

Data protection

PRIVACY POLICY

(hereinafter also referred to as the "Prospectus" or the "Privacy Statement")

1. Basic provisions

1.1. History

The new Data Protection Regulation 2016/679 of the European Union (General Data Protection Regulation, GDPR, hereinafter: the "Regulation" or "GDPR") becomes / becomes directly applicable in Hungary as well. The Company qualifies as a data controller within the meaning of the Decree, ie the Decree also applies to personal data managed by the Company.

1.2 Purpose of the Prospectus

The purpose of the Prospectus is to establish the data protection and data management provisions, principles, and the Company's data protection and data management policy followed and applied by Szeleshát Borászat Kft. (hereinafter also referred to as the "Data Controller" or the "Company").

1.3 Legislation

In determining the content of the Prospectus, the Company took into account, in addition to the Decree, the provisions of Act CXII of 2011 on the right to information self-determination and freedom of information. ("Information Act"), Act V of 2013 on the Civil Code ("Civil Code"), as well as Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities. provisions of the Act ("Grtv.").

1.4 Scope

The scope of this Data Management Prospectus covers data management related to the website available at www.szeleshat.hu (hereinafter: the "Website") and the commercial activities of the Company.

Unless otherwise stated, the scope of the Prospectus does not cover the services and data management related to the promotions, sweepstakes, services, other campaigns of the third parties advertising on the Website or otherwise appearing on it, or the content published by them.

Unless otherwise stated, the scope of the Prospectus does not cover the services and data management of websites, service providers to which the link on the Websites leads. The scope of the Prospectus does not cover the data management of persons (organizations, companies) from whose information, newsletter or advertising letter the Data Subject has learned about the Website.

1.5. Amendments to the Prospectus

1.5.1. The Company reserves the right to amend the Prospectus by unilateral decision.

1.5.2. By accessing the Website, the Data Subject accepts the provisions of the Prospectus in force at any time, further consent of the Data Subject is not required, unless otherwise provided in the Prospectus.

2. Concept definitions

The terms used in this Privacy Notice have the following meanings:

- 2.1. Data management: any operation or set of operations on personal data or data files, whether automated or non-automated, such as collecting, recording, organizing, segmenting, storing, transforming or altering, querying, viewing, using, communicating, transmitting, distributing or otherwise making available harmonization or interconnection, restriction, deletion or destruction.
- 2.2. Data controller: any natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.
- 2.3. Personal data or data: any information relating to an identified or identifiable natural person ("data subject"); identify a natural person who, directly or indirectly, in particular by an identifier such as name, number, location, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable.
- 2.4. Data Processor: a natural or legal person, public authority, agency or service provider who processes personal data on behalf of the Data Controller.
- 2.5. Data subject: the natural person who provides personal data or whose personal data is made available to the Company.
- 2.6. External Service Provider: third party service partners used by the Data Controller or the Website Operator in connection with the provision of certain services, either directly or indirectly, to whom Personal Data is or may be transferred in order to provide their services, or who provide Personal Data to the Company. may be transmitted. External service providers are also those service providers who do not cooperate with the Company or the service operators, however, by accessing the Website, they collect data about the Stakeholders, which may be suitable for the identification of the Stakeholder, either independently or in combination with other data. When providing the hosting service, the Company also considers the Data Subject to be an External Service Provider for the purposes of the data management activities carried out on the hosting space used by it.
- 2.7. Prospectus: this data management prospectus of the Company.

3. Person and activity of the data controller

Name: Szeleshát Borászat Kft.

Headquarters: 7140 Bátaszék-Lajvér, Hegyalja utca 2.

Company registration number: Cg.17-09-009534

Phone: +3674506156

E-mail: szeleshat@szeleshat.hu

Data protection officer: Pursuant to the Decree, the Company is not obliged to appoint a data protection officer

Position of Data Protection Officer: -

The Data Controller is a company registered in Hungary.

The Data Controller operates the Website, which was created for the purpose of purchasing Szeleshát products online, has a commercial relationship with suppliers and customers, and may also operate commercial units.

4. Basic principles of data management

4.1. Legality, fairness

The processing of data must be carried out lawfully and fairly and in a way that is transparent to the data subject. The Company only handles the data specified by law or provided by the Stakeholders or their employers / clients / customers, for the purposes specified below. The scope of the Personal Data processed is proportionate to the purpose of the data management and may not extend beyond it.

4.2 Accuracy

The data must be necessary and relevant for the purposes of data management and must be accurate and, where necessary, kept up to date.

4.3. Purposefulness

In all cases where the Company intends to use the Personal Data for a purpose other than the purpose of the original data collection, it shall inform the Data Subject thereof and obtain its prior express consent, or provide him or her with an opportunity to prohibit the use.

4.4. Appropriateness

The Company does not verify the Personal Data provided to it. The person who provided it is solely responsible for the adequacy of the Personal Data provided.

4.5 Limited storage capacity

It must be 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.

4.6. Protection of the data of persons under the age of 16

The relevant Personal Data of a person under the age of 16 may only be processed with the consent of an adult exercising parental supervision over him or her. The Company is not in a position to verify the entitlement of the consenting person or the content of his / her statement, so the data subject or the person exercising parental supervision over him / her guarantees that the consent complies with the law. In the absence of a consent statement, the Company will not collect Personal Data relating to a person under the age of 16.

4.7. The Company will not transfer the Personal Data managed by it to third parties other than the Data Processors and External Service Providers specified in the Prospectus.

The processing of data must be carried out in such a way as to ensure the adequate security of personal data by applying appropriate technical and / or organizational measures.

An exception to the provision contained in this section is the use of the data in a statistically aggregated form, which may not contain any other data suitable for the identification of the Data Subject in any form.

In certain cases, the Company - a formal court or police request, legal proceedings due to copyright, property or other infringements or their reasonable suspicion of harming the interests of the

Company, endangering the provision of the service, etc. - make the available Personal Data of the Data Subject available to third parties.

4.8. The Company shall inform about the correction or restriction of the Personal Data managed by it. notifies the Data Subject of the deletion, as well as notifies all those to whom the Personal Data has previously been transferred for the purpose of Data Management. The notification may be omitted if it does not infringe the legitimate interests of the Data Subject with regard to the purpose of the Data Management.

4.9. Pursuant to the Decree, the Company is not obliged to appoint a data protection officer, as the Company does not qualify as a public authority or body performing public tasks, the Company's activities do not include operations that require regular and systematic monitoring of data subjects. personal data relating to decisions on criminal liability and criminal offenses.

5. Legal basis for data management

5.1 Article 6 of the GDPR states in which cases the personal data of data subjects may be processed:

"(A) the data subject has consented to the processing of his or her personal data for one or more specific purposes;

(b) processing is necessary for the performance of a contract to which the party concerned is subject or in order to take steps at the request of the data subject prior to the conclusion of the contract;

(c) processing is necessary for compliance with a legal obligation to which the controller is subject;

(d) the processing is necessary in order to protect the vital interests of the data subject or of another natural person;

(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

(f) processing is necessary for the protection of the legitimate interests of the controller or of a third party, unless those interests take precedence over the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the child concerned. "

5.2. Taking into account the nature of the Company's activities, the legal basis for data management is primarily the voluntary, explicit consent of the Data Subject (Section 5 (1) (a) of the Information Act), any contractual relationship between the Company and the Data Subject or its employer / principal / customer. during or after the preparation of the obligation, point 5.1.b) of the Decree above and point 5.1.c) of the Decree above. in the case of areas monitored by the camera, point 5.1.d) of the Regulation above. The Data Subject contacts the Company voluntarily, either in the performance of a task performed for his / her employer / principal / customer, or registers voluntarily or uses the services of the Company voluntarily. In the absence of the consent of the Stakeholders, the Company will only process data if it is expressly authorized to do so by law.

5.3 If the processing is based on consent, the controller must be able to prove that he or she has consented to the processing of the data subject's personal data.

5.4. The Data Subject is entitled to withdraw his or her consent at any time in respect of any data processing for which the Regulation is based on point 5.1.a) of the Regulation. Withdrawal of consent does not affect the lawfulness of data processing based on consent and before withdrawal and in accordance with points 5.1.b) and / or c) and / or 5.1.d) of the Regulation above.

5.5. The Transfer of Data to the Data Processors specified in the Prospectus may be carried out without the separate consent of the Data Subject. The release of personal data to a third party or to authorities, unless otherwise provided by law, is only possible on the basis of a final official decision or with the prior express consent of the Data Subject.

5.6. Surveillance cameras are operated in the premises operated by the Company, which are open to customer traffic, as well as in the warehouse premises for property protection purposes. The legal basis is Article 6 (1) (d) of the Regulation.

5.7. When accessing the individual websites by the User, the Data Controller shall use the User's IP address in connection with the provision of the service, taking into account the legitimate interest of the Data Controller and lawfully providing the service (eg for illegal use or illegal content), without the User's consent. records.

5.8. When providing the e-mail address of any User and the data provided during registration (eg user name, ID, password, etc.), it is also responsible for ensuring that the e-mail address provided or using the data provided by him, he only uses the service. In view of this responsibility, all liability in connection with access to a given e-mail address and / or data shall be borne solely by the User who registered the e-mail address and provided the data.

6. Purpose of data management

The processing of data must be carried out lawfully and fairly and in a way that is transparent to the Data Subject. The Company strives to process only personal data that is essential for the realization of the purpose of the data processing and is suitable for achieving the purpose. Personal data may only be processed to the extent and for the time necessary to achieve the purpose.

The main purpose of data management is to operate the Website and to provide the services of the Data Controller, to establish and fulfill commercial and contractual relations.

The purpose of data management is based on the above:

- Identification of the Data Subject, contact with the Data Subject
- Preparation of the contract concluded during the purchase on the Website, fulfillment of the contractual obligations by the Data Controller, enforcement of his rights;
- provide the Data Subject with concise, transparent, comprehensible and easily accessible information
- the conclusion and performance of legal transactions between the Company and the Data Subject that fall within the scope of the Company's activities
- in case of using a service subject to fee payment, collection of the fee, invoicing
- fulfillment of the obligations incumbent on the Data Controller, exercise of the rights of the Data Controller
- preparation of analyzes, statistics, development of services - for this purpose the data controller uses only anonymized data, aggregates unsuitable for personal identification
- Advertising, research with the special consent of the Data Subject
- protection of the rights of the Data Subject.

7. Source of data

The Company handles only the Personal Data provided by the Stakeholders or legal entities using the services (work) of the Stakeholders in order to prepare / execute the transaction, and does not collect data from other sources.

The data is provided during the registration of the Data Subject. During registration, the Data Subject provides his / her name, e-mail address and password.

If the Data Subject registers for a promotion organized by the Data Controller and provides his / her data, he / she consents to the processing of his / her personal data in accordance with the information of the given promotion. In this case, the Data Controller only handles the data provided during the promotion.

8. Scope of managed data

The Company handles only the personal data provided in accordance with clause 8. The data processed are as follows:

The data managed by the Company can be divided into the following groups based on the purpose of data management:

- Data required for registration: As part of the registration required for purchases on the Website, you will be able to make purchases from the webshop by providing the Recipient's last name, first name, e-mail address, password, telephone number and club membership number.
- Data provided during marketing inquiries: During marketing inquiries made by the Company, the Data Subject provides his / her name, e-mail address, telephone number and residential address. The legal basis of the data management is the consent of the Data Subject, the primary purpose of the data management is the contact, information, newsletter for marketing purposes or the XLVIII. TV. Sending a direct request pursuant to Section 6 (1).
- Data of suppliers: the Company provides the name, e-mail address and telephone number of the Data Subject in the course of business cooperation with its suppliers and, in the case of data management, of the Data Subject or its employer / principal / customer. The legal basis for data management is the fulfillment of contracts and the fulfillment of a legal obligation.
- Data provided during public opinion polls: during public opinion polls conducted by the Company, the data provided by the Data Subject will be managed, recorded and used later. The Company is entitled to process such data in accordance with Article 9 (2) (e) of the GDPR.
- Uploaded documents. The Data Subject has the possibility, in some cases the obligation, to upload pictures of certain personal documents). The Company recommends that personal data not required for the conclusion of a legal transaction between the parties and not requested by the Company be deleted from these documents (as described in point 10 below). If the Data Subject publishes a document containing a document containing personal data, the legal basis of the data processing is the data subject's consent. In the case of photographs, the purpose of data management is to provide the services of the Website.
- Billing information. If the Data Subject pays for the Company, the Company manages the data related to payment and invoicing (method of payment, data of the means used for payment, in case of invoicing, the name, address, tax number of the customer). The legal basis of data management is

partly the consent of the Data Subject and partly the legislation on taxation and accounting. The purpose of data management is invoicing and collection of fees.

Data and documents provided during authentication. The Stakeholders have the opportunity, in the cases specified by the Company, the obligation to authenticate themselves, as described in point 11 below. The records will be handled as described in point 11. The purpose of data management is to control the data subject.

In addition to the above, the Company manages the technical data, including the IP address, as described in Section 13.

9. Description of the data management process

The source of the data is the Data Subject or the legal entity in an employment / commission / business relationship with him / her who provided the data (i) during any registration and / or (ii) during the preparation, creation or execution of the legal transaction and / or (iii) the newsletter or XLVIII of 2008 TV. When making a statement in connection with a direct request pursuant to Section 6 (1). The information on the registration form is mandatory, unless explicitly stated otherwise.

The Data Subject provides the data independently, the Company does not provide any mandatory guidelines in this regard, and does not set any content expectations. The Data Subject expressly consents to the processing of the data provided by him. The Data Subject is entitled to provide other data in its profile in addition to the data requested by the Company, the legal basis for the processing of the data in this case is also the voluntary consent of the Data Subject.

If the Data Subject registers for a promotion organized by the Company (eg on Facebook) and provides the data requested there, he / she accepts the data management information related to the given promotion. In this case, by providing the data, the Data Subject does not register on the Website, but agrees to the processing of the data provided as specified in the promotional information.

10. Document management

There is an option on the Website, in case of a mandatory invitation on the Website, there is an obligation for the Data Subject to provide the Company with his / her personal documents in order to facilitate the conclusion of a legal transaction between the parties.

Unless required by the Company, the Data Subject has the possibility to publish the documents by deleting the personal data. If the Data Subject does not delete the data, he / she consents to the disclosure of the data in case of publication.

If the Company does not require the disclosure of documents with personal data and provides the possibility to delete the data, the Company shall not be liable for any such disclosure.

11. Authentication

The purpose of the authentication process is to enable the Company to verify the authenticity of the data subject. The Company verifies that the Data Subject indicating the indicated intention to enter into a contract is in fact a natural person. After the inspection, the Company deletes the photos and data from the Website, however, they store them in another storage location until the legal basis of

the data management ceases. The purpose of data management is to authenticate the Stakeholders and to establish and legally execute the legal transaction after its conclusion.

12. Data management for advertising purposes, sending newsletters

If the Data Subject agrees, the Company will contact the Data Subject at the given contact details and send it an advertisement by the direct inquiry method. The advertisement may be sent by post, telephone (including SMS) or e-mail (including Messenger), subject to the consent of the Data Subject. The Data Subject may withdraw his consent at any time without giving reasons.

13. Cookies

The Company's system may automatically record the IP address of the Data Subject's computer, the start time of the visit and, in some cases, the type of browser and operating system, depending on the computer's settings. The data thus recorded may not be combined with other personal data. The processing of the data is for statistical purposes only. Cookies allow the Website to identify, identify and record previous visitors. Cookies help the Company, as the operator of the Website, to optimize the Website, to design the services of the Website in accordance with the custom of the Stakeholders. Cookies are also suitable for

- memorize the settings so that the Data Subject does not have to save them again when entering a new page.
- they remember previously entered data, so they do not have to be re-typed,
- analyze the use of the website in order to ensure that, as a result of the improvements made using the information thus obtained, it works as far as possible in accordance with the expectations of the Data Subject, the data subject can easily find the information sought, and
- Monitor the effectiveness of our ads.

If the Company displays various content on the Website with the help of external web services, it may result in the storage of some cookies that are not controlled by the Company, so it has no influence on what data these websites or external domains collect. These cookies are described in the regulations for the given service.

The Company uses cookies to serve advertisements to Stakeholders via Google and Facebook. Data management takes place without human intervention.

The Data Subject has the option to delete cookies in their browser (usually in the privacy section of the settings). By disabling the use of cookies, the Data Subject acknowledges that without a cookie the operation of the Website is not complete.

14. Data transmission

The Company transfers personal data to a third party only if the Data Subject has explicitly consented to it - knowing the scope of the transferred data and the recipient of the data transfer - or gives a legal authorization for the data transfer.

The Company is entitled and obliged to transfer all Personal Data at its disposal and duly stored by it to the competent authorities, which is obliged to transfer Personal Data by law or a final official obligation. The Company cannot be held liable for such Transfer of Data and the consequences thereof.

The Company documents the data transfers in all cases and keeps a record of the data transfers.

By purchasing with the affected bank card, you acknowledge that the user ID stored by the Data Controller in the user database of the Website will be transferred to the

for the data processor.

15. Tasks related to data security

The Company ensures the security of the data, takes the technical and organizational measures and establishes the procedural rules necessary to enforce the applicable legislation, data and confidentiality rules. The Company shall protect the data by appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, as well as becoming inaccessible due to changes in the technology used.

The Company and the data processor are the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of data management, as well as the interests of natural persons.

take appropriate technical and organizational measures to ensure a level of data security commensurate with the level of risk, taking into account the varying likelihood and severity of the risk to his rights and freedoms.

In the framework of the above:

- provides measures to protect against unauthorized access, including the protection of software and hardware devices and physical protection (access protection, network protection);
- take measures to ensure the possibility of restoring data files, from regular backups;
- take measures to protect against viruses.

16. Duration of data management

The Company deletes the Personal Data,

a) If it turns out that the processing of data is unlawful, the Company will carry out the deletion immediately.

b) If requested by the Data Subject (except for statutory data processing).

The data subject may request the deletion of data processed on the basis of the data subject's voluntary consent. In this case, the Company will delete the data. Deletion can only be refused if the processing of the data is authorized by law. The Company will always provide information on the refusal of the cancellation request and on the legislation enabling data processing.

c) If it becomes known that the data is incomplete or incorrect - and this condition cannot be legally remedied - provided that deletion is not precluded by law.

d) If the purpose of data processing has ceased or the term for storage of data specified by law has expired;

Deletion may be refused (i) if the processing of Personal Data is authorized by law; and (ii) necessary for legal protection and enforcement.

e) It has been ordered by a court or the National Data Protection and Freedom of Information Authority

If a court or the National Data Protection and Freedom of Information has finally ordered the deletion of the data, the deletion shall be carried out by the Data Controller.

Instead of deleting, the Company shall, in addition to informing the Data Subject, block the personal data if the Data Subject so requests or if, on the basis of the information available to it, it can be assumed that the deletion would harm the Data Subject's legitimate interests. Personal data blocked in this way may only be processed for as long as the purpose of the data processing, which precluded the deletion of personal data, exists. The Company shall mark the personal data processed by it if the Data Subject disputes its correctness or accuracy, but the inaccuracy or inaccuracy of the disputed personal data cannot be clearly established.

In the case of data processing ordered by law, the deletion of data is governed by the provision of law.

In case of deletion, the Company will make the data unfit for personal identification. If required by law, the Company will destroy the data carrier containing personal data.

The Company shall in all cases inform the Data Subject of the refusal of the cancellation request, indicating the reason for the refusal of the cancellation. Once the request for deletion of personal data has been fulfilled, the previous (deleted) data can no longer be recovered.

Newsletters sent by the Company may be unsubscribed via the unsubscribe link contained therein. In case of unsubscription, the Company will delete the Personal Data of the Data Subject in the newsletter database.

17. Data subjects' rights related to data management

17.1. The Company informs the Data Subject about the handling of the data at the same time as the contact. In addition, the Data Subject has the right to request information on data management at any time.

The Data Subject is entitled to receive feedback from the Company on whether the processing of his / her personal data is in progress, and if such data processing is in progress, he / she is entitled to receive access to personal data and information on the purpose of data processing, categories of personal data concerned, the recipients or categories of recipients to whom or with whom the personal data have been or will be communicated, the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period. The Data Subject has the right to request the controller to rectify, delete or restrict the processing of personal data concerning him or her and to object to the processing of such personal data. They shall also have the right to lodge a complaint with a supervisory authority or, if the data have not been collected from the data subject, any available information as to their source.

17.2. The Data Subject has the right to have inaccurate personal data concerning him / her corrected at his / her request without undue delay. Taking into account the purpose of the data processing, the data subject has the right to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary statement.

17.3. The Data Subject may request the Company to delete personal data concerning him / her without undue delay, except for the data processing prescribed by law. The Company shall inform the Data Subject of the cancellation.

17.4. The Data Subject may object to the processing of his / her personal data as specified in the Information Act.

17.5. The Data Subject may submit his / her request for information, correction or deletion in writing, in a letter addressed to the registered office or premises of the Company, or in an e-mail sent to the Company at szeleshat@szeleshat.hu.

17.6. The Data Subject may request that the processing of his / her Personal Data be restricted by the Company if the Data Subject disputes the accuracy of the Personal Data processed. In this case, the restriction applies to the period of time that allows the Company to verify the accuracy of the Personal Data. The Company will flag the Personal Data processed by it if the Data Subject disputes its correctness or accuracy, but the inaccuracy or inaccuracy of the disputed Personal Data cannot be clearly established.

The Data Subject may request that the processing of his / her Personal Data be restricted by the Company even if the Data Processing is illegal, but the Data Subject objects to the deletion of the processed Personal Data and instead requests a restriction on their use.

The Data Subject may request the restriction of the processing of his / her Personal Data by the Company even if the purpose of the Data Processing has been achieved, but the Data Subject requires the Company to process them in order to submit, enforce or protect legal claims.

17.7. The Data Subject shall have the right to receive personal data concerning him or her made available to a data controller in a structured, widely used machine-readable format and to transfer such data to another data controller without being hindered by the data controller whose provided the personal data to him.

17.8. If the Company does not comply with the Data Subject's request for rectification, blocking or deletion, it shall, within 30 days of receipt of the request, communicate in writing the reasons for rejecting the request for rectification, blocking or deletion. In the event of a rejection of a request for rectification, erasure or blocking, the controller shall inform the Data Subject of the possibility of legal redress and recourse to the National Data Protection and Freedom of Information Authority.

17.9. The Data Subject may make the above statements regarding the exercise of his / her rights at the contact details of the data controller written in point 2.

17F.10. The Data Subject may file a complaint directly with the National Data Protection and Freedom of Information Authority (address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c .; phone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu) is. In case of violation of the rights of the Data Subject's right holder, Infotv. To apply to a court pursuant to Section 22 (1). The trial falls within the jurisdiction of the tribunal. The lawsuit may also be instituted before the court of the data subject's place of residence or stay, at the choice of the Data Subject. Upon request, the Data Controller shall inform the Data Subject in detail about the possibility and means of legal remedy.