

# Privacy Policy

## DATA PROCESSING INFORMATION

CSEMPEBOLT.EU DATA PROCESSING INFORMATION

Ingatlan-Innováció Ltd.

Data Processing Information

Introduction

Ingatlan-Innováció Ltd. (1054 Budapest, Honvéd utca 8. 1/2., tax number: 24971609241) (hereinafter: Service Provider, Data Controller) adheres to the following regulation:

The protection of natural persons in relation to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL (April 27, 2016) as per the following information.

This privacy policy regulates the data processing of the following pages/mobile applications: <https://csempebolt.eu>,

The privacy policy is available from the following page: [https://www.csempebolt.eu/shop\\_help.php?tab=privacy\\_policy](https://www.csempebolt.eu/shop_help.php?tab=privacy_policy)

Amendments to the policy come into effect upon publication at the above address.

Data Controller and Contact Information

Name: Ingatlan-Innováció Ltd.

Headquarters: 1054 Budapest, Honvéd utca 8. 1/2.

Email: [info@csempebolt.eu](mailto:info@csempebolt.eu)

Phone: +3617654653

Definitions

"personal data": 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, number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; "data processing": any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction; "data controller": the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing personal data; where the purposes and means of such processing are determined by Union or Member State law, the data controller or the specific criteria for its nomination may be provided for by Union or Member State law; "data processor": a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller; "recipient": 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; "consent of the data subject": a 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; "data protection incident": a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. Principles relating to processing of personal data

Personal data shall be:

processed lawfully, fairly and in a transparent manner in relation to the data subject ("lawfulness, fairness and transparency"); collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ("purpose limitation"); adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimisation"); accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy"); 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ("storage limitation"); processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("integrity and confidentiality"). The controller shall be responsible for, and be able to demonstrate compliance with, the principles set out in this paragraph ("accountability").

The data controller declares that its data processing complies with the principles outlined in this section.

Webshop Operation / Service Usage Data Processing

[Continuation of the document is not included in the translation request]

Data Processing Related to Webshop Operation/Service Usage

The fact of data collection, the scope of the processed data, and the purpose of data processing with the individual's consent: Personal Data

Purpose of Data Processing

Legal Basis

Username

Identification, enabling registration

Article 6(1)(b) of the GDPR and Section 13/A(3) of the Elker Act.

Password

Ensures secure access to the user account.

First and last name

For contact, purchasing, issuing proper invoices, and exercising the right of withdrawal.

Email address

Communication.

Phone number

Communication, more efficient coordination regarding billing or delivery.

Billing name and address

Issuing proper invoices, as well as establishing, determining the content, modifying, monitoring the fulfillment of the contract, billing of the arising fees, and enforcing related claims.

Article 6(1)(c) of the GDPR, and Section 169(2) of Act C of 2000 on Accounting

Shipping name and address

Enabling home delivery.

Article 6(1)(b) of the GDPR and Section 13/A(3) of the Elker Act.

Date of purchase/registration

Executing a technical operation.

IP address at the time of purchase/registration

Executing a technical operation.

Scope of data subjects: All individuals registered/purchasing on the webshop website. Neither the username nor the email address needs to contain personal data. Duration of data processing, deadline for deleting data: Until the data subject's request for deletion, if any of the conditions set out in Article 17(1) of the GDPR are met. The data controller shall inform the data subject electronically of any deletion of personal data based on Article 19 of the GDPR. If the data subject's request for deletion also covers the email address provided, the data controller shall also delete the email address following the notification. Except for accounting documents, which must be kept for 8 years according to Section 169(2) of Act C of 2000 on Accounting. Contractual data of the data subject can be deleted after the expiry of the civil statute of limitations based on the data subject's request for deletion. Accounting documents directly and indirectly supporting accounting settlements (including ledger accounts, analytical, and detailed records) must be preserved in a readable form, traceable based on accounting records, for at least 8 years.

Possible data controllers entitled to know the data, recipients of personal data: Personal data may be processed by the data controller and its authorized employees, respecting the above principles. Description of data subjects' rights related to data processing: The data subject may request access to personal data concerning him or her, their correction, deletion, or restriction of processing, and the right to data portability, and to withdraw consent at any time. The data subject can initiate access to personal data, their deletion, modification, or restriction of processing, portability of data, or objection in the following ways: by post at 1054 Budapest, Honvéd utca 8. 1/2., via email at [info@csempebolt.eu](mailto:info@csempebolt.eu), by phone at +3617654653. Legal basis for data processing: Article 6(1)(b) and (c) of the GDPR, Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (Elker Act): The service provider may process those personal data that are technically indispensable for the provision of the service. The service provider shall select and operate the tools used in the provision of information society services in such a way that personal data are processed only if it is absolutely necessary for the provision of the service and the fulfillment of other purposes defined in this Act, but even in this case, only to the necessary extent and duration.

In the case of issuing accounting documents compliant with accounting laws, Article 6(1)(c). In case of enforcing claims arising from the contract, Section 6:22 of Act V of 2013 on the Civil Code, which provides for a 5-year limitation period. Section 6:22 [Limitation]

(1) Unless this Act provides otherwise, claims are time-barred after five years.

(2) The limitation period begins when the claim becomes due.

(3) An agreement to modify the limitation period must be in writing.

(4) An agreement excluding limitation is void.

Please note that data processing is necessary for the performance of the contract and for making offers. you are obliged to provide personal data in order to fulfill your order. the failure to provide data means that we cannot process your order.

Cookie Management

The use of cookies known as "session cookies for password-protected sessions", "cookies necessary for the shopping cart", "security cookies", "Essential cookies", "Functional cookies", and "cookies responsible for managing website statistics" does not require prior consent from the individuals concerned. Fact of data processing, scope of data handled: Unique identifier number, dates, times Scope of data subjects: All individuals visiting the website. Purpose of data processing: Identification of users and tracking of visitors. Duration of data processing, deadline for deleting data: Type of Cookie

Legal Basis for Data Processing

Duration of

Data Processing

Session cookies

Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (Elkertv.)

For the duration of the relevant visitor session

Permanent or saved cookies

Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (Elkertv.)

Until deletion by the data subject

Statistical, marketing cookies

Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (Elkertv.)

1 month - 2 years

Possible data controllers entitled to know the data: The data controller does not process personal data with the use of cookies. Description of data subjects' rights related to data processing: The data subject has the option to delete cookies in the Tools/Settings menu of browsers, usually under the Privacy settings. Legal basis for data processing: Consent from the data subject is not required if the sole purpose of using cookies is to transmit a communication over an electronic communications network or if it is strictly necessary for the service provider to provide a service explicitly requested by the subscriber or user in the context of information society services. Most browsers used by our users allow settings to determine which cookies should be saved and enable the deletion of (specified) cookies again. If you restrict the saving of cookies on certain websites or do not allow third-party cookies, this can lead to certain circumstances where our website may no longer be fully usable. Here you can find information on how to customize cookie settings in common browsers: Google Chrome (<https://support.google.com/chrome/answer/95647?hl=hu>)

Internet Explorer (<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>)

Firefox (<https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>)

Safari (<https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>)

#### Use of Google Ads Conversion Tracking

The data controller uses the "Google Ads" online advertising program and utilizes Google's conversion tracking service within its framework. Google conversion tracking is an analytical service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). When a User accesses a website via a Google advertisement, a cookie necessary for conversion tracking is placed on their computer. These cookies have limited validity and do not contain personal data, so the User is not identifiable through them. When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller can see that the User clicked on the ad. Each Google Ads client receives a different cookie, so they cannot be tracked through the websites of Ads clients. The information obtained with the help of conversion tracking cookies is used to create conversion statistics for Ads clients who have opted for conversion tracking. Clients are informed about the number of users who clicked on their advertisement and were redirected to a page tagged with a conversion tracking label. However, they do not receive information that personally identifies users. If you do not wish to participate in conversion tracking, you can reject this by disabling the installation of cookies in your browser. You will then not be included in the conversion tracking statistics. For more information and Google's privacy policy, please visit: <https://policies.google.com/privacy>.

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help analyze how users use the site. The information generated by the cookies about your use of the website (including your IP address) will generally be transmitted to and stored by Google on servers in the United States. If IP anonymization is activated on this website, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en>.

#### Newsletter, Direct Marketing Activity

According to Section 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities, the User may give prior and explicit consent to the Service Provider to contact them on the contact details provided at registration with its advertising offers and other mailings. Furthermore, the Customer may consent to the Service Provider processing their personal data necessary for sending advertising offers. The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from the offers without restriction or justification, free of charge. In this case, the Service Provider will delete all personal data necessary for sending the advertising messages from its records and will not contact the User with further advertising offers. Users can unsubscribe from the advertisements by clicking on the link in the message. The fact of data collection, the range of data managed, and the purpose of data processing: Personal Data.

Purpose of Data Processing Legal Basis Name, email address. Identification, enabling subscription to the newsletter/discount coupons. The individual's consent, Article 6(1)(a) of the GDPR. Section 6 (5) of Act XLVIII of 2008. Date of subscription Technical operation. Subscription IP address Technical operation. Scope of stakeholders: All individuals subscribing to the newsletter. Purpose of data processing: Sending electronic messages containing advertisements (email, SMS, push message) to the individual, providing information about current news, products, promotions, new features, etc. Duration of data processing, deadline for deleting data: Data processing lasts until the withdrawal of the consent statement, i.e., until unsubscription. Possible data processors entitled to access the data, recipients of personal data: Personal data can be processed by the data controller, as well as its sales and marketing staff, respecting the above principles. Rights of the data subjects regarding data processing: The individual may request access to personal data concerning them from the data controller, correction, deletion, or restriction of processing, and may object to the processing of their personal data and has the right to data portability, as well as to withdraw consent at any time. The individual can initiate access to their personal data, their deletion, modification, or restriction of processing, portability of data, or their objection in the following ways: By mail at 1054 Budapest, Honvéd utca 8. 1/2., By email at [info@csempebolt.eu](mailto:info@csempebolt.eu), By phone at +3617654653. Please note that data processing is based on your consent and the legitimate interest of the service provider. you are obliged to provide personal data if you want to receive our newsletter. failure to provide data means that we cannot send you a newsletter. we inform you that you can withdraw your consent at any time by clicking on the unsubscribe link. withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### Complaint Handling

The fact of data collection, the range of data managed, and the purpose of data processing: Personal Data.

Purpose of Data Processing Legal Basis First and last name Identification, communication. Article 6(1)(c) of the GDPR, and Section 17/A (7) of Act CLV of 1997 on Consumer Protection. Email address Communication. Phone number Communication. Billing name and address Identification, handling of quality complaints, questions, and issues related to ordered products/services. Scope of stakeholders: All individuals shopping on the website and making quality complaints or complaints. Duration of data processing, deadline for deleting data: According to Section 17/A (7) of Act CLV of 1997 on Consumer Protection, the minutes of the complaint, its transcript, and the response to it must be kept for 3 years. Possible data processors entitled to access the data, recipients of personal data: Personal data can be processed by the data controller and its authorized staff, respecting the above principles. Rights of the data subjects regarding data processing: The individual may request access to personal data concerning them from the data controller, correction, deletion, or restriction of processing, and has the right to data portability, as well as to withdraw consent at any time. The individual can initiate access to their personal data, their deletion, modification, or restriction of processing, portability of data in the following ways: By mail at 1054 Budapest, Honvéd utca 8. 1/2., By email at [info@csempebolt.eu](mailto:info@csempebolt.eu), By phone at +3617654653. Please note that providing personal data is a legal obligation. the processing of personal data is a prerequisite for concluding a contract. you are obliged to provide personal data to handle your complaint. failure to provide data means that we cannot handle your complaint.