

Privacy Statement

Definitions

According to 2011. CXII., §3.

1. *concerned: any natural person identified, or identified from personal data directly or indirectly;*
2. *personal data: data relating to the data subject, in particular the name, identifying mark, and the knowledge of one or more physical, physiological, mental, economic, cultural or social identities of the data subject, and the deduction from the data to the data subject;*
3. *special data: racial origin, nationality, political opinion or party affiliation, religious or other belief in the world, membership of an interest representation organization, sexual life, health status, abnormal passion and criminal personal data.*
4. *Personal data on criminal matters: personal data relating to a criminal offense or criminal proceedings relating to criminal proceedings or the detection of criminal offenses in connection with or in connection with criminal proceedings and criminal proceedings;*
5. *Public interest data: regardless of the manner in which it is handled and treated by a body or person in charge of the activity or public service of a public or local public authority, including its scope of competence, competence, organizational structure, professional activity, its effectiveness, the data types held and the rules governing operation, as well as the data on the management and the contracts concluded;*
6. *Public interest public data: any data not covered by the notion of public interest information, for the disclosure, disclosure or disclosure of which is governed by law in the public interest;*
7. *Contribution: a voluntary and decisive statement of the will of the person concerned, based on appropriate information and with which he or she gives his / her unambiguous consent to the handling of his / her personal data, covering all or part of operations;*
8. *protest: the statement of the person concerned with which he or she objected to the handling of his / her personal data and requests the termination of data processing and the cancellation of the data processed;*
9. *data controller: means a natural or legal person or an organization without legal personality who, either independently or with others, determines the purpose of the processing of data, makes decisions on data management (including the equipment used) and executes it or executes it with the data processor entrusted to it;*
10. *data management: irrespective of the method used, any operation or all of the operations, such as collecting, capturing, recording, systematizing, storing, modifying, using, retrieving, transmitting, disclosing, aligning, linking, blocking, deleting and destroying data, to prevent further use, to take photographs, sound or images, and to record physical features (such as finger or palm print, DNA pattern, iris image) for identifying the person;*
11. *data forwarding: making the data available to a specific third party;*
12. *disclosure: making data accessible to anyone;*
13. *data deletion: making the data unrecognizable in such a way that their restoration is no longer possible;*
14. *data indication: the identification of the data is to distinguish it;*

15. *data locking: to limit the further handling of the data by means of an identification mark for a definite or fixed time period;*
16. *data destruction: physical destruction of data-containing media;*
17. *data processing: performing technical tasks related to data management operations, irrespective of the method and device used to perform the operations and the location of the application, provided that the technical task is carried out on the data;*
18. *data processor: is a natural or legal person or an organization without legal personality who, on the basis of a contract concluded with the data controller, including the conclusion of a contract under the provisions of the law, performs processing of data;*
19. *data responsible: the body performing the public task which has generated the public interest information which is obliged to be published electronically or whose operation has resulted in such data;*
20. *informants: the body performing the public task which, if the data controller does not publish the data itself, publishes the data provided to him by the data controller on his website;*
21. *file: the totality of data processed in one register;*
22. *third party: means any natural or legal person or entity with no legal personality, which is not the same as the data subject, the data controller or the data processor;*
23. *EEA-State: a Member State of the European Union and a State party to the Agreement on the European Economic Area, as well as a State which is a national of a Contracting Party to the Agreement on the European Economic Area, on the basis of an international treaty between the European Union and its Member States, and a non-Contracting Party to the Agreement on the European Economic Area, a national of a Member State;*
24. *third country: any State which is not an EEA State;*
25. *user: the natural person who registers on the website of Penta-Elektrik Kft. (user account or newsletter);*
26. *URL: Uniform Resource Locator, unified resource identifier, a web address.*
27. *privacy incident: Unauthorized treatment or processing of personal data, in particular unauthorized access, alteration, transmission, disclosure, deletion or destruction, and unintentional destruction or damage.*

Data Management Principles

Personal data should only be obtained fairly and legally. Personal data can be handled if:

- the person concerned agrees, or,
- it is governed by the law, or - by the authority of the law, within the scope specified therein - local government decree.

A declaration by a legal representative of a minor or disabled person is required, with the exception of those parts of services where the statement is intended to be commonly registered in everyday life and does not require any particular consideration.

The person concerned has the right to withdraw his approval at any time. Withdrawing his approval does not affect the prior data management's lawfulness which was on basis of the contribution the withdrawal of the consent must be allowed in the same simple way as the granting of the consent.

Only personal data that is essential for achieving the purpose of data management can only be used to reach the goal only to the extent and time necessary to attain it.

Personal data may only be stored for specific and legitimate purposes and may not be used otherwise.

Personal data can only be handled for a specific purpose, in order to exercise the right and to fulfill obligations. At all stages of the data handling, it must meet this goal.

Personal data can only be handled with appropriate informed consent.

The data subject must be informed, clearly, in a clear and detailed manner, of all the facts related to his or her data, in particular the purpose and legal basis of the data processing, the data controller and the person entitled to process it, the duration of the data handling, and who can know the data. The information should also include the rights and remedies available to the data subject in question.

Personal data processed must meet the following requirements:

- their inclusion and handling are fair and legitimate;
- accurate, complete and, if necessary, timely;
- their storage is capable of identifying the person concerned only for the time needed for storage.

It is forbidden to use a general and uniform personal identification mark without restriction.

Personal data must be proportionate to the purpose of their storage and must comply with this objective and may not extend beyond that.

The personal data storage method must be such as to allow the identification of the user concerned for the time necessary for the purpose of storage.

Appropriate security measures should be taken to protect personal data stored in automated data files to prevent accidental or unlawful destruction or accidental loss or unauthorized access, alteration, or dissemination.

Personal data can be transmitted, and different data manipulations can be linked when the party concerned has consented to it or if the law allows it and if the terms of the data are met for each personal data.

Personal data (including special data) may be transmitted to a data controller or data processor in a third country, irrespective of the medium or the means of transmission, in the third country where the party concerned expressly consented or permitted by law and the data transmitted in the third country handling and processing of personal data is ensured. Data transmission to EEA States shall be deemed to be the transfer of data within the territory of Hungary.

Details of the data controller

Name: PENTA-ELEKTRIK Kft.

Address: 6500 Baja, Dózsa György út 40.

Registration number: 03-09-108620

Name of the court of registration: Kecskeméti Törvényszék Cégbírósága

Tax number: 12553835-2-03

Phone: +36 79 325 676

Email: info@penta-elektrik.hu

Legal Basis, Purpose, and Method of Data Management

1. Data management is available to users of Internet content at www.penta-elektrik.hu between the parties, the Buyer has the right to purchase, based on a voluntary, well-informed statement

contained in the contract of carriage, which includes users' the express consent of the buyers to use the site and / the personal data communicated during the performance of the sales contract are used. The legal basis for data management is the CXII 2011 Law on Information Self-Destruction and Freedom of Information. Article 5 (1) (a), the voluntary contribution of the person concerned.

2. The purpose of the data management is to purchase and sell the goods between the parties. to ensure delivery of a delivery contract solely for the purpose of order fulfillment and performance obligation (billing). The Data Handler only handles personal data that is essential for the purpose of data management and is suitable for reaching the goal. Personal data is only managed to the extent and for the duration required to achieve this goal.

The personal data to be provided for using these services is as follows:

Data for invoicing customers:

- Company name; office; shipping address / billing address, availability (phone, e-mail), company data (tax number, etc.)
 - For a private individual: name, birth name, mother's name, place of birth, time, address, contact details (phone, e-mail)
3. The data controller may not use the personal data provided for purposes other than those set out in these points. Issuance of personal data to a third party or authorities - unless otherwise mandatory by law - is only possible with the express prior consent of the user.
 4. The Data Manager does not control the personal information you provide. The correctness of the data given is solely the responsibility of the person giving it. When you provide any e-mail address to any user, you are responsible for solely receiving the service from the specified e-mail address. With respect to this responsibility, any liability associated with an entry in a given e-mail address will only be borne by the user who registered the e-mail address.

The circle of people concerned:

- visitors to the website of the data manager (visiting the IP address of the site), the site of PENTA-ELEKTRIK Ltd. can usually be visited by anyone free of charge and without any personal information about himself. Parts of the site may be visited without registration and the services available there are free of charge.
- In addition to the above, the sales service provided by the data controller for the activities of his / a supply contract is created. At the time of the conclusion of the contract, information as required by the personal data necessary to complete the contract is required.

The 2011 Act CXII on the Data Controller, the Right to Information Self-Destruction and the Freedom of Information. (Infotv.) in compliance with the provisions of this Act. The data controller only keeps records for which the data subject has previously been expressly authorized by the data subject and to the extent that this is strictly necessary to provide the service he wishes to use.

The data controller is responsible for visiting your website, registration or registration. conclusion of a sale, purchase contract, it does not under any circumstances make it available to a third party without the express prior consent of the party concerned, unless it is legally binding.

Rights of people concerned:

Anyone at any time can request information about handling your personal data, or request that it be corrected or deleted.

Right to access

At the request of the data subject concerned, the data controller shall provide information on the data he or she handles, the purpose, legal basis, duration of the data processing, the data processor's name, address (s) and data management activity, the circumstances, effects and measures taken to remedy the data incident; in the case of the transmission of his / her personal data, the legal basis and the addressees of the transfer. The data controller shall provide the information in writing and in a legible form within the shortest possible time from the submission of the request, but not later than within 25 days. This information is free of charge if the requesting information has not yet been filed with the data controller for the same area in the current year. In other cases, the data controller may set a cost reimbursement. The data controller deletes personal data if it is unlawful, the data subject requests, the purpose of data management has expired or the statutory deadline for data storage has expired, ordered by the court or by the data protection commissioner. In the event of non-disclosure, the data controller shall inform the addressee in writing of the provisions of the law that refuse the disclosure. In the event of refusal of information, the controller shall inform the person concerned of the remedies available to the court and of the possibility of appeal to the Authority. The controller shall notify the Authority of any rejected applications by 31 January of the year following the reference year.

Right to rectify

The data subject shall have the right to rectify any inaccurate personal data that he or she is entitled to request, without undue delay. Considering the purpose of data management, the person concerned has the right to request the addition of incomplete personal data, including by means of a supplementary statement.

Right to rescind ("right to make forget")

The data subject shall have the right to delete personal data concerning him without undue delay, and the data controller shall be required to delete the personal data of the data subject without undue delay if one of the following reasons exists:

- a. personal data is no longer needed for the purpose from which they were collected or otherwise handled;
- b. the party concerned withdraws the consent of the data controller and does not have any other legal grounds for data handling;
- c. the data subject is objecting to data handling and has no prior legitimate reason for data handling or the data subject is objecting to data handling pursuant to Article 21 (2);
- d. the personal data was illegally handled;
- e. the personal data shall be deleted for the legal obligation of the data controller applicable to the law of the Union or of the Member States;
- f. the collection of personal data was made in connection with the offering of information society services.

Instead of being deleted, the data controller will lock the personal data if the data subject so requests or if, based on the information available to him, it is assumed that the deletion would harm the legitimate interests of the data subject. Personal data so locked can only be handled as long as there is a data management target that excludes the deletion of personal data.

The data controller shall indicate the personal data he or she manages if the person concerned disputes its correctness or accuracy but the incorrect or imprecise nature of the personal data in question is not clearly identified.

The data controller will inform the data subject of correction, blocking, marking, and deletion, as well as those who previously had the data transferred for data management, unless this proves impossible or

requires disproportionate effort. At the request of the data subject, the data controller shall inform the addressees thereof.

The right to restrict data management

The data subject is entitled to request that the data controller restricts the data handling upon request if one of the following is met:

- a. the person concerned disputes the accuracy of the personal data, in this case the restriction concerns the period of time for the data controller to check the accuracy of the personal data;
- b. data processing is illegal and the data subject is opposed to the deletion of the data and instead asks for their use restriction;
- c. the data controller no longer needs personal data for data processing purposes but the data subject requires them to submit, enforce, or protect legal claims; or
- d. the person concerned has objected to data handling; in this case, the restriction applies to the period in which it is established that the legitimate reasons for the data controller have priority over the legitimate grounds of the party concerned.

The right to data portability

The data subject shall have the right to receive personal data made available to him by a data controller in a fragmented, widely used machine-readable format and shall be entitled to transmit such data to another data controller without this being obstructed by the data controller the personal information was provided to you if:

- a. data processing is either a contribution or a contract; and
- b. data management is done automated.

Automated decision-making in individual cases, including profiling

The data subject shall be entitled to exclude the scope of any decision based solely on automated data processing, including profiling, which would have a bearing on him or would have a significant effect on him, unless the decision:

- a) it is necessary to conclude or complete the contract between the data subject concerned and the data controller;
- b) is made available to the data controller by Union or national law which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- c) based on the express consent of the person concerned.

Right to protest

The person concerned has the right to object to the handling of his or her personal data for reasons related to his / her own situation, including profiling based on those provisions. In this case, the data controller may not process the personal data unless the data controller proves that the data processing is justified by compelling reasons of lawfulness that prevail over the interests, rights and freedoms of the data subject, or for the purpose of submitting, enforcing or protecting legal claims linked.

If your personal data is handled for direct business, you have the right to object at any time to the handling of your personal data for that purpose, including profiling if it is related to direct business acquisition.

If the person objects to the handling of personal data for direct business acquisition, personal data may no longer be handled for that purpose.

The person concerned may object to the handling of his or her personal data if:

- the processing of personal data is only necessary for the enforcement of the right or legitimate interest of the data controller or the data exporter, unless data management is prescribed by law;
- the use or transmission of personal data is done for direct business acquisition, polling or scientific research;
- law makes it possible to exercise the right to protest.

The data controller shall, at the same time suspend the processing of data, examine the protest within the shortest possible time but not later than 15 days from the submission of the request and inform the applicant in writing thereof. If the protest is warranted, the data controller will discontinue data processing, including further data collection and data transfer, and lock the data, and notify any protest or action taken against those who have been previously transferred to the personal data affected by the protest and who are obliged to take action in order to enforce the right to protest.

If the data controller disagrees with the decision of the data controller – within 30 days of its notification- may appeal to the court.

The data controller cannot delete the data of the data subject if it has been ordered by law. However, the data cannot be transmitted to the data sender if the data controller agrees with the protest, and the court has found the right to protest.

In case of breach of his or her rights, the data subject may turn to the court.

An appeal can be lodged with the National Data Protection and Information Authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Head office: 1125 Budapest Szilágyi Erzsébet fasor 22/c.

Postal address: 1530 Budapest, Pf.: 5.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Web: <http://naih.hu>

Duration of data management

- During the visit of the web site, the data controller became aware of, the handling of personal data provided by the user during the registration will be maintained until the visitor's express request for deletion is disseminated. the user does not subscribe to the service with that user name.
- The sale or purchase. delivery contract or the handling of the personal data provided during the execution thereof will be maintained until the legal relationship between the parties exists.

The date of deletion is between the visitor, the user, 10 working days from the receipt of the buyer's cancellation request. In the event of the use of unauthorized, misleading personal data or in the event of an offense or system attack by a user, the data controller is entitled to delete his data at the same time as the user is registered and at the same time he or she suspects a criminal offense or suspicions of civil liability is entitled to retain personal data for the duration of the proceedings.

- User-provided personal data - even if the user does not disconnect from the service - can be handled by the data handler until the user specifically requests them in writing to terminate their

processing. A request to terminate a user's unauthorized access to a service does not affect his or her access to the service request, but he may not be able to access certain services in the absence of personal information. The personal data will be deleted within 10 working days of receiving this request.