

## **Privacy Policy**

This Privacy Policy contains information regarding the processing of personal data on the cheppers.com site of Cheppers Zrt. (1137 Budapest, Szent István körút 22.).

Our contact details:

*Address:* Szent István körút 22, 1137 Budapest, Hungary

*Email address:* info@cheppers.com

*Phone number:* +3630 5877859

This Privacy Policy is valid in every country wherever the website of Cheppers is accessible; the Privacy Policy is the General Data Protection Regulation (EU) No. 2016/679 (hereinafter referred to as Regulation).

### **1. Scope, legal ground, purpose and duration of processing**

#### **1.1. Processing of data of interested visitors**

##### **Description of data processing cases**

On the website, you can submit questions to us or contact us. If you submit an enquiry, we shall process the data, name, email address provided in or with the enquiry.

Provision and processing of data is indispensable for processing the enquiries.

##### **Legal ground and purpose of processing**

The legal ground for data processing is, pursuant to Article 6(1)(a) of the Regulation, Your voluntary consent.

##### **Duration of the processing**

After You have contacted us, we shall delete Your data, except if a business relationship is established and it implies further data processing.

### **2. Data Forwarding**

We shall not forward data to other persons.

### **3. Data processing of cookies**

With a view to the customised and efficient use of our website, and the fullest possible user experience, our website puts a small data package, a so-called cookie, on Your computer. Cookies are identifiers which our website or the server of the cookie-collecting partner sends to computers used by You to identify the computer used during the stay on our website and to store data about the use of the website (e.g. click-throughs other navigation data).

Most browsers are set to automatically accept such cookies. You can turn off the storing of cookies, and You can also set your browser to inform You before a cookie is put on Your computer. Such settings apply to the browser and computer used only, You must enable and disable the cookie settings for each computer and browser separately. If You disable cookies, we cannot guarantee that all website functions will work properly and fully.

#### **4. Your rights regarding the processing**

During the duration of processing, You have the following rights, pursuant to the provisions of the Regulation:

- access to personal data and processing information,
- right to rectification,
- right to restriction of processing,
- right to erasure,
- right to portability,
- right to withdraw consent.

If You wish to exercise Your right, it implies Your identification, and it is necessary that we communicate with You. Therefore, identification shall require that You disclose Your personal data (identification may, however, be based on data that we otherwise process in relation to You), and Your complaint regarding data processing will be available in our email account during the period specified herein for complaints.

We shall reply to complaints regarding data processing within 30 days at the latest.

#### **The right to withdraw the consent**

You are always entitled to withdraw Your consent to the processing; in such a case, we will erase data provided by You from our systems.

#### **Access to personal data and information**

You are entitled to get a response regarding the fact whether Your personal data are being processed; if there is processing, then You are entitled to:

- access the personal data processed and
- that we inform You of the following:
  - purposes of the processing;
  - categories of Your personal data processed;
  - information regarding the recipients or recipient categories to whom we have communicated or will communicate personal data;
  - planned duration of storing personal data, or, if this is not possible, the criteria for determining such a period;

- Your right that You may request the rectification, erasure, restriction of processing of personal data pertaining to You, and, in case of processing based on a legitimate interest, You may object the processing of personal data;
- the right to lodge a complaint with a supervisory authority;
- if data have not been collected from You, then all available information on their source;
- the existence of automated decision-making (if such a procedure is applied), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for You.

The purpose of exercising these rights may be to establish and control the lawfulness of the processing; therefore, if information is requested multiple times, we may charge their reasonable costs for providing such information.

We provide access to personal data by sending You the processed personal data and information via email after identifying You.

In your request, please indicate whether you would like to access personal data or request processing information.

### **Right to rectification**

You have the right that we, at Your request, rectify Your personal data without any delay.

### **Right to restriction of processing**

You have the right that we restrict processing at Your request if any of the following applies:

- You are disputing the accuracy of the personal data; in such a case, the restriction shall apply to the period during which we can check the accuracy of the personal data; if such a check is not necessary, then we shall not apply any restriction either;
- processing is unlawful, and You are against the erasure of data; instead, You are requesting the restriction of their use;
- we do not require the personal data anymore for the processing specified; however, You require them for the establishment, exercise or defence Your legal claims, or
- You have objected to processing but our legitimate interest may provide grounds for the processing, in this case, processing must be restricted until it is verified whether our legitimate grounds override those of You.

Where processing has been restricted, such personal data shall, except for storage, only be processed with Your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We shall inform You in advance if the restriction of processing is lifted (at least 3 working days prior to the lifting of the restriction).

### **Right to erasure, be forgotten**

You shall have the right to obtain from us the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;
- You withdraw Your consent on which the processing and there is no other legal ground for the processing;
- You object processing based on legitimate interest and there are no overriding legitimate grounds (i.e. legitimate interest) for the processing;
- we have processed the personal data unlawfully, and this has been established based on a complaint;
- the personal data must be erased for compliance with a legal obligation in Union or Member State law to which we are subject.

Where we have made Your personal data public for any lawful reason, and we are obliged pursuant to any of the reasons given above to erase such personal data, then we, taking account of the available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the data that You have requested the erasure by such controllers of any links to, or copy or replication of, those personal data. As a general rule, we shall not disclose Your personal data.

Erasure shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject (such a case is processing in invoicing, because the law requires that invoices are kept) or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for the establishment, exercise or defence of legal claims. (e.g. if we have a claim against You and You still have not fulfilled it, or a consumer, data processing complaint is in process).

### **Right to portability**

If processing is required for performing a contract or is based on Your voluntary consent, then You have the right to request that You get data You gave to us in a computer-readable format, and we shall provide You with such data in xml, JSON or csv format; if technically feasible, You may request that we forward such data in this format to other controllers.

### **Legal remedies**

If, in Your opinion, we have violated any statutory regulation on data processing or have failed to perform a request, then, in order to terminate the presumed unlawful processing, You may initiate the inspection procedure of the National Authority for Data Protection and Freedom of Information (mailing address: 1530 Budapest, Pf.: 5., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Please be also informed that You may file a civil lawsuit at a court.

## 5. **Data security**

During the operation of IT systems, the necessary access management, internal organisation and technical solutions ensure that your data do not get into the possession of unauthorised persons; unauthorised persons cannot delete, export or alter data in the system. We enforce data protection and data security requirements against our data processors as well.

We keep records of every potential data protection incident; we shall inform You of any incidents, if necessary and if the Regulation specifies it as obligatory.

## 6. **Miscellaneous Provisions**

We reserve the right to modify this Privacy Policy in a manner not affecting the purpose and legal grounds of the processing.

If we wished to process collected data for purposes different from the purpose of collection, then, still before any additional data processing, we shall inform You of the purpose of processing and the following:

- duration of storing personal data, or, if this is not possible, criteria for determining this period;
- Your rights that You may request access for You to Your personal data, rectification, erasure or restriction of the processing thereof, and, in case of processing based on legitimate interest, You may object the processing of personal data, and, in case of processing based on consent or a contract relationship, You may request that the right to data portability is ensured for You;
- in case of processing based on consent, the fact that You may at any time withdraw Your consent,
- Your right to submit a complaint to the supervisory authority;
- the fact whether providing personal data is based on the law or contractual obligation or is a prerequisite to concluding a contract, and whether You are obliged to disclose Your personal data, and what potential consequences non-disclosure of data might imply;
- the existence of automated decision-making (if such a procedure is applied), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for You.

Data processing may only start thereafter; if the legal ground for processing is a consent, then You also must consent to the processing in addition to the information.

This Privacy Policy is valid from 25 May 2018.