Privacy Policy - EgoShop.hu

1. General principles

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

2. Details and contact information of our company (data controller, Service Provider)

Name of the data controller: BEST LINE Kft.
Contact details of the data controller: 8252 Balatonszepezd, Csokonai utca 9.
Telephone: +36301526122
E-mail: info@egoshop.hu
Web: https://www.egoshop.hu
Tax number: 12994414-2-19

The Service Provider reserves the right to amend this Privacy Policy, of which it will inform the data subjects appropriately. Information relating to data processing will be published on the **LINK GOES HERE** website.

3. Definitions according to the GDPR (Regulation)

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

3.2. **personal data:** any information relating to the data subject – in particular the data subject's name, identification mark, as well as one or more elements characteristic of their physical, physiological, mental, economic, cultural or social identity – and 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 and by which the data subject gives an unambiguous indication of agreement to the processing of personal data concerning them, either in full or for specific operations;

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

3.5. **processing of personal data**: any operation or set of operations performed on data, regardless of the procedure used, such as collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, restriction, erasure and destruction, 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, iris images);

3.6. **data transfer:** making data accessible to a specified 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 and means used to perform the operations and regardless of the place of application, provided that the technical task is performed on the data;

3.10. **data processor:** the natural or legal person, or organisation without legal personality, who or which processes data on the basis of a contract, including a contract concluded under the provisions of legislation;

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

4. Scope of processed data, purpose and duration of processing, and data processors

Type of data processed	Purpose of processing	Duration of processing	Legal basis for processing	Processor of the relevant personal data
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	Maintaining contact and handling any questions that may arise.	Until consent is withdrawn	Consent of the data subject.	
E-mail address	Maintaining contact and handling any questions that may arise.	Until consent is withdrawn	Consent of the data subject.	
Telephone number	Maintaining contact and handling any questions that may arise.	Until consent is withdrawn	Consent of the data subject.	

Billing name and address	Issuing a proper invoice and creating and subsequently fulfilling the contract.	We process the data for 5 years in accordance with the civil law limitation period.	Issuing an invoice is mandatory pursuant to Section 159(1) of Act CXXVII of 2007 on Value Added Tax, and pursuant to Section 169(2) of Act C of 2000 on Accounting.
Shipping 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 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]

Scope of data subjects: All data subjects registered on or purchasing from the webshop website.

Personal data are shared exclusively with the third party specified in the "Processor of the relevant personal data" column, for the purpose of fulfilling the obligations set out in the contract.

Details and tasks of the data processors engaged during data processing

Hosting provider
Name: InfoNetfort Kft.
Address: 7900 Szigetvár, Szent István ltp 17. IV/25.
Telephone: +36-30/530-2953
E-mail: kapcsolat@netfort.hu
Web: 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 processing	Duration of processing	Legal basis for processing
Name	Making contact	For 90 days after the data subject's last contact	Consent of the data subject when making contact
Email address	Making contact	For 90 days after the data subject's last contact	Consent of the data subject when making contact
Telephone number	Making contact	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

Scope of data subjects: Persons who contact us by telephone, e-mail or through the contact form.

Personal data are not shared with third parties.

5. Newsletter, direct marketing activities

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

Type of data processed	Purpose of processing	Duration of processing	Legal basis for processing
Name	Sending newsletters	Until withdrawal (unsubscribe).	Consent of the data subject
E-mail address	Sending newsletters	Until withdrawal (unsubscribe).	Consent of the data subject
Date of consent and the data subject's IP address.	Ability to verify consent	Until withdrawal (unsubscribe).	This obligation is prescribed by Article 7(1) of the Regulation.

Scope of data subjects: All data subjects who have subscribed to the newsletter.

Operator of the newsletter sending system and processor of the data:
Name:
Address:

5.1 Procedure for withdrawing consent (unsubscribing)
The data subject may unsubscribe from the newsletter at any time and free of charge. Unsubscribing may be done using the link included in the newsletters or by sending an e-mail to **EMAIL ADDRESS GOES HERE** .

6. Use of cookies

6.1 What is a cookie?

When visiting the website, the Data Controller uses so-called cookies. 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, make the use of our website easier and help us collect some relevant statistical information about our visitors. Cookies do not contain personal information and are not suitable for identifying 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 after the website is closed, while others are stored on your computer for a longer period.

6.2. Legal basis and legal background for the use of cookies

Cookies characteristic of online stores include so-called "cookies used for password-protected sessions", "cookies required for the shopping cart" and "security cookies", for the use of which prior consent from data subjects is not required.

Fact of processing and scope of data processed: Unique identification number, dates, times

Scope of data subjects: All data subjects visiting the website.

Purpose of processing: Identification of users, tracking of visitors.

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

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

- Security cookies: __cfduid, _biz_flagsA, _biz_nA 3, _biz_pendingA, _biz_sid, _biz_uid
- Google Analytics cookies: _ga, _gid
- Cookies required for the proper operation of the website:

Possible data controllers authorised to access the data: The data controller does not process personal data through the use of cookies.

Information on the data subjects' rights relating to data processing: The data subject may delete cookies in the Tools/Settings menu of browsers, generally under the Privacy settings.
If the 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, enabling analysis of how the website visited by the User is used.
7.2. The information generated by cookies relating to the website used by the User is generally transmitted to and stored on one of Google's servers in the USA. By activating IP anonymisation on the website, Google shortens the User's IP address beforehand within the Member States of the European Union or other states that are party to the Agreement on the European Economic Area.
7.3. The complete IP address is only transmitted to a Google server in the USA and shortened there in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the User used the website, to compile reports on website activity for the website operator, and to provide further services related to website and Internet use.
7.4. Google does not associate the IP address transmitted by the User's browser within the framework of Google Analytics with other data held by Google. The User may prevent the storage of cookies by appropriately configuring their browser; 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 the data relating to their use of the website generated by cookies (including the IP address) by downloading and installing the browser plug-in 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 analytical service of 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 necessary for conversion tracking is placed on the User's computer. These cookies have a limited validity period and do not contain any personal data, so the User cannot be identified through them.
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 these 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 choose AdWords conversion tracking. This allows customers to determine the number of Users who click on their advertisement and are redirected to a page equipped with a conversion tracking tag. However, they do not receive information that could identify any individual User.
8.6. If you do not wish to participate in conversion tracking, you may refuse it by disabling the option to install cookies in your browser. You will then not be included in conversion tracking statistics.
8.7. Further information and Google's privacy statement are available at: www.google.de/policies/privacy/

8.8. Google AdWords Remarketing

8.9. Processing in the form of remarketing is carried out using cookies.

Processed data
Data processed by the cookies specified in the cookie information.
Duration of 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 processing
The voluntary consent of the data subject, given 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 on the data processed by it or by a processor commissioned by it, the source of the data, the purpose, legal basis and duration of the processing, the name and address of the data processor and its data processing activities, the circumstances and effects of any personal data breach and the measures taken to remedy it, and, in the event of data transfer, its legal basis and recipient. 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 free of charge if the person requesting the information has not submitted a request for information concerning the same category of data to the data controller during the current year. In other cases, the Service Provider shall charge a fee for the costs incurred.

9.2 Right to rectification
The Service Provider shall rectify personal data if they are inaccurate and the correct personal data are available.

9.3 Right to restriction of processing
The Service Provider shall restrict the processing of personal data if the data subject requests this or if, based on the information available, it can be assumed that deletion would infringe the legitimate interests of the data subject. Restricted personal data may only be processed for as long as the purpose of processing that prevented deletion of the personal data remains in place. The Service Provider shall mark personal data under its control if the data subject disputes their correctness or accuracy, but the inaccuracy or incorrectness of the disputed personal data cannot be clearly established.

9.4 Right to erasure
The Service Provider shall erase personal data if their processing is unlawful, the data subject requests it, the processed data are incomplete or incorrect – and this situation cannot lawfully be remedied – provided that erasure is not excluded by law, the purpose of processing has ceased, the statutory storage period has expired, or a court or the Hungarian National Authority for Data Protection and Freedom of Information has ordered it.

9.5 Procedural rules
The data controller has 30 days to erase, restrict or rectify personal data. If the data controller does not fulfil the data subject's request for rectification, restriction or erasure, it shall provide the reasons for refusal in writing within 30 days or, with the data subject's consent, electronically. The Service Provider shall notify the data subject, as well as all persons to whom the data had previously been transferred for the purposes of processing, of the rectification, restriction, marking or erasure. Such notification may be omitted if, in view of the purpose of processing, it does not prejudice 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 compliance with a legal obligation imposed on the data controller or for the enforcement of the legitimate interest of the data controller, data recipient or a third party, except where 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 submission of the request, but no later than 15 days, decide on its merits, and notify the applicant in writing of its decision. If the data controller establishes that the data subject's objection is

justified, it shall terminate the processing – including further data collection and data transfer – and restrict the data, and shall notify all persons to whom the personal data concerned by the objection were previously transferred of the objection and the measures taken on its basis; such persons shall be required to take action to enforce the right to object.

If the data subject disagrees with the decision made by the data controller, they may bring the matter before a court within 30 days of the notification of the decision.

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

9.7 Right to data portability
Where processing is carried out by automated means or where processing is based on the data subject's
voluntary consent, the data subject has the right to request the Data Controller to provide the data
provided by the data subject to the Data Controller in XML, JSON or CSV format, if technically feasible,
and may request that the Data Controller transmit the data in this form to another data controller.

9.8 Compensation and non-pecuniary damages
The Service Provider shall compensate any damage caused to another person by unlawful processing of the data subject's data or by violation of data security requirements. In the event of infringement of the data subject's personality rights, the data subject may claim non-pecuniary damages (Section 2:52 of the Civil Code). The data controller is also liable to the data subject for damage caused by the data processor. The data controller shall be exempt from liability if the damage was caused by an unavoidable event outside the scope of data processing.

The data controller shall not compensate for damage and non-pecuniary damages may not be claimed to the extent that the damage or infringement of personality rights resulted from the intentional or grossly negligent conduct of the injured party or data subject.

9.9 Right to bring court proceedings
If the rights of the data subject are infringed, the data subject may bring an action against the data controller before a court. The court shall deal with the case as a matter of priority.

9.10 Complaint
A complaint may be lodged with 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.
Telephone: +361/391-1400
Fax: +361/391-1410
E-mail: 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, as well as the data processor within its area of activity, 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 Information Act and other data and confidentiality protection regulations.

The Service Provider shall protect the data by appropriate measures, in particular against unauthorised access, alteration, transmission, disclosure, deletion or destruction, accidental destruction and damage, as well as inaccessibility resulting from changes in the technology used.

During data processing, the Service Provider shall maintain:

- confidentiality: protecting information so that only authorised persons can access it
- integrity: protecting the accuracy and completeness of the information and the processing method
- availability: ensuring that when an authorised user needs the information, they can actually access it and that the relevant 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 flood, as well as computer viruses, computer intrusions and attacks resulting in denial of service. 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
- Act XIX of 1998 on Criminal Procedure
- Act CVIII of 2001 on certain issues relating to electronic commerce and information society services (E-Commerce Act)
- Act C of 2003 on Electronic Communications
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Economic Advertising Activities
- 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, protection and free movement of personal data of natural persons

DATE