

AQUA LORENZO KFT.

**PRIVACY AND DATA PROTECTION POLICY**

FOR CONTACT THROUGH THE WEBSITE

**Name of the Data Controller:** Aqua Lorenzo Kft. (Hereinafter: Data Controller, Company)

**Headquarters of the Data Controller:** 2730 Albertirsa, Homokréz II.

**Company registration number of the Data Controller:** 13-09-205850

**Electronic address of the Data Controller:** info@aqualorenzo.hu

**Representative of the Data Controller:** Csaba Kassai, managing director

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**Principles followed by the Data Controller in its data management:**

- The Data Controller handles personal data in a way that is legal, fair and transparent to the Data Subject.
- Personal data is collected only for specified, explicit and legitimate purposes and is not processed in a way incompatible with these purposes.
- The personal data collected and processed by the Data Controller is appropriate and relevant to the purposes of data processing and is limited to the necessary data.
- The Data Controller shall take all reasonable measures to ensure that the data it processes is accurate and, if necessary, up-to-date, and shall delete or correct inaccurate personal data without delay.
- The Data Controller shall store the personal data in such a way that the Data Subject can be identified only for the time necessary to achieve the purposes of processing the personal data.
- It shall also ensure the adequate security of personal data against unauthorized or unlawful processing, accidental loss, destruction or damage to personal data by means of appropriate technical and organizational measures.

The Data Controller shall process data of the Data Subject on the basis of the Data Subject's voluntary consent, based on the prior information provided by the Data Controller, and only to the extent necessary and, in each case, for the relevant purposes only.

In some cases, the processing of the Data Subject's data is based on legal regulations and is mandatory, in which case the Data Controller shall draw the Data Subject's attention to this fact.

**Legislation applicable to data processing**

- Regulation (EU) 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 repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter 'GDPR') is applied to present the Data Controller's data processing practices to the Data Subjects.
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information. (hereinafter: Information Act)
- Act V of 2003 on the Civil Code (hereinafter: Civil Code)

**Definitions**

The definitions of this Privacy and Data Protection Policy are the same as the definitions contained in Article 4 of the GDPR. In addition to the provisions set forth in Section 3 of the Information Act.

Wherever this Privacy and Data Protection Policy refers to data or data processing, it shall be understood to mean personal data or the processing of personal data.

### **Data management for contact purposes**

The Company maintains contact with interested parties, partners and customers primarily by electronic means and by telephone,

Anyone can contact the Data Controller directly through the contact interface on the Data Controller's website.

In this case, the purposes of data management are the following: response to inquiries from interested parties, communication.

The Data Controller processes the data provided by the Data Subject only for the purposes of communication and administration. The Data Controller shall initiate contact with any Data Subject only through the contact details provided by the Data Subject, with the consent of the Data Subject as a legal basis, in accordance with the data protection rules.

### **The need to provide personal information**

Providing personal data is a condition for contacting the Data Subject through the website, for communication between the Data Subject and the Data Controller, and for replying to messages.

### **Scope of personal data processed**

1. Name
2. Email address
3. Phone number

### **Legal basis for data management**

The legal basis for the processing of personal data is the consent of the Data Subject. The consent is given via the Company's website in the event of contact through the Company's website. The source of personal data is the Data Subject.

### **Recipients of personal data provided by the Data Subject**

The personal data provided will be processed by the Data Controller's employees who have the right to make suggestions or decisions in connection with communication, answering messages or administration related to the Data Subject.

### **Data processors**

1. **Do Média Korlátolt Felelősségű Társaság** (registered office: 2500 Esztergom, Kossuth Lajos utca 54. 4.) is the hosting provider of the Data Controller's email system.
2. **WhiteDog Média Korlátolt Felelősségű Társaság** (registered office: 1062 Budapest, Andrásy út 105.) is the operator of the Data Controller's website.

### **Information for consent-based data processing**

If the data processing is based on consent, the Data Subject has the right to withdraw their consent at any time without any obligation to state reasons. Withdrawal of consent shall not affect the lawfulness of the data processing prior to withdrawal. The Data Subject shall be informed of this before consent is given. Withdrawal of consent shall be as simple as providing it. The Data Controller is obliged to delete the personal data concerning the Data Subject without undue delay if the Data Subject withdraws the consent which is the legal basis of the data processing and there is no other legal basis for the Data Controller.

The Controller may process the personal data of the Data Subject only for the purposes specified by the Data Controller and contractually agreed upon, in accordance with the Data Controller's instructions. The Data Controller shall have no discretionary power in relation to the processing. The Data Controller is bound by a duty of confidentiality in relation to the retention of personal data obtained in the course of its duties.

### **Duration of the processing of personal data**

The Data Controller shall process personal data obtained during communication until the communication is terminated, after which it shall ensure the complete erasure of the personal data obtained.

### **Automated decision making and profiling**

Automated decision making and profiling does not occur during data processing.

### **Transfer of personal data to a third country or international organization**

The Data Controller does not transfer personal data to third countries or international organizations.

### **Rights of the Data Subject in relation to the data processed by the Data Controller**

#### **Right to information**

The Data Controller shall take appropriate measures to provide the Data Subject with information on the processing of personal data and other information in a concise, transparent, comprehensible and easily accessible form, in a clear and coherent manner, which the Data Controller shall provide by making this Privacy and Data Protection Policy available.

#### **Right of access to data**

The Data Subject has the right to receive feedback from the Data Controller upon request as to whether the processing of their personal data is in progress, and if such data processing is in progress, they have the right to access the personal data and the following related data management information.

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be communicated, including in particular third country recipients or international organizations;
- d) the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period;
- e) the Data Subject is informed of the right to request the Data Controller to rectify, delete or restrict the processing of personal data concerning them and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority;

- g) where the data from the Data Subject have not been collected by the Data Controller, any available information about their source.

### **Right to rectify personal data**

The Data Subject has the right to correct inaccurate or incomplete personal data. The Data Subject may request the Data Controller to correct any of their personal data (e.g. their name, email address, telephone number if there is a change) through the contact details of the Data Controller.

Taking into account the purpose of the processing, the Data Subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

In order for the Data Controller to be able to decide whether the new data is real and to amend the previous data on this basis, the Data Subject must prove the reality of the data requested to be corrected and must also prove that the person entitled to the data correction requests the amendment of the data.

### **Right to delete personal data**

The Data Subject shall have the right to have their personal data deleted by the Data Controller upon their request without undue delay where one of the following grounds applies:

- a) the Data Controller no longer needs the personal data for the purpose for which they were collected or otherwise processed;
- b) in the case of consent-based data processing, the Data Subject withdraws their consent and there is no other legal basis for the data processing;
- c) the Data Subject objects to the data processing and there is no legitimate reason taking priority for the data processing, or the Data Subject objects to the data processing for the purpose of direct business acquisition;
- d) personal data is processed unlawfully by the Data Controller;
- e) personal data must be deleted in order to fulfil a legal obligation to which the Data Controller is subject under applicable European Union or Member State law;
- f) personal data have been collected in connection with the provision of information society services.

### **Right to restrict data processing**

The Data Subject has the right to restrict the data processing of the Data Controller, upon his or her request, if one of the following conditions is met:

- a) the Data Subject disputes the accuracy of the personal data, in which case the restriction shall apply to the period of time that allows the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject objects to the deletion of the data and requests instead that their use be restricted;
- c) the Data Controller no longer needs the personal data for the purpose of data processing, but the Data Subject requests the data in order to submit, enforce or defend legal claims; or
- d) the Data Subject objects to the data processing; in this case, the restriction shall apply for the period until it is determined whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the Data Subject.

### **Right to data portability**

The Data Subject shall receive the personal data relating to them which they have provided to the Data Controller in a structured, widely used, machine-readable format and shall have the right to have those data transmitted by the Data Controller to another Data Controller if

- a) the processing is based on consent or a contract built upon Article 6 (1) (b) of the GDPR; and
- b) the processing is carried out in an automated manner.

### **Procedures for the exercise of the rights of the Data Subject**

The Data Subject may exercise the rights set out above by sending an email to [info@aqualorenzo.hu](mailto:info@aqualorenzo.hu) or by sending a letter to the Data Controller's head office or by visiting the Data Controller's head office in person.

The Data Controller shall start the examination and execution of the Data Subject's request without undue delay. The Data Controller shall inform the Data Subject of the measures taken on the basis of the request within 30 days after receiving the request. The Data Controller may extend the deadline by 30 days, informing the Data Subject within 30 days after receiving the request.

In the event that the Data Controller is unable to comply with the request, it shall inform the Data Subject of the reasons for the refusal and the legal remedies within 30 days.

The information shall be provided free of charge by the Data Controller, unless

1. The Data Subject requests the information/measure repeatedly, with essentially unchanged content
2. the application is clearly unfounded,
3. the request is excessive

In cases specified in this section, the Data Controller is entitled to:

1. reject the request
2. make the execution of the request subject to the payment of a reasonable fee.

If the Data Subject request the transfer of data on paper or on an electronic data carrier, a copy of the relevant data shall be provided free of charge by the Data Controller in the requested manner, unless the chosen platform presents a technically disproportionate difficulty.

### **Right of appeal in relation to data processing**

We ask that you contact our Company before submitting your complaint to the supervisory authority or the court in order to consult and resolve the problem as quickly as possible.

If a Data Subject wishes to make a complaint about data processing, they can do so at the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH) at the following contact details:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf. 9.

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

If, in the opinion of the Data Subject, the Data Controller or the data processor entrusted by or acting on behalf of the Data Controller processes their personal data in breach of the law, they may take legal

action against the Data Controller. The court shall rule on the matter out of turn. The lawsuit may also be initiated before the court of the Data Subject's domicile or residence of the Data Subject or the registered office of the Data Controller.

Albertirsa, October 15, 2021

Aqua Lorenzo Kft.

Representative: Csaba Kassai, Managing Director