

Privacy information about the handling of personal data related to the operation of the webshop on the website hafner-pneumatika.com of the company Hafner Pneumatika Kft.

1. Purpose of the regulation:

The company Hafner Pneumatika Kft. /9228 Halászi, Püski út 3./ hereinafter referred as Company / as Data processor performs its activity related to data handling pursuant to the decree no. 112 of the year 2011 about information autonomy and information freedom /Info tv./ and the regulation no. 2016/679 of the European Parliament and Council ("GDPR"). The purpose of this statement is to inform the registered visitors and buyers of the webshop www.hafner-pneumatika.com of the Company about the data processed by the Company during the operation of the webshop and other activities arising in connection with data processing. The terms contained in this statement comply with the terms defined in the regulation no. 2016/679 of EU („GDPR”).

2. 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, organisation, 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
- „profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements
- „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 organisational 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 centralised, decentralised 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 authorised to process personal data
- “consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her
- „personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed
- „genetic data” means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question
- „biometric data” means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data
- „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
- „main establishment” means: a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment; b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation
- „representative” means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation
- „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;
- „binding corporate rules” means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;

- „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: a) the controller or processor is established on the territory of the Member State of that supervisory authority; b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or c) a complaint has been lodged with that supervisory authority;
- „cross-border processing” means either: a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State
- „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;
- „information society service” means a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council;
- „international organisation” means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

3. Principles related to the processing of personal data:

Personal data shall be processed by the Company lawfully, fairly, specified, explicit, accurate, with limited storability, confidential and in a transparent manner in relation to the data subject.

Personal data shall be:

- collected for specified, explicit and legitimate purposes
- and not further processed in a manner that is incompatible with those purposes
- adequate and relevant
- limited to what is necessary
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage

4. Data processing realized during the operation of the webshop:

Fact of data collection and purpose of data processing: Any external visitor can have access to the surface of the webshop operated on the website www.hafner-pneumatika.com of the Company and information provided by the Company. The purpose of data processing is to ensure the legitimate receipt of orders, the workmanlike performance of the transport and the issuance of invoices in accordance with the accounting regulations.

Scope of data subjects: Visitors and buyers registered in the webshop

Scope of data processed: Date, time, company name, first name, last name, title, e-mail address, phone number, invoicing name and address, tax number, delivery name and address

Legal basis of data processing: Fulfilment of purchase orders and in case of registration the § 5 of the decree no. 112 of the year 2011 about information freedom and information autonomy, § 6 art. (1) clause a) of the EU-regulation no. 2016/679 („GDPR”) and § 13/A art. (3) of the decree 108 of the year 2001 about individual questions related to information society. In case of preparation of accounting documents § 6 art. (1) clause c) of the EU-regulation 2016/679 („GDPR”).

Term of data processing: Upon receipt of the request for cancellation the personal data shall be immediately cancelled. Upon preparation of an accounting document based on § 169 art. (2) of the decree no. 100 of the year 2000 about accounting 8 years.

Rights of the data subjects related to data processing:

- The data subject shall have the right to obtain access to the personal data processed by the data processor, the correction and erasure of data and the restriction of data processing
- The data subject shall have the right to object to processing of personal data concerning him or her at the contact details contained in the statement
- The data subject shall have the right to obtain access to his or her personal data based on the rules of data portability and to withdraw his or her consent regarding data processing related to the data collected during registration.

Person of data processors entitled to know personal data and recipients of personal data: The personal data given during registration can be processed by the employees assigned by the data processor for marketing activities

Persons entitled for the erasure, modification or restriction of the processing of personal data:

- Sales and marketing manager. Postal address: HAFNER Pneumatika Kft., Püski út 3., H-9228 Halászi. E-mail address: info@hafner-pneumatika.com, Phone number: +36 30 508 5791
- Sales assistant. Postal address: HAFNER Pneumatika Kft., Püski út 3., H-9228 Halászi. E-mail address: info@hafner-pneumatika.com. Phone number: +36 30 692 3162

5. Data processing realized during newsletter submission:

Fact of data collection and purpose of data processing: During the registration in the webshop on the website www.hafner-pneumatika.com of the Company the user can give his/her consent in advance that the service provider can submit his/her actual offers in electronic or paper-based newsletter at the contacts indicated during the registration. In lack of registration the Company shall not submit any advertisement message; the registered user can unsubscribe the newsletter submission orally, on electronic and postal way. For the newsletter registration the privacy declaration indicated on the website shall be accepted.

Scope of data subjects: visitors and customers, who have given their consent to newsletter submission in our webshop

Scope of data processed: Date, time, first name, last name, e-mail address, phone number

Legal basis of data processing: In case of subscription for newsletter the § 5 of the decree no. 112 of the year 2011 about information freedom and information autonomy, § 6 art. (1) clause a) of the EU-regulation no. 2016/679 („GDPR”) and § 6 art. (5) of the decree no. 48 of the year 2008 about basic conditions and individual limits of economic advertisement activities.

Term of data processing: Upon receipt of the request for cancellation the personal data shall be immediately erased.

Rights of data subjects related to data processing:

- The data subject shall have the right to obtain access to the personal data processed by the data processor, the correction and erasure of the data and the restriction of data processing
- The data subject shall have the right to object to processing on personal data concerning him or her at the contacts indicated in this statement
- The data subject shall have the right to access to the personal data concerning him or her and to withdraw the consent related to data processing based on the rules of data portability and regarding the data provided during newsletter registration.

Person of data processors entitled for knowing personal data and recipients of personal data: The personal data provided during registration can be processed by the employees of the data processor appointed for marketing activities

Persons entitled for the erasure, modification or restriction of personal data:

- Sales and marketing manager. Postal address: HAFNER Pneumatika Kft., Püski út 3., H-9228 Halászi. E-mail address: info@hafner-pneumatika.com, Phone number: +36 30 508 5791
- Sales assistant. Postal address: HAFNER Pneumatika Kft., Püski út 3., H-9228 Halászi. E-mail address: info@hafner-pneumatika.com. Phone number: +36 30 692 3162

6. Personal data processing in case of quality objection:

Fact of data collection and purpose of data processing: Registration of personal data of persons raising quality objections regarding the product ordered in the webshop on the website www.hafner-pneumatika.com of the Company, handling of the problems arising.

Scope of data subjects: Persons raising objection related to the product purchased

Scope of data processed: first name, last name, e-mail address, phone number, invoicing name, address, tax number

Legal basis of data processing: the § 5 of the decree no. 112 of the year 2011 about information freedom and information autonomy, § 6 art. (1) clause c) of the EU-regulation no. 2016/679 („GDPR”) and the § 17/a art. (7) of the decree no. 155 of the year 1997 about consumer protection

Term of data processing: The protocol recorded shall be retained by the data processor 5 years based on § 17/A of the decree no. 155 of the year 1997 about consumer protection.

Rights of data subjects related to data processing:

- The data subject shall have the right to obtain access to the personal data processed by the data processor, the correction and erasure of the data and the restriction of data processing
- The data subject shall have the right to object to processing on personal data concerning him or her at the contacts indicated in this statement
- The data subject shall have the right to access to the personal data concerning him or her and to withdraw the consent related to data processing based on the rules of data portability and regarding the data provided during newsletter registration.

Person of data processors entitled for knowing personal data and recipients of personal data: The personal data provided during the submission of the quality objection can be processed by the employees of the data processor appointed for marketing activities

Persons entitled for the erasure, modification or restriction of personal data:

- Sales and marketing manager. Postal address: HAFNER Pneumatika Kft., Püski út 3., H-9228 Halászi. E-mail address: info@hafner-pneumatika.com, Phone number: +36 30 508 5791
- Sales assistant. Postal address: HAFNER Pneumatika Kft., Püski út 3., H-9228 Halászi. E-mail address: info@hafner-pneumatika.com. Phone number: +36 30 692 3162

7. Data processing and joint data controlling during the usage of the webshop and the operation of the newsletter submission service:

During the operation of the webshop the controller shall exclusively avail of data processors and joint controllers, which provide guarantees for the compliance with the requirements of the EU-regulation 2016/679 and the performance of appropriate technical and organizational measures ensuring the protection of the rights of the data subjects. The Parties have transparently defined during the data collection and joint data processing the distribution of their responsibility in connection with their tasks existing for the fulfilment of obligations related to the exercise of the rights of the person concerned by data processing in a written agreement. The Company avails of the following data processors and employs the following joint controllers for the operation of the webshop and newsletter submission service:

- Transportation /collective data processing/: GLS General Logistics Systems Hungary Csomaglogisztikai Kft 2351 Alsónémedi, GLS Európa u 2.

- Technical background support of newsletter submission service / Data processing /: Sales Autopilot Kft 1024 Budapest, Margit krt. 31-33 félemelet 4.
- Webshop operation, technical background support / Data processing /: Dimarker Kft 2100 Gödöllő, Ottó Ferenc utca 22/A
- Hosting, technical background support / Data processing /:Archi-Host Kft. 1143 Budapest, Francia út 41,

8. Application of Google Analytics:

- During the operation of the Webshop the data processor avails of the application of Google Analytics, which is a web-analyzing service of Google Inc. („Google”). Google Analytics uses so called „cookies”, text files, which are stored on the computer of the User, promoting the analysis of the usage of the website visited by the User.
- The information established with cookies related to the website used by the User is normally stored on a server of Google in the USA. With the website activation of IP-anonymisation Google previously shortens the IP-address of the User within the member states of the European Union or in other states participating in the agreement about European Economic Area.
- A forwarding and shortening of the whole IP-Address to the Google-Server in the USA is performed only in exceptional cases. On behalf of the operator of this website Google shall use this information to evaluate, how the User has used the website, further to prepare reports for the operator of the website in connection with the website activity and to provide further services related to the website- and Internet-usage.
- Within the frame of Google Analytics the IP-address forwarded by the browser of the User shall not be combined with other data of Google.
The User can prevent the storage of cookies with appropriate adjustment on his/her browser. The User can prevent that Google collects and processes his/her data via cookies, related to the website usage by the User (including the IP-address), if the following browser plug-in from the following link is downloaded and installed. <https://tools.google.com/dlpage/gaoptout?hl=hu>

9. Other rights of data subjects concerning data processing:

- **Right of access**

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data collected by the data processor.

- **Right to rectification**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of

the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- **Right to erasure**

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay in case of the conditions defined by the § 17 art. (1) of the EU-regulation 2016/679.

- **Right to be forgotten**

Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

- **Right to restriction of processing**

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

- **Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant to point (a) of Article 6 (1) and the processing is carried out by automated means.

- **Right to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point a) of Article

6 (1), including profiling based on those provisions. In this case the controller shall no longer process the personal data.

- **Automated individual decision-making, including profiling**

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The previous paragraph shall not apply if the decision:

- is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent

10. Action due dates related to the data processing of the webshop:

The Company provides information within 1 month after receipt of the request about the measures taken along the requests related to data processing. This deadline can be elongated by 2 months in case of justified reason. The data processor shall inform about the elongation of the deadline by indicating the reasons of the delay within 1 month upon receipt of the request. In case the data processor does not take any measures upon the request of the data subject, he/she shall without delay, however within one month upon receipt of the request provide information about the reason of the omission of the measure and the way of complaint management, which can be submitted to the supervisory authority and the court.

11. Security of data processing:

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

12. Management of cookies:

This Cookie regulation (hereinafter referred as cookie) contains the cookie provisions related to the usage of the website www.hafner-pneumatika.com operated by Hafner Pneumatika Kft. Upon

development of the website we have observed the provisions related to further usage of cookies. Accordingly we have considered the following requirements and cookies are used according to these:

Decree no. 100 of the year 2003 about electronic communication

Decree no. 108 of the year 2001 about individual matters of electronic commercial services and services related to the information society

Decree no. 112 of the year 2011 about information autonomy and information freedom

Directive 2002/58/EC (July 12, 2002) about handling, processing of personal data in electronic communication branch and the protection of privacy ("Privacy and Electronic Communication Directive")

Please read the document carefully and avail of our service, in case you agree with every single clause thereof and accept them as obligatory for you (hereinafter referred as User). We draw your attention that this regulation concerns only the handling of cookies on the website hafner-pneumatika.com.

The cookie

Meaning of cookie: files or information pieces, which are saved and stored by your Internet browser on your computer. The server computer storing the materials of our website recognizes by means of these cookies upon your repeated visit of our website, that you have already visited our website.

The most Internet browser accepts cookies as default adjustment. If you think, you can readjust your computer to refuse cookies or to warn you if cookies are sent to your computer. Our website uses such cookie-files in order to ensure individual functions or only for convenience. The cookies used by us do not load, retard and damage your computer.

On the website also cookies originating from third parties are used. The cookies can be deleted from browsers; further these can be also blocked. You can find further information about these adjustments on the official website of the browser.

What is the purpose of cookies?

These technologies can be used for several purposes, for example to display the most relevant content or advertisement for the User, to further develop our products and services and to retain the security of our services. The exact name of the cookies, pixels and other similar technologies may change with the improvement and update of the services from time to time.

How does a cookie come to being?

First the client computer sends a request to the server. Then the server establishes an individual identification and stores it in its own database, and then the cookie established in this manner is returned to the client with all the information. The information cookie received is stored on the client computer.

How is a cookie used?

When the client computer contacts the server again, it attaches the previously established and stored cookie. The server compares the content of the cookie received and stored. So for example a registered or returning user can be easily identified.

What kind of cookies do we use?

There are several cookies in use, but every website uses different types. Our website generally uses below cookies, but upon developments it can occur that we apply new sorts above these.

Workphase/Temporary cookie:

These cookies are only temporarily stored in the temporary memory, until the user navigates on the website. When the user closes the browser, the cookie is erased. These cookies do not contain any personal data and are not suitable for the identification of the user.

Stored/Persistent cookie:

These are cookies, which are always used, when the user visits a website. Based on cookie types these can be used as follows:

Analytics/Analysis:

It shows, what have you visited within the website, which products have you seen and what have you done. Depending on its lifetime the cookie remains on the client computer. Functions can use it such as Google Analytics. These cookies do not contain any personal data and are not suitable for the identification of the visitor.

Social media networks:

It allows you to easily access to social media networks, share your opinion and our articles with others. Functions provided by third parties can use it such as Facebook, YouTube. These cookies may contain personal data and are suitable for the identification of the visitor.

Media:

By means of these you can for example watch videos on the website. Functions provided by third parties can use it such as YouTube. These cookies do not contain any personal data and are not suitable for the identification of the visitor.

Functional:

It shows, whether the user has already visited the website and with which device. It notes the user name, password, the selected language and residence information. These cookies may contain personal data and are suitable for the identification of the visitor.

Advertisement:

By means of these we can send information, newsletters to the user corresponding with the interest thereof. These cookies may contain personal data and are suitable for the identification of the visitor.

How are cookies handled?

On different ways, but the client has the possibility to adjust the browser differently related to handling of cookies. Generally it can be stated that browsers can be adjusted in three ways as follows:

- Accept every cookie
- Refuse every cookie
- Request for notification about every single cookie use

Regarding cookie settings it is advisable to look around in the menu "Options" or "Settings" or to avail of the menu "Help" of your browser.

It is important to note that the website was prepared with cookie handling, In case the client partially or fully blocks the usage of cookies, it can prevent the operation of the website. If this is the case, there can be functions and services, which partially or fully cannot be used.

On the website we use cookies in order to facilitate the following:

Display, selection, evaluation, measurement and interpretation of advertisements displayed on the website and elsewhere.

If there are cookies in the browser or in the device, we can read the particular cookie, when you visit a website with social module. For cookies established by social media sites (Facebook) the operator of the websites shall be responsible, you can receive further information on the website of the particular social media site.

13. Information of data subject about personal data breach and notification of the breach to supervisory authority:

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

In case the personal data breach is supposed to be connected with high risk regarding the rights and freedom of data subjects, the controller shall inform the data subject without undue delay about the personal data breach.

14. Remedy possibilities:

In case of personal data breach of the data subject during data processing he/she can lodge a complaint with the following Authority:

- Nemzeti Adatvédelmi és Információszabadság Hatóság: 1530 Budapest, Szilágyi Erzsébet fasor 22/C
 - Phone number: +36-1-391-1400
 - E-mail: ugyfelszolgalat@naih.hu
- I have read the privacy statement and I give my consent to the processing of my personal data.
- I have read the privacy statement and I give my consent to the electronic and postal submission of newsletters.