

# Privacy Policy

## Purpose of the Prospectus

1.1. The purpose of this prospectus is to provide appropriate guidance to visitors to the hydraulicscentrum.com website (hereinafter: Service Provider) and to the users of the service (hereinafter collectively: Stakeholders) on the protection of personal data pursuant to Act CXII of 2011 on the right to information self-determination and freedom of information. and Regulation 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (EU) of 27 April 2016.

1.2. This data management information regulates the data management of the following pages (webpage / website, webshop):  
www.hydraulicscentrum.com

The data management information is available at: <http://hydraulicscentrum.com/adatvedelmi-tajekoztato>

Amendments to the prospectus will take effect upon publication at the address above.

## Name and contact details of the data controller

Name: Nyírség Nehézgép 93 Bt.

Headquarters: 4400 Nyíregyháza, Bokréta utca 23.

Email: [info@hydraulicscentrum.com](mailto:info@hydraulicscentrum.com)

Phone number: +36-30-151-4835

Company registration number: 15-06-081769

Tax number: 25651218-2-15

## Concept Definitions

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); identify a natural person who, directly or indirectly, in particular on the basis of an identifier such as name, number, location, online identifier or one or more factors relating to the natural person's physical, physiological, genetic, mental, economic, cultural or social identity identified;

"Data processing" means any operation or set of operations on personal data or data files, whether automated or non-automated, such as collection, recording, systematisation, sorting, storage, transformation or alteration, retrieval, consultation, use, communication, transmission, distribution or otherwise harmonization or interconnection, restriction, deletion or destruction;

"Controller" means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;

"Processor" means any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

"Recipient" means a natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not. Public authorities that may have access to personal data in the framework of an individual investigation in accordance with Union or Member State law shall not be considered as recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

"Consent of the data subject" means a voluntary, specific and well-informed and unambiguous statement of the will of the data subject, by which he or she indicates his or her consent to the processing of personal data concerning him or her by means of a statement or unambiguous statement;

"Data protection incident" means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data which have been transmitted, stored or otherwise handled.

"Third party" means any natural or legal person, or any entity without legal personality, other than the data subject, the controller or the processor.

## Principles for the Processing of Personal Data

Personal Data:

- a) be processed lawfully and fairly and in a way that is transparent to the data subject ("legality, due process and transparency");
- b) collected only for specified, explicit and legitimate purposes and not treated in a way incompatible with those purposes; further processing for data purposes for archiving in the public interest, for scientific and historical research purposes or for statistical purposes shall not be considered incompatible with the original purpose in accordance with Article 89 (1) ("purpose limitation");
- c) they must be appropriate and relevant to the purposes of the data processing and limited to what is necessary ("data saving");
- d) they must be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes of the processing are erased or rectified without delay ("accuracy");
- e) it must be stored 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 a longer period only if the processing of personal data is carried out in accordance with Article 89 (1) for archiving in the public interest, for scientific and historical research purposes or for statistical purposes, in accordance with this Regulation; subject to the implementation of appropriate technical and organizational measures to protect its freedom ("limited storage capability");
- f) shall be handled in such a way as to ensure the adequate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage to personal data ("integrity and confidentiality"), using appropriate technical or organizational measures.

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability").

## Purpose, Legal Basis and Method of Data Processing

The Data Controller manages the provided data only for the purpose of determining, modifying, fulfilling, invoicing the content of the service requested by the Stakeholders on the Website, and for enforcing the related claims, as well as for other operations requested by the Stakeholders (eg sending newsletters).

5.1. Data Management Related to the Operation of the Webshop and the Website

5.1.1. Scope of Managed Data and Purpose of Data Management:

Purpose of personal data and data management: username (identification, enabling registration), password (for secure access to the

user account), surname and first name (required for contacting, purchasing and issuing a valid invoice, e-mail address (contact number), telephone number (contact, more efficient coordination of billing or delivery issues), billing name and address (issuing a regular invoice, as well as creating, defining, modifying, monitoring the performance of the contract, invoicing the resulting fees, and validation of related claims), delivery name and address (allow home delivery), date of purchase / registration (technical operation), IP address at the time of purchase / registration (for performing technical operations).

Neither your username nor your email address is required to contain personal information.

5.1.2. Stakeholders: All stakeholders registered / buyers on the webshop website.

5.1.3 Duration of data management, deadline for deleting data: By deleting the registration immediately. The controller shall inform the data subject electronically in accordance with Article 19 of the GDPR of the deletion of any personal data provided by the data subject. If the data subject's request for cancellation also covers the e-mail address provided by the data subject, the data controller will also delete the e-mail address after the notification. Except in the case of accounting documents, as these data must be kept for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting. In the case of a customer who does not require registration, the data will be deleted 90 days after the purchase.

The accounting document (including general ledger accounts, analytical and detailed records) supporting the accounting accounts, directly and indirectly, must be kept in a legible form for at least 8 years, retrievable by reference to the accounting records.

5.1.4. Persons of potential data controllers entitled to access the data, recipients of personal data: Personal data may be processed by the authorized employees of the data controller in accordance with the contents of this prospectus.

5.1.5. Description of data subjects' rights in relation to data processing:

The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and

may object to the processing of such personal data, and

- the data subject has the right to data portability and to withdraw his or her consent at any time.

5.1.6. Access to, deletion, modification or restriction of the processing of personal data, portability of data, protest against data processing can be initiated by the data subject in the following ways:

– postai úton 4400 Nyíregyháza, Debreceni u 162.

– by e-mail to [info@hydraulicscentrum.com](mailto:info@hydraulicscentrum.com),

- by phone at + 36-30-151-4835.

5.1.7. Legal basis for data management:

The legal basis for data management is the voluntary consent of the users, by checking the box indicated when entering the data. Buying in the web store is not subject to registration.

Article 6 (1) (b) of the GDPR,

Act CVIII of 2001 on certain issues of electronic commerce services and information society services. Act (hereinafter: Elker Act) 13 / A. § (3):

The service provider may process the personal data that are technically necessary for the provision of the service in order to provide the service. If the other conditions are the same, the service provider must choose and in all cases operate the means used in the provision of the information society service in such a way that personal data is processed only if it is necessary for the provision of the service and other purposes specified in this Act. necessary, but in this case only to the extent and for the time necessary.

Article 6 (1) (c) if the invoice is issued in accordance with accounting legislation.

In the case of enforcement of claims arising from the contract, Act V of 2013 on the Civil Code 6:21. § 5 years.

6:22. § [Limitation]

(1) Unless otherwise provided by this Act, claims shall lapse within five years.

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

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

(4) An agreement excluding limitation is void.

We inform you that

the data management is necessary for the performance of the contract.

is required to provide personal information so that we can fulfill your order.

- failure to provide information will result in the inability to process your order.

5.2. Sending newsletters and electronic messages (e-mails) containing advertisements

5.2.1. During the purchase in the web store or on the newsletter subscription form placed on the website, the Data Subject may consent to the Service Provider sending him a newsletter with marketing content. Stakeholders can unsubscribe at any time using the link at the bottom of the newsletter.

5.2.2. Activity performed by the data processor: sending newsletters and electronic messages containing advertisements to the data subjects.

5.2.3. Name and contact details of the data processor:

Sending Newsletters: provided by the operator of the newsletter sending service of Unas Online Kft

Headquarters: H-9400 Sopron, Kőszegi u. 14.

Company registration number: 08-09-015594

Tax number: 14114113-2-08

Email: [unas@unas.hu](mailto:unas@unas.hu)

5.2.4. The fact of data management, the scope of managed data: Name, email address.

5.2.5. Stakeholders: All stakeholders have subscribed to the newsletter and electronic messages containing advertisements.

5.2.6. The purpose of data management is to send the newsletter requested by the data subject and electronic messages containing advertisements.

5.2.7. Legal basis for data processing: consent of the data subject, Article 6 (1) (a) and (f), and Article XLVIII of 2008 on the basic conditions and certain restrictions on commercial advertising. Section 6 (5) of the Act:

The advertiser, the advertising service provider or the publisher of the advertisement shall keep a register of the personal data of the

persons who have made a statement to them, within the scope specified in the consent. The data contained in this register relating to the recipient of the advertisement may be processed only in accordance with the statement of consent, until it is withdrawn, and may be disclosed to third parties only with the prior consent of the person concerned.

5.2.8. Duration of data management, deadline for deleting data: data management lasts until the withdrawal of the consent statement, ie until unsubscription.

Description of Data Subjects' Rights in Relation to Data Processing:

The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and

may object to the processing of such personal data, and

- the data subject has the right to data portability and to withdraw his or her consent at any time.

Access to, deletion, modification or restriction of the processing of personal data, portability of data, protest against data processing can be initiated by the data subject in the following ways:

- by post 4400 Nyíregyháza, Debreceni u 162.

- by e-mail to [info@hydraulicscentrum.com](mailto:info@hydraulicscentrum.com),

- by phone at + 36-30-151-4835.

### 5.3. Management of Cookies

5.3.1. Web store-specific cookies are so-called "passwords used for a password-protected session", "shopping cart cookies" and "security cookies", the use of which does not require the prior consent of the parties involved.

5.3.2. The fact of data management, the scope of data managed: Unique identification number, dates, times

5.3.3. Stakeholders: All stakeholders who visit the website.

5.3.4. The purpose of data management is to identify users, record a "shopping cart" and track visitors.

5.3.5. Duration of data management, deadline for deleting data:

Cookie type: Session cookies

Legal basis of data management: Act CVIII (Elker Act) 13/A. § (3) of 2001 on certain issues of electronic commerce services and information society services.

Duration of data management: The period of time until the end of the relevant visitor session

5.3.6. Identity of potential data controllers entitled to access the data: The data controller does not process personal data by using cookies.

5.3.7. Description of the data subjects' rights related to data management: The data subject has the possibility to delete cookies in the Tools/Settings menu of the browser, usually under the settings of the Privacy menu item.

5.3.8. Legal basis for data processing: The consent of the data subject is not required if the sole purpose of the use of cookies is the transmission of communications via an electronic communications network or the provision of an information society service specifically requested by the subscriber or user.

### 5.4. Use of GOOGLE ADWORDS Conversion Tracking

5.4.1. The online advertising program, called "Google AdWords," is used by the data controller and uses Google's conversion tracking service.

5.4.2. When a User accesses a website via a Google ad, a cookie to track conversion is placed on their computer. These cookies have a limited validity and do not contain any personal data, so the User cannot be identified by them.

5.4.3. When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller may see that the User has clicked on the advertisement.

5.4.4. Each Google AdWords customer receives a different cookie, so they cannot be tracked through AdWords customers' websites.

5.4.5. The information obtained through conversion tracking cookies is used to generate conversion statistics for AdWords conversion tracking customers. This is how customers find out the number of users who clicked on your ad and were redirected to a page with a conversion tracking tag. However, they do not have access to information that could identify any user.

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

5.4.7. More information and Google's privacy statement can be found at [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/)

### 5.5 Use of GOOGLE ANALYTICS

5.5.1. This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses so-called "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

5.5.2. On behalf of the operator of this website, Google will use this information to evaluate how the user has used the website, to provide the website operator with reports related to the website's activity and to provide additional services related to the use of the website and the internet.

5.5.3. Within the framework of Google Analytics, the IP address transmitted by the User's browser is not reconciled with other data of Google.

### 5.6. FACEBOOK

5.6.1. The fact of data collection, the scope of the managed data: the name registered on Facebook social media sites, and the user's public profile picture.

5.6.2. Stakeholders: All stakeholders who have registered on Facebook social media sites and "liked" the website.

5.6.3. The purpose of data collection: To share or "like" and promote certain content elements, products, promotions or the website itself on social networking sites, to inform visitors by embedding entries in the website.

5.6.4. Duration of data processing, deadline for deletion of data, identity of potential data controllers entitled to access the data and data subjects' rights related to data processing: The data subject can find out about the source of the data, its processing, the method and legal basis Data management is carried out on social networking sites, so the duration and method of data management, as well as the possibilities of deleting and modifying data, are regulated by the given social networking site.

5.6.5. Legal basis for data processing: the voluntary consent of the data subject to the processing of his or her personal data on

social networking sites.

#### 5.7. Contacting Customers

5.7.1. If you have any questions or problems with the use of our data management services, you can contact the data controller in the ways provided on the website (telephone, e-mail, social networking sites, etc.).

5.7.2. Data manager for incoming emails, messages, phone, Facebook, etc. will delete the data provided together with the name and e-mail address of the interested party, as well as any other personal data voluntarily provided, no later than 2 years after the communication.

5.7.3. Information on data processing not listed in this prospectus will be provided at the time of data collection.

5.7.4. Upon exceptional official request, or in case of contacting other bodies based on the authorization of legislation, the Service Provider is obliged to provide information, communicate and hand over data, and make documents available.

5.7.5. In these cases, the Service Provider will provide the requester with personal data only to the extent and to the extent that is absolutely necessary to achieve the purpose of the request, provided that it has indicated the exact purpose and scope of the data.

## The Used Data Processors

### Transportation

Activity of data processing: Delivery of goods, transportation

Name and contact details of the data processor:

- TNT Express

Address: 1185 Budapest, International Airport Terminal 1 TNT Building 283

Privacy Policy: [https://www.tnt.com/express/hu\\_hu/site/privacy-policy.html](https://www.tnt.com/express/hu_hu/site/privacy-policy.html)

The fact of data management, the scope of the managed data: Delivery name, delivery address, telephone number, e-mail address.

Stakeholders: All stakeholders requesting home delivery.

Purpose of data management: Home delivery of the ordered product.

Duration of data management, deadline for deleting data: It lasts until the home delivery is completed.

Legal basis for data processing: Article 6 (1) (b).

### Hosting provider

Activity of data processing: Hosting services

Name and contact details of the data processor: Unas Online Kft., H-9400 Sopron, Kőszegi u. 14. contact: unas@unas.hu

Fact of data management, scope of data processed: All personal data provided by the data subject.

Stakeholders: All stakeholders who use the website.

The purpose of data management: To make the website available and to operate it properly.

Duration of data processing, deadline for deletion of data: The data processing lasts until the termination of the agreement between the data controller and the hosting provider, or until the data subject's request for deletion to the hosting provider.

Legal basis for data processing: Article 6 (1) (c) and (f) and Article CVIII 13 / A. § (3) of 2001 on certain aspects of electronic commerce services and information society services.

Accounting:

Activity performed by a data processor: accounting tasks

Name and contact details of the data processor: Nyír-Intéző Kft., [garaitibi@t-online.hu](mailto:garaitibi@t-online.hu), Address: 4400 Nyíregyháza, Krúdy Gy. u. 42. I/42.,

The fact of data management, the scope of the managed data: Billing name, Billing address, Delivery name, delivery address, telephone number, e-mail address, data related to invoicing and payment.

Stakeholders: All stakeholders who place an order on the website.

The purpose of data management: To perform customer service work related to the services of the website, as well as to issue invoices / perform accounting tasks in accordance with legal regulations.

Duration of data management, deadline for deleting data: By deleting the registration immediately. The controller shall inform the data subject electronically in accordance with Article 19 of the GDPR of the deletion of any personal data provided by the data subject. If the data subject's request for cancellation also covers the e-mail address provided by the data subject, the data controller will also delete the e-mail address after the notification. Except in the case of accounting documents, as these data must be kept for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting. In the case of a customer who does not require registration, the data will be deleted 30 days after the purchase.

The accounting document (including general ledger accounts, analytical and detailed records) supporting the accounting accounts, directly and indirectly, must be kept in a legible form for at least 8 years, retrievable by reference to the accounting records.

Legal basis for data processing: Article 6 (1) (c) of the GDPR and Article CVIII 13 / A. § (3) of 2001 on certain aspects of electronic commerce services and information society services.

Rights of the data subject:

You can find out about the conditions of data management,

b. You have the right to receive feedback from the controller as to whether your personal data is being processed and to have access to all information related to the processing.

c. You have the right to receive your personal information about you in a structured, widely used, machine-readable format.

d. You have the right, at the request of the data controller, to correct inaccurate personal data without undue delay.

## Rights of Data Subjects

### 7.1. Right of Access

You have the right to receive feedback from the controller as to whether your personal data is being processed and, if such processing is in progress, you have the right to access your personal data and the information listed in the Regulation.

### 7.2. Right of Rectification

You have the right, at the request of the data controller, to correct inaccurate personal data concerning you without undue delay. Taking into account the purpose of the data processing, you have the right to request that the incomplete personal data be supplemented by means of a supplementary statement.

### 7.3. Right of Cancellation

You have the right, at the request of the controller, to delete your personal data without undue delay, and the controller is obliged to delete your personal data without undue delay under certain conditions.

#### 7.4. The Right to Enforce to Forget the Data

If the controller has disclosed the personal data and is obliged to delete it, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that you have requested the personal data in question. deleting links or copies or duplicates of such personal data.

#### 7.5. Right to Restrict Data Processing

You have the right, at the request of the controller, to restrict the processing of data if one of the following conditions is met:

- You dispute the accuracy of the personal data, in which case the restriction applies to the period of time that allows the controller to verify the accuracy of the personal data;
- the data processing is illegal and you oppose the deletion of the data and instead ask for a restriction on its use;
- the data controller no longer needs the personal data for the purpose of data processing, but you require them to make, enforce or protect legal claims;
- You objected to the data processing; in this case, the restriction applies for as long as it is established whether the legitimate reasons of the controller take precedence over your legitimate reasons.

#### 7.6. The Right of Data Portability

You have the right to receive personal data about you provided by you to a data controller in a structured, widely used machine-readable format and to transfer this data to another data controller without being hindered by the data controller whose provided the personal data to him / her (...)

#### 7.7. Right to Protest

You have the right to object at any time to the processing of your personal data (...), including profiling based on the said provisions, for reasons related to your own situation.

#### 7.8. Protest in Case of Direct Acquisition

If personal data is processed for the purpose of direct business acquisition, you have the right to object at any time to the processing of personal data concerning you for this purpose, including profiling, insofar as it relates to direct business acquisition. If you object to the processing of personal data for the purpose of direct business acquisition, the personal data may no longer be processed for this purpose.

#### 7.9. Automated Decision Making in Individual Cases, Including Profiling

You have the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effect or similar effect on him or her.

The preceding paragraph shall not apply if the decision:

- Necessary for the conclusion or performance of a contract between you and the data controller;
- EU or Member State law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- It is based on your express consent.

## Other Provisions

8.1. The data controller shall ensure the security of the data and shall take the technical measures to ensure that the recorded, stored and processed data are protected and shall take all necessary measures to prevent their destruction, unauthorized use and unauthorized alteration. It also undertakes to call on any third party to whom the data may be transmitted or transferred to fulfill its obligations in this regard.

8.2. When processing the data, the Data Controller shall act with the utmost care, comply with the provisions of the law, treat them confidentially and do not make them available to third parties, unless this is necessary to enforce his rights under the contract or the transfer of data to the authorities, or ordered by a final official or court decision.

8.3. The Data Controller reserves the right to unilaterally amend my prospectus by notifying the Stakeholders, after the amendment enters into force, the Stakeholders accept the contents of the amended Prospectus by their implied behavior using the service.

## Informing the Data Subject about the Data Protection Incident

9.1. If the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject of the data protection incident without undue delay.

9.2. The information provided to the data subject shall clearly and intelligibly describe the nature of the data protection incident and the name and contact details of the data protection officer or other contact person providing further information; the likely consequences of the data protection incident must be described; a description of the measures taken or planned by the controller to remedy the data protection incident, including, where appropriate, measures to mitigate any adverse consequences arising from the data protection incident.

9.3. The data subject need not be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organizational protection measures and these measures have been applied to the data affected by the data protection incident, in particular those measures, such as the use of encryption, which make it incomprehensible to persons not authorized to access personal data;
- the controller has taken further measures following the data protection incident to ensure that the high risk to the data subject's rights and freedoms is no longer likely to materialize;
- information would require a disproportionate effort. In such cases, the data subject shall be informed through publicly available information or a similar measure shall be taken to ensure that the data subject is informed in an equally effective manner.

9.4. If the controller has not yet notified the data subject of the data protection incident, the supervisory authority may, after considering whether the data protection incident is likely to involve a high risk, order that the data subject be informed.

## Report a Privacy Incident to the Authority

The data protection incident shall be reported by the controller to the supervisory authority competent under Article 55 without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is not likely to jeopardize the rights of individuals. and freedoms. If the notification is not made within 72 hours, the reasons for the delay must be provided.

## Complaints

Complaints against possible breaches of the data controller can be lodged with the National Data Protection and Freedom of Information Authority:

National Data Protection and Freedom of Information Authority  
1125 Budapest, Szilágyi Erzsébet fasor 22/C.  
Mailing address: 1530 Budapest, Mailbox: 5.  
Phone number: +36 -1-391-1400  
Fax: +36-1-391-1410  
Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

With regard to data management and processing, Act CXIX of 1995 on the management of name and address data for the purpose of research and direct business acquisition. Act LXIII of 1992 on the protection of personal data and the disclosure of data of public interest. Act XLVIII of 2008 on the basic conditions and restrictions of economic advertising activity. The relevant provisions of Act CXII of 2011 on the protection of personal data on the right to information self-determination and freedom of information. The provisions of Act 2016/679 of the European Parliament and of the Council of 27 April 2016 shall apply.

Dated: 2019. Nyíregyháza, 12.09.