

PRIVACY STATEMENT

1. PREAMBLE

1.1. Basic information

- 1.1.1. The present Privacy Statement contains information on the principles and rules of data management followed by Alienline Kft., as well as information regarding the termination of data processing.
- 1.1.2. The Privacy Statement is available on the following website: <http://alienline.eu/web/adatvedelmi-nyilatkozat>.
- 1.1.3. The aim of the Privacy Statement is to comply with the (EU) Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and the repealing Directive 95/46/EC (General Data Protection Regulation). (The General Data Protection Regulation will hereinafter be referred to by the English acronym GDPR)
- 1.1.4. Alienline Kft. manages the personal data provided by its Data Subjects responsibly and in accordance with the GDPR.
- 1.1.5. In accordance with the GDPR, we hereby inform our Data Subjects on the details of data management, which are also available at our company for our Data Subject to study.
- 1.1.6. The disagreement with the present Privacy Statement constitutes an obstacle to the use of this website, even if Data Subject only visits the website operated by Contractor and reads its content. In case Data Subject does not agree with the present regulation, Data Subject is not entitled to use the website owned by the Contractor.
- 1.1.7. The Contractor retains all rights regarding the present website.
- 1.1.8. The present English translation has been prepared on a voluntary basis, with the best care and intention of the Contractor to inform English speaking Data Subjects, however, in the event of any discrepancy between the Hungarian and English versions, the original Hungarian version shall prevail.
- 1.1.9. The Privacy Statement was last modified on 1 February 2019.

1.2. Contractor / Data Controller

- 1.2.1. Name: **Alienline Kft.**
- 1.2.2. Headquarters: **6729 Szeged, Szabadkai út 9/A**
- 1.2.3. Mailing address: **6729 Szeged, Szabadkai út 9/A**
- 1.2.4. Telephone number: **+36-62/541-651**
- 1.2.5. Fax number: **+36-62/439-284**
- 1.2.6. E-mail address: **alienline@alienline.eu**
- 1.2.7. Website: **<http://www.alienline.eu>**
- 1.2.8. Office hours: **Monday – Friday 8:00–16:30**

1.3. Definitions

1.3.1. **Data Subject.** Any given natural person identifiable or identified through personal data, including all clients that order or purchase any goods or services falling within the scope of activities of Contractor, clients that enter into a contract of sale with Contractor, as well as clients that have Contractor carry out any activity by means of which Contractor offers any products, goods or services to Data Subject in return for financial compensation.

1.3.2. **Personal data:** any information relating to an identified or unidentified natural person, to a Data Subject and any information pertinent to him or her (in particular the name, identification numbers, one or more pieces of information specific to the physical/physiological/mental/economic/cultural or social identity of Data Subject), as well as any conclusions that may be drawn from these identifiers with regard to 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 one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).

1.3.3. **Data set:** all the data managed in one register.

- 1.3.4. **Data management.** any operation (or set of operations) which is performed on personal data (or on sets of personal data), irrespective of the means of the operation performed. These set of operations may include: collection, registration, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, retrieval, transmission, disclosure through dissemination or otherwise making available, alignment, combination, restriction, blocking, erasure, destruction, as well as blocking the data from further use, photographing, sound and video recording, and the recording of physical attributes which could be used for identification purposes (such as DNA samples, retinal images, palm prints or fingerprints, etc.).
- 1.3.5. **Data processing.** execution of any technical tasks relating to data management, irrespective of the means and methods used, as well as of the place of use.
- 1.3.6. **Data transmission.** providing a specific third party with access to the personal data
- 1.3.7. **Disclosure.** providing anybody with access to the personal data.
- 1.3.8. **Data erasure.** the process of making the personal data irreversibly unrecognizable.
- 1.3.9. **Data marking.** labeling the personal data with an identification mark for the purpose of distinguishment.
- 1.3.10. **Data blocking.** labelling the data with an identification mark for the purpose of a permanent or a specific temporary restriction of their management.
- 1.3.11. **Destruction of data.** the irreversible destruction of the data storage storing the personal data.
- 1.3.12. **Restriction of data management.** the process of marking the personal data stored, with the aim of a future restriction.
- 1.3.13. **Data Controller.** a natural or legal person, or an entity without legal personality that, alone or jointly with others, determines the purposes and means of managing personal data, makes and executes the decisions regarding data management and the means of data management, or has these decisions executed, or has personal data processed by a contracted Data Processor.
- 1.3.14. **Data Processor.** a natural or legal person, or an entity without legal personality that manages personal data on behalf of the Data Controller.

- 1.3.15. **Third party.** a natural or legal person, or an entity without legal personality other than the Data Subject, Data Controller, Data Processor or the persons who, under the direct authority of the Data Controller or Data Processor, are authorized to manage the personal data
- 1.3.16. **Consent of the Data Subject.** any freely given, specific, informed and unambiguous indication of the wishes of Data Subject by which he or she, either by a statement or by a clear affirmative action, signifies agreement to having the personal data relating to him or her fully or partially processed.
- 1.3.17. **Objection.** a statement by Data Subject, by means of which Data Subject objects to the management of his or her personal data, and requests the termination of the management or the erasure of the data managed.
- 1.3.18. **Supervising authority.** an independent public authority established by a member state, in accordance with Article 51 of the GDPR. In Hungary, this entity is the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – see contact information under point 13.3)

2. RULES OF DATA MANAGEMENT

- 2.1. Contractor shall manage personal data lawfully, fairly, confidentially and in a transparent manner towards the Data Subject, respecting the fundamental principles of lawfulness, fairness and transparency. Contractor shall not misuse the data entrusted to him or her.
- 2.2. Personal data are collected for specified, explicit and lawful purposes and shall not be managed further by Contractor in a way that is incompatible with such purposes. Contractor shall manage solely the data, and solely for the time period that is indispensable, necessary and adequate to the effecting of the purpose of data management.
- 2.3. The data management undertaken by Contractor shall, in its every phase, comply with the purpose, rules and lawfulness of data management.
- 2.4. In case of any doubt regarding the consent of the Data Subject, Contractor shall presume the consent is not given.

3. SECURITY OF DATA MANAGEMENT

- 3.1. The computer systems and further place of data retention of the Contractor can be found at its principal place of business located at the address indicated under point 1.2.3., as well as with the Data Processor mentioned under point 6.
- 3.2. Contractor selects and operates the IT instruments used for the management of personal data in a way that the managed data are accessible exclusively to the parties authorized, thus guaranteeing the assurance of its authenticity and authentication, and the verification of it being unchanged. The personal data managed shall be protected from unauthorized access.
- 3.3. Contractor shall take all the necessary security, organizational and technical measures to ensure the highest protection of personal data against unauthorized activities (access, use, alteration, transmission, disclosure, erasure or destruction), as well as against accidental destruction, damage and inaccessibility resulting from technical errors; and in order to maintain the data authentic, accurate, confidential, complete, unchanged and up to date. Personal data may be accessible only and exclusively to those authorized, only to the necessary extent and by the necessary means and only in view of a specific purpose.
- 3.4. In relation to the data managed in the systems of external providers, subcontractors and transfer operators listed under point 6., the Privacy Statement of the external provider or subcontractor shall prevail.

4. LEGAL BASIS OF DATA MANAGEMENT

- 4.1. Legal basis of data management:
 - a.) Consent of the Data Subject;
 - b.) Act No. CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information;
 - c.) Act No. CVIII of 2001 on certain aspects of electronic commerce and information society services.

5. PURPOSE OF DATA PROCESSING

- 5.1. Ensuring business contact established between Contractor and Data Subject, as well as the contracts, transportation of goods and the provision of services (hereinafter collectively referred to as: transactions), in compliance with the Terms and Conditions. The legal basis of this data collection and data processing is the execution of transactions (orders and services) between Contractor and Data Subject.
- 5.2. Data processing serving Data Subject's raise of objections – cancellation, material and product liability claims, warranty claims, where Contractor is obliged by provisions of law and regulations to apply good administration.
- 5.3. Data management that serves the purpose of invoicing, transportation and accounting, the procedures of which are provided for by separate legislations.
- 5.4. Data processing serving the right of the Contractor as a service provider, for the purpose of managing and recovering of outstanding amounts.
- 5.5. Data processing with marketing purposes (e.g. sending newsletters, sending offers) by the Contractor, for which – after proper information – Contractor has, in any event, requested a prior, unambiguous and freely given written consent from Data Subject, and is in possession of this consent form and can put it at Data Subject's disposal upon a relevant request by Data Subject.

The validity of data processing and storage of data with marketing purposes shall be terminated within 8 working hours after Data Subject presents a relevant request or a revocation of authorization, but it shall not affect further cases of data processing (referred to under points 5.1–5.4)

6. DATA PROCESSORS AND DATA CONTROLLERS

- 6.1. Personal data are managed by the Contractor/Data Controller indicated under point 1.2.; more specifically Data Processors are employees of Contractor that participate in the execution of transactions on behalf of the Contractor.
- 6.2. In case of a raise of objections indicated under point 5.2., the relevant data are to be transmitted to the parties involved in the procedure – to an appropriate extent and on adequate grounds – in the course of the execution of the transactions.

- 6.3. Employee(s), as well as subcontractors employed by the Company that undertake the tasks of invoicing, transportation and accounting; and, in case of necessity, postal employees or employees of a courier company carrying out transportation procedures.
- 6.4. Employees managing the outstanding amounts determined under point 5.4., employee(s), as well as subcontractors employed by the Company.
- 6.5. Employee(s), any subcontractors of the Company in charge of marketing solicitations.
- 6.6. Data are not transmitted to so-called third countries outside the EU.
- 6.7. Contractor shall transmit the data in its possession to authorities exclusively for the purpose of complying with legal provisions – upon request, after the indication of the exact purpose and scope of data, exclusively in the appropriate quantity and to the appropriate extent.
- 6.8. In relation to the data management by employee(s), as well as subcontractors indicated under points 6.2–6.5., point 3.4. shall prevail.

7. DATA RETENTION PERIOD

- 7.1. In compliance with its legal obligations (e.g. invoices stored during an adequate time period in compliance with accountancy act), Contractor shall retain the data until the fifth year following the last transaction.
- 7.2. In case Data Subject does not request the erasure of his or her data, Contractor, in compliance with the legislation, shall store these data for the purpose of subsequent identification, but shall not retrieve or transmit these data. The aim of the Contractor is to ease further purchases by avoiding the need for Data Subject to re-enter his or her data.
- 7.3. Point 7.1. may be overridden by a relevant request of Data Subject (points 11–12.)

8. DATA SUBJECTS CONCERNED BY DATA PROCESSING

- 8.1. **Data Subject.** Any client that orders or purchases any goods or services falling within the scope of activities of Contractor, client that enters into a contract of sale with Contractor, as well as a client that has Contractor carry out any activity by means of which Contractor offers any products, goods or services to Data Subject in return for financial compensation.

9. SCOPE OF DATA PROCESSED AND STORED AND THE PURPOSE OF DATA STORAGE

- 9.1. Scope of data processed and stored and the purpose of data storage:
- a.) First name, last name and/or company name;
 - b.) Postal address and/or address of the headquarters and/or address of the principal place of business and/or invoicing address and/or delivery address;
 - c.) Telephone number and/or e-mail address;
 - d.) Bank account number;
 - e.) Tax identification number;
 - f.) Net and gross total amount of the transaction, the VAT value.
- 9.2. The purpose of processing and storing the data referred to under point 9.1. is the smooth execution of the transactions referred to under point 5.

10. DATA SUBJECT'S RIGHTS OF ACCESS

- 10.1. Data Subject can have access to his or her personal data.
- 10.2. Data Subject has the right to data portability.
- 10.3. Data Subject's right to request feedback on the management on his or her data extends exclusively to the personal data relevant to Data Subject and any pseudonymized data that can be unambiguously linked to Data Subject, but it does not include potential anonymous data. Data Subject cannot ask about the data not relevant to him or her.
- 10.4. In case Data Subject requests so, Contractor shall – complying with his or her obligations – give feedback on how the personal data of Data Subject is managed, and in case Contractor does manage them, Contractor shall also give feedback on the data managed, on the source of these data, on the purpose of data management, on its legal basis, on the period of management, on the name and address of the potential Data Processor, on the activities relating to data management, as well as the legal basis and the recipients of data transmission – in case personal data of Data Subject is being transmitted. Upon a request by Data Subject, Contractor shall send a written answer to the address indicated by Data Subject within a maximum of 30 days.

11. DATA SUBJECT'S RIGHT TO DATA RECTIFICATION

- 11.1. Data Subject has the right to rectify his or her personal data, or to have these data rectified at any given moment, however, this right does not extend to any anonymous data, nor to the personal data not relevant to Data Subject. Data Subject's right to rectification extends exclusively to the personal data relevant to Data Subject and any pseudonymized data that can unambiguously be linked to Data Subject.
- 11.2. Data Subject can request – through the contact information indicated under point 1.2. – the rectification of his or her personal data in a written form. Upon this request by Data Subject, Contractor shall adequately rectify or complete Data Subject's personal data. Contractor shall inform Data Subject and further Data Controllers (see point 6.) about the modification.
- 11.3. Contractor shall perform the rectification requested within 30 days. In case Contractor does not or cannot grant the request, Contractor must send a written explanation to Data Subject within 30 days.

12. DATA SUBJECT'S RIGHT TO DATA RESTRICTION AND ERASURE

- 12.1. Data Subject has the right, at any given moment, to restrict or erase his or her personal data, but this right does not extend to the any anonymous data, nor to data that are not relevant to Data Subject. Data Subject's right to restriction and erasure extends exclusively to the personal data relevant to Data Subject and any pseudonymized data that can be unambiguously linked to Data Subject.
- 12.2. Data subject may – through one of the contact details provided under point 1.2. – request the restriction or erasure of his or her personal data in a written form. In case of a relevant request by Data Subject, Contractor shall adequately restrict or erase personal data of Data Subject. Contractor shall inform Data Subject and further Data Controllers (see point 6.) about the modification.
- 12.3. Contractor shall execute the requested data restriction or erasure within 30 days. In case Contractor does not or cannot grant the request, Contractor shall send a written explanation to Data Subject within 30 days.
- 12.4. Contractor shall block Data Subject's personal data upon the relevant request of Data Subject, or in case, on the basis of the data in its possession, the erasure would presumably harm the interests of Data Subject. Data blocking may only last until the purpose or reason of data management that impedes the erasure persists.

- 12.5. Data Subject may, at any given moment, object to the management of his or her personal data, in case Contractor transmits the data to a third party or uses it for the purpose of direct marketing, conducting surveys or scientific research.
- 12.6. Data Subject has the right to revoke his or her consent relating to data management at any given moment, but this right does not affect the lawfulness of the data management already executed before the revocation and in compliance with the consent.
- 12.7. Contractor erases personal data, in case
- a.) managing the data is unlawful; or
 - b.) Data Subject presents a relevant written request; or
 - c.) the data managed are incomplete or incorrect, and the prevailing status cannot be remedied legally, furthermore law does not preclude the erasure; or
 - d.) the purpose of data management ceased to exist, or the legal deadline of data storage has expired; or
 - e.) upon order of the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság).
- 12.8. Data Subject has the right to have his or her personal data forthwith erased from the data processing and storing system of Contractor at any given moment, provided the combination of points a.) – c.) prevails,
- a.) these data are managed by Contractor; and
 - b.) Data Subject requests the erasure of these personal data; and
 - c.) these personal data are not necessary for the purposes for which Contractor is managing these personal data.
- 12.9. Data Subject has the right to have his or her personal data forthwith erased from the data processing and storing system of Contractor at any given moment, provided combination of points a.)–d.) prevails,
- a.) these data are managed by Contractor; and
 - b.) Data Subject requests the erasure of these personal data; and

c.) Data Subject revokes his or her consent on which the management of these personal data is based; and

d.) Contractor does not have any other legal basis for further management of the data of Data Subject.

- 12.10. Unless otherwise provided by law, Contractor may manage the data registered with the consent of Data Subject even after the revocation of an additional, separate consent and that of the consent of Data Subject, for the purpose of fulfilling the legal obligations relevant to Contractor, as well as for the purpose of enforcing the lawful interest of Contractor or a third party – provided that the enforcement of this interest is proportionate to the restriction of the right relevant to the protection of personal data.

13. HANDLING COMPLAINTS

13.1. In case of the violation of his or her rights regarding data management and data processing or regarding his or her personal data, Data Subject may turn to Contractor in a written form through one of the contact details provided under point 1.2., and Contractor shall send a confirmation on the receipt of the complaint within 8 working hours and is obliged to investigate the complaint within 30 days following its receipt. Contractor shall inform Data Subject on the results of the investigations and on the measures taken in a written form, through the contact information provided by Data Subject.

13.2. In case the written request of the Data Subject is considered justified by the Contractor, Data Subject may apply to a court.

13.3. Data Subject may lodge an appeal or complaint to the following authority:

Name:	Nemzeti Adatvédelmi és Információszabadság Hatóság
Address:	1125 Budapest, Szilágyi Erzsébet fasor 22/C
Postal address:	1530 Budapest, Pf.: 5.
Telephone number:	+36-1/391-1400
Fax number:	+36-1/391-1410
E-mail address:	ugyfelszolgalat@naih.hu
Website:	http://www.naih.hu

- 13.4. In case of the violation of the rights concerning content offensive to minors, hate speech, discriminatory content, rectification, rights of a deceased person and defamation, reports and complaints may be submitted to the following authority:

Name: **Nemzeti Média- és Hírközlési Hatóság**

Address: **1015 Budapest, Ostrom utca 23–25.**

Postal address: **1525 Budapest, Pf.: 75.**

Telephone number: **+36-1/457-7100**

Fax number: **+36-1/356-5520**

E-mail address: **info@nmhh.hu**

Website: **<http://www.nmhh.hu>**