requests, the National Data Protection and Freedom of Information Authority may initiate an investigation procedure to terminate the alleged unlawful data processing (mailing address: 1530 Budapest, Pf. : 5., e-mail: ugyfelszolgalat@naih.hu).

We also inform you that in case of violation of the legal provisions on data processing, or if the Data Controller has not complied with

any of his / her requests, he / she may file a civil lawsuit against the Data Controller in court.

#### **Modification of data management information**

The Data Controller reserves the right to amend this data management information in a manner that does not affect the purpose and legal basis of the data management. By using the website after the entry into force of the amendment, you accept the amended data management information.

If the Data Controller wishes to perform further data processing in connection with the collected data for a purpose other than the purpose of their collection, it shall inform you about the purpose of the data processing and the following information prior to the further data processing:

- the duration of the storage of personal data or, if this is not possible, the criteria for determining the duration;
- the right to request the Data Controller to access, rectify, delete or restrict the processing of personal data concerning you, and to object to the processing of personal data in the case of data processing based on a legitimate interest, and to request the right to data portability in the case of consent or contractual data processing;
- in the case of consent-based data processing, that you may withdraw the consent at any time,
- the right to lodge a complaint with the supervisory authority;
- whether the provision of personal data is based on a law or a contractual obligation or a precondition for concluding a contract, whether the person is obliged to provide personal data and what the possible consequences of non-provision of data may be;
- the fact of automated decision-making (if such a procedure has been used), including the creation of a profile, and, at least in these cases, information on the logic used and the significance of such data processing and the expected consequences for you.

The data processing can only start after that, if the legal basis of the data processing is consent, you must also consent to the data processing in addition to the information.

This document contains all relevant data management information related to the operation of the webshop in accordance with the **General Data Protection Regulation 2016/679 of the European Union** (hereinafter: Regulation. GDPR) and the 2011 CXII. TV. (hereinafter: Infotv.).