

Privacy Policy - Vitality's-Hair

1. General guidelines

- We collect and process personal data only in accordance with applicable laws.
- We only transfer personal data to third parties with consent.
- Under no circumstances do we sell the personal data we process to third parties.
- We store data as securely as possible.
- We only send newsletters to individuals who have given their prior and explicit consent.
- Data subjects may request access to, correction or deletion of their stored data at any time.

2. Details and contact information of our company (Data Controller, Service Provider)

Name of the Data Controller:

Contact details of the Data Controller:

Phone:

Email:

Website:

Tax number:

The Service Provider reserves the right to amend this Privacy Policy and will inform data subjects of any changes in an appropriate manner. Information relating to data processing is published on the **LINK GOES HERE** website.

3. Definitions according to the GDPR (Regulation)

3.1. **data subject/User:** any identified or identifiable natural person who can be identified, directly or indirectly, on the basis of personal data;

3.2. **personal data:** any information relating to the data subject – in particular the name, identification mark, and one or more pieces of information relating to their physical, physiological, mental, economic, cultural or social identity – as well as any conclusion that can be drawn from such information concerning the data subject;

3.3. **consent:** a voluntary and specific indication of the data subject's wishes, based on appropriate information, by which they give their unambiguous consent to the processing of personal data concerning them, either in full or for specific processing operations;

3.4. **Data Controller:** the natural or legal person or organisation without legal personality which, alone or jointly with others, determines the purposes of the processing of data, makes and implements decisions concerning data processing (including the means used), or has them implemented through the Data Processor;

3.5. **data processing:** any operation or set of operations performed on data, regardless of the procedure used, including in particular the collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, coordination or combination, blocking, deletion and destruction of data, as well as preventing further use of the data, taking photographs, audio or video recordings, and recording physical characteristics suitable for identifying a person (e.g. fingerprints, palm prints, DNA samples or iris images);

3.6. **data transfer:** making data accessible to a specific third party;

3.7. **disclosure:** making data accessible to anyone;

3.8. **data deletion:** making data unrecognisable in such a way that it can no longer be restored;

3.9. **data processing:** carrying out technical tasks related to data processing operations, regardless of the method or means used to perform the operations or the place where they are carried out, provided that the technical task is performed on the data;

3.10. **Data Processor:** the natural or legal person or organisation without legal personality which processes data on the basis of a contract, including a contract concluded pursuant to a legal provision;

3.11. **personal data breach:** unlawful processing of personal data, including in particular unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction or damage.

4. Scope of processed data, purpose and duration of processing, and Data Processors

Type of data processed	Purpose of data processing	Duration of data processing	Legal basis for data processing	Data Processor of the personal data concerned
Username	Identification, registration.	Until consent is withdrawn	Consent of the data subject.	
Password	Secure login to the user account.	Until consent is withdrawn	Consent of the data subject.	
Name	Communication and handling of any questions that may arise.	Until consent is withdrawn	Consent of the data subject.	
Email address	Communication and handling of any questions that may arise.	Until consent is withdrawn	Consent of the data subject.	
Phone number	Communication and handling of any questions that may arise.	Until consent is withdrawn	Consent of the data subject.	

Billing name and address	Issuing a compliant invoice, concluding and subsequently performing the contract.	We process the data for 5 years in accordance with the civil law limitation period.	Under Section 159(1) of Act CXXVII of 2007 on Value Added Tax, issuing an invoice is mandatory, and this is also required under Section 169(2) of Act C of 2000 on Accounting.
Delivery name and address	Enabling home delivery.	Until delivery of the ordered goods.	Performance of the contract. [Processing pursuant to Article 6(1)(b) of the Regulation]
Date and time of purchase/registration	Proof of consent.	Until the expiry of the limitation period following termination of data processing	This obligation is prescribed by Article 7(1) of the Regulation. [Processing pursuant to Article 6(1)(c) of the Regulation]
IP address at the time of purchase/registration	Proof of consent.	Until the expiry of the limitation period following termination of data processing	This obligation is prescribed by Article 7(1) of the Regulation. [Processing pursuant to Article 6(1)(c) of the Regulation]

Data subjects concerned: All data subjects registered on or purchasing through the webshop website.

Personal data is shared exclusively with the third parties listed in the "Data Processor of the personal data concerned" column, for the purpose of fulfilling the obligations set out in the contract.

Details and tasks of the Data Processors used during data processing

Hosting provider

Name: InfoNetfort Kft.

Address: 7900 Szigetvár, Szent István ltp 17. IV/25.

Phone: +36-30/530-2953

Email: kapcsolat@netfort.hu

Website: www.netfort.hu

Tax number: 26648082-2-02

Company registration number: 02 09 084205

Accounting services

Courier service

Direct marketing, newsletter

Name:

Address:

4.1 Contact form:

Type of data processed	Purpose of data processing	Duration of data processing	Legal basis for data processing
Name	Contacting us	For 90 days after the data subject's last contact	Consent of the data subject when making contact
Email address	Contacting us	For 90 days after the data subject's last contact	Consent of the data subject when making contact
Phone number	Contacting us	For 90 days after the data subject's last contact	Consent of the data subject when making contact
Other personal data provided by the data subject when making contact		For 90 days after the data subject's last contact	Consent of the data subject when making contact

Data subjects concerned: Persons who contact us by phone, email or via the contact form.

Personal data is not shared with third parties.

5. Newsletter and direct marketing activities

We only send newsletters to Users who have given their prior and explicit consent. Consent is provided through the "Subscribe to newsletter" form.

Type of data processed	Purpose of data processing	Duration of data processing	Legal basis for data processing
Name	Sending newsletters	Until withdrawal (unsubscription).	Consent of the data subject
Email address	Sending newsletters	Until withdrawal (unsubscription).	Consent of the data subject
Date of consent and IP address of the data subject.	Verifiability of consent	Until withdrawal (unsubscription).	This obligation is prescribed by Article 7(1) of the Regulation.

Data subjects concerned: All data subjects subscribed to the newsletter.

The operator of the newsletter system and Data Processor:

Name:

Address:

5.1 Procedure for withdrawing consent (unsubscribe)

The data subject may unsubscribe from the newsletter at any time and free of charge. Unsubscription can be carried out using the link provided in the newsletters or by sending an email to **EMAIL ADDRESS GOES HERE**.

6. Use of cookies

6.1 What is a cookie?

The Data Controller uses so-called cookies when visiting the website. A cookie is a package of information consisting of letters and numbers that our website sends to the data subject's browser in order to save certain settings, facilitate the use of our website and help us collect some relevant statistical information about our visitors. Cookies do not contain personal information and cannot be used to identify individual users. Cookies often contain a unique identifier – a secret, randomly generated sequence of numbers – which is stored on the data subject's device. Some cookies expire when the website is closed, while others are stored on your computer for a longer period.

6.2 Legal basis and grounds for the use of cookies

Cookies typically used by webshops include "cookies used for password-protected sessions", "cookies required for the shopping cart" and "security cookies", for which prior consent from data subjects is not required.

Data processing: Unique identification number, dates and times

Data subjects concerned: All data subjects visiting the website.

Purpose of data processing: Identification of users and tracking of visitors.

Legal basis for data processing: Consent of the data subject in accordance with Section 5(1)(a) of the Info Act.

6.3 Duration of data processing and deadline for data deletion: the website uses the following cookies:

- Security cookies: __cfduid, _biz_flagsA, _biz_nA3, _biz_pendingA, _biz_sid, _biz_uid
- Google Analytics cookies: _ga, _gid
- Cookies required for the proper functioning of the website:

Persons authorised to access the data that may potentially be processed: The Data Controller does not process personal data through the use of cookies.

Description of data subjects' rights concerning data processing: Data subjects may delete cookies in the Tools/Settings menu of their browsers, generally under the Privacy settings.

If a data subject does not accept the use of cookies, certain functions may not be available to them. Further information about deleting cookies can be found at the following links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: https://support.apple.com/kb/ph21411?locale=en_US

7. Google Analytics

7.1. This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are stored on your computer and enable analysis of how the website is used by the User.

7.2. The information generated by the cookies relating to the website used by the User is generally transferred to and stored on a Google server in the USA. By activating IP anonymisation on the website, Google will truncate the User's IP address beforehand within the member states of the European Union or in other states party to the Agreement on the European Economic Area.

7.3. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and truncated there. On behalf of the operator of this website, Google will use this information to evaluate how the User has used the website, to compile reports on website activity for the website operator and to provide other services relating to website and internet use.

7.4. Within Google Analytics, the IP address transmitted by the User's browser is not combined with other data held by Google. The User may prevent cookies from being stored by configuring their browser accordingly; however, please note that in this case not all functions of this website may be fully available. The User may also prevent Google from collecting and processing data relating to their website use generated by cookies (including their IP address) by downloading and installing the browser plugin available at the following link:
<https://tools.google.com/dlpage/gaoptout?hl=hu>

8. Google AdWords conversion tracking and remarketing

8.1. The Data Controller uses the online advertising programme called "Google AdWords" and, within this framework, uses Google's conversion tracking service. Google conversion tracking is an analytics service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

8.2. When a User accesses a website through a Google advertisement, a cookie required for conversion tracking is placed on their computer. These cookies have a limited validity period and do not contain any personal data, so they cannot be used to identify the User.

8.3. 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 advertisement.

8.4. Each Google AdWords customer receives a different cookie, so users cannot be tracked through the websites of AdWords customers.

8.5. The information obtained through conversion tracking cookies is used to create conversion statistics for customers who have opted for AdWords conversion tracking. This allows customers to determine the number of users who clicked on their advertisement and were redirected to a page equipped with a conversion tracking tag. However, they do not receive information that could be used to identify any individual user.

8.6. If you do not wish to participate in conversion tracking, you can opt out by disabling the installation of cookies in your browser. You will then not be included in conversion tracking statistics.

8.7. Further information and Google's privacy policy are available at:
www.google.de/policies/privacy/

8.8. Google AdWords Remarketing

8.9. Data processing as part of remarketing is carried out using cookies.

Processed data

Data processed by the cookies specified in the cookie policy.

Duration of data processing

The data storage period of the relevant cookie. Further information is available here:

Google general cookie information: <https://www.google.com/policies/technologies/types/>

Google Analytics information:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>

Legal basis for data processing

The voluntary consent of the data subject, provided to the Service Provider through the use of the

website.

9. Rights of data subjects

9.1 Right to information

At the request of the data subject, the Service Provider, as Data Controller, shall provide information about the data processed by it or by a Data Processor commissioned by it, the source of the data, the purpose, legal basis and duration of processing, the name and address of the Data Processor and its activities related to data processing, the circumstances and effects of any personal data breach and the measures taken to remedy it, as well as, in the case of data transfers, the legal basis and recipient of the transfer. The Data Controller shall provide the information in writing, in an understandable form, at the shortest possible time after the request is submitted, but no later than 30 days, at the request of the data subject. This information is provided free of charge if the person requesting the information has not submitted a request concerning the same category of data to the Data Controller during the current year. In other cases, the Service Provider may charge a fee.

9.2 Right to rectification

The Service Provider shall rectify personal data if it is inaccurate and the correct personal data is available to it.

9.3 Right to restriction of processing

The Service Provider shall restrict the processing of personal data if the data subject requests it or if, based on the information available, it can be assumed that deletion would violate the legitimate interests of the data subject. Restricted personal data may only be processed for as long as the purpose of processing that prevented the deletion of the personal data continues to exist. The Service Provider shall mark personal data if the data subject disputes its correctness or accuracy, but the incorrectness or inaccuracy of the disputed personal data cannot be clearly established.

9.4 Right to erasure

The Service Provider shall delete personal data if its processing is unlawful, if the data subject requests it, if the processed data is incomplete or incorrect and this condition cannot be lawfully remedied, provided that deletion is not excluded by law, if the purpose of processing has ceased to exist, if the statutory retention period has expired, or if ordered by a court or the Hungarian National Authority for Data Protection and Freedom of Information.

9.5 Procedural rules

The Data Controller has 30 days to delete, restrict or rectify personal data. If the Data Controller does not comply with the data subject's request for rectification, restriction or deletion, it shall communicate the reasons for refusal in writing or, with the consent of the data subject, electronically within 30 days. The Service Provider shall notify the data subject, as well as all persons to whom the data was previously transferred for processing purposes, of the rectification, restriction, marking or deletion. Notification may be omitted if, in view of the purpose of processing, this does not harm the legitimate interests of the data subject.

9.6 Right to object

The data subject may object to the processing of their personal data if

- a) the processing or transfer of personal data is necessary solely for the fulfilment of a legal obligation imposed on the Data Controller or for the enforcement of the legitimate interests of the Data Controller, the recipient of the data or a third party, unless the processing is required by law;
- b) in other cases specified by law.

The Service Provider shall examine the objection within the shortest possible time after the request is submitted, but no later than 15 days, decide whether it is justified and inform the

applicant of its decision in writing. If the Data Controller determines that the objection is justified, it shall terminate the processing, including further data collection and transfer, restrict the data, and notify all persons to whom the personal data concerned by the objection was previously transferred of the objection and the measures taken on the basis thereof. Such persons are obliged to take the necessary measures to ensure the exercise of the right to object.

If the data subject does not agree with the decision made by the Data Controller, they may bring the matter before a court within 30 days of receiving the decision.

The Service Provider may not delete the data of the data subject if the processing of the data is required by law. However, the data may not be transferred to the recipient if the Data Controller has agreed to the objection or if the court has established that the objection was justified.

9.7 Right to data portability

If data processing is carried out by automated means, or if the processing is based on the voluntary consent of the data subject, the data subject has the right to request that the Data Controller provide the data supplied by the data subject to the Data Controller. The Data Controller shall provide the data in XML, JSON or CSV format where technically feasible. The data subject may also request that the Data Controller transmit the data in this format to another Data Controller.

9.8 Compensation and damages for non-material harm

The Service Provider shall compensate for damage caused to another person by unlawful processing of the data subject's data or by violating data security requirements. In the event of infringement of the data subject's personality rights, the data subject may claim damages for non-material harm pursuant to Section 2:52 of the Civil Code. The Data Controller is also liable towards the data subject for damage caused by the Data Processor. The Data Controller is exempt from liability if the damage was caused by an unavoidable cause outside the scope of data processing.

The Data Controller shall not compensate for damage and no damages for non-material harm may be claimed to the extent that the damage or infringement of personality rights was caused by the intentional or grossly negligent conduct of the injured party or data subject.

9.9 Right to bring court proceedings

In the event of infringement of their rights, the data subject may bring proceedings against the Data Controller before a court. The court shall hear the case as a matter of priority.

9.10 Complaint

Complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Hungarian National Authority for Data Protection and Freedom of Information

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Phone: +361/391-1400

Fax: +361/391-1410

Email: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

10. Data security

The Service Provider designs and carries out data processing operations in such a way as to ensure the protection of the privacy of data subjects.

The Service Provider, and the Data Processor within the scope of its activities, shall ensure the security of the data, take the technical and organisational measures and establish the procedural rules necessary to enforce the provisions of the Info Act and other data and confidentiality protection rules.

The Service Provider shall protect data during processing, in particular against unauthorised access, alteration, transmission, disclosure, deletion or destruction, accidental destruction or damage, and loss of accessibility resulting from changes in the technology used.

During data processing, the Service Provider maintains:

- confidentiality: protecting information so that only those authorised to access it can do so
- integrity: protecting the accuracy and completeness of the information and the processing method
- availability: ensuring that authorised users can access the required information when they need it and that the necessary related resources are available.

The IT systems and networks of the Service Provider and its partners involved in data processing are protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flooding, as well as computer viruses, computer intrusions and denial-of-service attacks. The Operator ensures security through server-level and application-level protection procedures.

11. Applicable legislation used in preparing this Privacy Policy

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Info Act)
- Act V of 2013 on the Civil Code (Civil Code)
- Act CLV of 1997 on Consumer Protection (Consumer Protection Act)
- Act XIX of 1998 on Criminal Proceedings (Criminal Procedure Act)
- Act CVIII of 2001 on certain issues relating to electronic commerce services and information society services (E-Commerce Act)
- Act C of 2003 on Electronic Communications (Electronic Communications Act)
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities (Advertising Act)
- Recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements for prior information
- GDPR, Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing and protection of personal data of natural persons and on the free movement of such data

DATE