

# **Privacy Policy**

**Acceptance Date: 25-09-2024**

## **Data Controller**

Name: Novimpex Holding S.R.L.

Headquarters: Oradea 410195, Stefan Simion 16, Romania

Complaints handling: [info@novimpex-holding.eu](mailto:info@novimpex-holding.eu)

Email: [info@novimpex-holding.eu](mailto:info@novimpex-holding.eu)

Website: [www.novimpex-holding.eu](http://www.novimpex-holding.eu)

## **Hosting Provider**

Name: Rackhost Zrt.

Mailing Address: 6722 Szeged, Tisza Lajos körút 41

Email Address: [info@rackhost.hu](mailto:info@rackhost.hu)

## **Description of Data Processing Carried Out During Website Operation**

This document contains all relevant information regarding data processing in connection with the operation of the webshop, based on the General Data Protection Regulation of the European Union (Regulation 2016/679, hereinafter: GDPR) and the Act CXII of 2011 (hereinafter: Info Act).

# Information Regarding the Use of Cookies

## What is a cookie?

The Data Controller uses so-called cookies during the visit to the website. A cookie is a package of information consisting of letters and numbers, which our website sends to your browser with the purpose of saving certain settings, making the use of our website easier, and helping us collect some relevant statistical information about our visitors.

Some cookies do not contain personal information and cannot be used to identify individual users, but others contain an individual identifier—a secret, randomly generated string of numbers—that is stored on your device, allowing for your identification. The duration of each cookie's operation is detailed in the respective cookie descriptions.

## Legal background and basis for using cookies:

There are three main types of cookies: essential cookies necessary for the proper operation of the Website, cookies for statistical purposes, and cookies for marketing purposes.

The legal basis for data processing for statistical and marketing cookies is your consent, as stated in Article 6(1)(a) of the GDPR, and for the essential cookies necessary for the operation of the Website, the legitimate interest according to Article 6(1)(f) of the GDPR.

## Main characteristics of the cookies used by the website:

### Essential cookies:

If you do not accept the use of these cookies, certain functions may not be available to you.

- **Session cookies:** These cookies store the visitor's location, browser language, and payment currency. Their lifespan lasts until the browser is closed or a maximum of 2 hours.
- **Age-restricted content cookies:** These cookies record the approval of age-restricted content and confirm that the user is over 18 years old. Their lifespan lasts until the browser is closed.
- **Recommended products cookies:** These cookies store the list of products to be recommended to a friend via the "recommend to a friend" feature. Their lifespan is 60 days.
- **Mobile version, design cookies:** These cookies detect the visitor's device and switch to full view on mobile. Their lifespan is 365 days.
- **Cookie acceptance cookie:** Upon arriving at the site, this cookie stores the acceptance of the cookie statement in the warning window. Its lifespan is 365 days.
- **Logout #2 cookie:** According to the #2 option, the system logs out the visitor after 90 days. Its lifespan is 90 days.
- **Backend identifier cookie:** This cookie is used to identify the backend server serving the site. Its lifespan lasts until the browser is closed.

## Cookies for Statistical Purposes:

- **Google Analytics cookie:** Google Analytics is Google's analytics tool that helps website and app owners gain a more accurate understanding of their visitors' activities. The service may use cookies to collect information and generate reports from statistical data regarding the use of the website without personally identifying visitors to Google. The primary cookie used by Google Analytics is the “\_\_ga” cookie. In addition to reports generated from website usage statistics, Google Analytics—along with some of the advertising cookies mentioned above—can also be used to display more relevant ads in Google products (such as Google Search) and across the web.
- **Referrer cookies:** These record the external site from which the visitor arrived at the website. Their lifespan lasts until the browser is closed.
- **Recently viewed product cookie:** This records the products the visitor last viewed. Its lifespan is 60 days.
- **Recently viewed category cookie:** This records the last category the visitor viewed. Its lifespan is 60 days.
- **Cart cookie:** This records the products placed in the cart. Its lifespan is 365 days.
- **Smart offer cookie:** This records the conditions for displaying smart offers (e.g., whether the visitor has previously been on the site, or whether they have an order). Its lifespan is 30 days.

For more information on deleting cookies, please refer to the links below:

Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>

Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Mozilla: <https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Chrome: <https://support.google.com/chrome/answer/95647>

Edge: <https://support.microsoft.com/hu-hu/help/4027947/microsoft-edge-delete-cookies>

# **Data Processed for the Purpose of Contract Conclusion and Fulfillment**

Various data processing activities may occur for the purpose of concluding and fulfilling a contract. Please note that data processing related to complaint handling and warranty management will only take place if you exercise one of these rights.

If you do not make a purchase through the webshop and only visit the webshop, the provisions regarding data processing for marketing purposes may apply to you, provided you give us your consent for marketing purposes.

## **Details of Data Processing for Contract Conclusion and Fulfillment:**

### **Issuing an invoice**

The data processing is carried out to issue an invoice in compliance with legal requirements and to fulfill the obligation to retain accounting documents.

According to Section 169 (1)-(2) of the Accounting Act, business entities must retain accounting documents that directly and indirectly support the accounting records.

### **Processed data**

Name, address, email address, phone number.

### **Duration of data processing**

Invoices must be retained for 8 years from the date of issuance, in accordance with Section 169 (2) of the Accounting Act.

### **Legal basis for data processing**

The issuance of an invoice is mandatory based on Section 159 (1) of Act CXXVII of 2007 on Value Added Tax, and the retention of the invoice for 8 years is required under Section 169 (2) of Act C of 2000 on Accounting [data processing in accordance with Article 6(1)(c) of the GDPR].

## **Additional Data Processing**

If the Data Controller intends to carry out additional data processing, it will provide prior information regarding the essential circumstances of the data processing (the legal background and legal basis of the data processing, the purpose of the data processing, the scope of the data processed, and the duration of the data processing).

## **Recipients of Personal Data**

### **Data processing for the storage of personal data**

**Name of the data processor:** Rackhost Zrt.

**Contact details of the data processor:**

**Email address:** info@rackhost.hu

**Headquarters:** 6722 Szeged, Tisza Lajos körút 41

**Website:** rackhost.hu

The Data Processor is responsible for storing personal data under the contract with the Data Controller. The Data Processor is not authorized to access personal data.

## **Your Rights Regarding Data Processing**

During the data processing period, you are entitled to the following rights in accordance with the Regulation:

- The right to withdraw consent
- Access to personal data and information related to data processing
- The right to rectification
- The right to restrict processing
- The right to erasure
- The right to object
- The right to data portability

If you wish to exercise your rights, this will involve identifying yourself, and the Data Controller will necessarily need to communicate with you. Therefore, for identification purposes, you will need to provide personal data (but the identification can only be based on

data already processed by the Data Controller about you). Additionally, your complaints related to data processing will be accessible in the Data Controller's email system within the time frame specified in this notice for handling complaints. If you were a customer and wish to identify yourself for complaint handling or warranty service purposes, please provide your order ID for identification. This will also help us identify you as a customer. The Data Controller will respond to complaints related to data processing within 30 days at the latest.

## **Right to Withdraw Consent**

You have the right to withdraw your consent for data processing at any time, and in such cases, the provided data will be deleted from our systems. However, please note that if the order has not yet been fulfilled, withdrawal may result in the inability to complete the delivery. Additionally, if the purchase has already been completed, the accounting regulations prevent us from deleting billing-related data from our systems, and if you owe any amount to us, we may continue to process your data based on legitimate interests related to the collection of the debt, even if you withdraw your consent.

## **Right to Access Personal Data**

You have the right to receive feedback from the Data Controller regarding whether your personal data is being processed, and if so, you are entitled to:

- Access the personal data being processed, and
- Be informed by the Data Controller of the following:
  - The purposes of the data processing;
  - The categories of personal data being processed;
  - Information about the recipients or categories of recipients with whom the Data Controller has shared or will share the personal data;
  - The planned duration of data storage, or if this is not possible, the criteria for determining that duration;
  - Your right to request the rectification, erasure, or restriction of the processing of your personal data from the Data Controller, and the right to object to processing based on legitimate interests;

- The right to lodge a complaint with a supervisory authority;
- If the data was not collected directly from you, all available information about its source;
- The fact of automated decision-making (if applied), including profiling, and at least in such cases, meaningful information about the logic involved and the significance and potential consequences for you.

The purpose of exercising this right may be to determine and verify the lawfulness of the data processing, and therefore, in the case of repeated requests for information, the Data Controller may charge a reasonable fee for providing the information. Access to personal data will be provided by the Data Controller by sending the processed personal data and information via email after your identification. If you have a registered account, we provide access by allowing you to view and verify your personal data through your user account. Please specify in your request whether you are seeking access to personal data or information related to data processing.

## **Right to Rectification**

You have the right to have inaccurate personal data concerning you corrected by the Data Controller without undue delay upon request.

## **Right to Restrict Data Processing**

You have the right to request that the Data Controller restrict the processing of your personal data if any of the following applies:

- You contest the accuracy of the personal data, in which case the restriction applies for the period during which the Data Controller can verify the accuracy of the personal data. If the accurate data can be established immediately, the restriction will not apply;
- The data processing is unlawful, but you oppose the deletion of the data for any reason (e.g., because the data is necessary for you to exercise or defend legal claims), and instead request the restriction of their use;
- The Data Controller no longer needs the personal data for the purposes of the processing, but you require them for legal claims;

- You have objected to the data processing, and the Data Controller's legitimate interests may justify the data processing. In this case, the processing must be restricted until it is determined whether the Data Controller's legitimate grounds override your interests.

If the processing is restricted, such personal data may only be processed (except for storage) with your consent, or for the establishment, exercise, or defense of legal claims, or to protect the rights of another person or entity, or for reasons of important public interest of the Union or a Member State. The Data Controller will inform you in advance (at least 3 working days before lifting the restriction) about the lifting of the restriction.

## **Right to Erasure (Right to Be Forgotten)**

You have the right to have the Data Controller delete personal data concerning you without undue delay if any of the following grounds apply:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- You withdraw your consent, and there is no other legal basis for the processing;
- You object to the processing based on legitimate interests, and there is no overriding legitimate ground for the processing;
- The personal data has been unlawfully processed, as determined by a complaint;
- The personal data must be erased to comply with a legal obligation under Union or Member State law.

If the Data Controller has made the personal data public and is required to delete it for any of the above reasons, the Data Controller must take reasonable steps, including technical measures, considering the available technology and implementation costs, to inform other controllers processing the personal data that you have requested the deletion of any links to, or copies or replication of, such personal data.

The right to erasure does not apply if the data processing is necessary for:

- The exercise of the right to freedom of expression and information;
- Compliance with a legal obligation that requires processing under Union or Member State law (e.g., data processing related to invoicing, as retention of invoices is mandated by law), or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- The establishment, exercise, or defense of legal claims (e.g., if the Data Controller has a claim against you and it has not yet been fulfilled, or if a consumer, data processing, or other complaint is ongoing).

## **Right to Object**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data based on legitimate interests. In this case, the Data Controller will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

If personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, including profiling related to direct marketing. If you object to the processing for direct marketing purposes, the personal data will no longer be processed for such purposes.

## **Right to Data Portability**

If the data processing is carried out by automated means or based on your voluntary consent, you have the right to request that the Data Controller provide the data you have given to the Data Controller in xml, JSON, or csv format, and, if technically feasible, to request that the Data Controller transmit the data to another controller in this format.

## **Automated Decision-Making**

You have the right not to be subject to a decision based solely on automated processing (including profiling) that significantly affects you. In such cases, the Data Controller is

required to implement appropriate measures to protect your rights, freedoms, and legitimate interests, including the right to request human intervention on the part of the Data Controller, express your point of view, and contest the decision.

This right does not apply if the decision:

- Is necessary for the conclusion or performance of a contract between you and the Data Controller;
- Is authorized by Union or Member State law applicable to the Data Controller, which also lays down suitable measures to safeguard your rights, freedoms, and legitimate interests; or
- Is based on your explicit consent.

## **Data Security Measures**

The Data Controller declares that it has implemented appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as against accidental destruction and damage, and to prevent data becoming inaccessible due to changes in the technology used. The Data Controller, within the scope of its organizational and technical capabilities, ensures that its Data Processors also implement appropriate data security measures when processing your personal data.

## **Remedies**

If you believe that the Data Controller has violated any legal provision regarding data processing or has not fulfilled any of your requests, you may initiate an investigation procedure by the National Authority for Data Protection and Freedom of Information to terminate the alleged unlawful data processing.

We also inform you that in the case of a violation of legal provisions related to data processing, or if the Data Controller has not fulfilled any of your requests, you may file a civil lawsuit against the Data Controller in court.

## **Modification of the Privacy Notice**

The Data Controller reserves the right to modify this privacy notice in a way that does not affect the purpose and legal basis of the data processing. By continuing to use the website after the entry into force of the modification, you accept the modified privacy notice.

If the Data Controller intends to carry out further data processing for purposes other than those for which the data was collected, you will be informed in advance of the purpose of the data processing and the following information:

- The duration of the storage of personal data, or if this is not possible, the criteria for determining the duration;
- Your right to request access, correction, deletion, or restriction of the processing of your personal data, and, in the case of processing based on legitimate interest, your right to object to the processing of personal data, as well as, in the case of processing based on consent or a contractual relationship, your right to request the provision of the right to data portability;
- In the case of data processing based on consent, your right to withdraw consent at any time;
- The right to file a complaint with the supervisory authority;
- Whether the provision of personal data is based on a legal or contractual obligation, or a precondition for concluding a contract, and whether you are required to provide personal data, as well as the possible consequences of not providing the data;
- The fact of automated decision-making (if such a process is used), including profiling, and at least in these cases, understandable information about the logic involved and the expected significance and consequences of such processing for you.

Data processing can only begin after you have been informed of this, and if the legal basis for the data processing is consent, you must also give your consent to the processing.