

PRIVACY POLICY

**of the webshop operated by Cosycanusa Bútorforgalmazó
és Szállító Korlátolt Felelősségű Társaság at the address**

<http://cosycanusa.com/>

I. INTRODUCTORY PROVISIONS, PURPOSE, AND SCOPE OF THE POLICY

Cosycanusa Kft. (hereinafter: the “Data Controller” or the “Company”), having its registered seat at HU-3326 Ostoros, Hullám tér 23., through this Privacy Policy (hereinafter: the “Policy”), informs data subjects about its data processing practices related to purchases made in the online store operated at the following web address: <http://cosycanusa.com/>

The Data Controller considers the protection of the personal data provided by its natural person customers/visitors/clients to be of utmost importance. Accordingly, it handles such data confidentially and takes all necessary technical and organizational measures to ensure their security. In this regard, the Data Controller undertakes that the data processing described in this Policy complies with the relevant provisions of Hungarian and European Union law.

The Data Controller reserves the right to modify this Policy at any time. The valid version of the Policy shall be published on the website www.cosycanusa.com prior to the entry into force of any changes, and data subjects shall be informed thereof on the website. The Data Controller accepts the provisions of this Policy as binding upon itself and acts accordingly when processing personal data.

Questions regarding this Policy may be submitted via the following email address or other contact details specified in Section II:

info@cosycanusa.com

The data processing of the Data Controller is primarily governed by the following legal regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR),
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.),
- Act V of 2013 on the Civil Code (Ptk.),
- Act C of 2000 on Accounting (Sztv.),
- Act CLXIV of 2005 on Trade (Kertv.),
- Act CLV of 1997 on Consumer Protection (Fgytv.),
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Eker tv.),
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Gr.t.),
- Act CL of 2017 on the Rules of Taxation (Art.),
- Act CLIX of 2012 on Postal Services (Posta tv.).

Purpose of the Policy: This Policy defines the principles applicable to the processing of personal data of natural persons (data subjects) by the Data Controller, provides information to data subjects regarding their rights in relation to their personal data and the means of exercising those rights, specifies the personal data processed by the online store, and details the Data Controller’s contact information and available legal remedies.

Temporal scope: This Policy is valid from **2025.09.01.** until revoked or modified.

Personal scope: This Policy applies to the Data Controller and all natural persons affected by the Data Controller’s data processing activities.

Material scope: This Policy applies to all data processing activities of the Data Controller, regardless of whether they are performed electronically or on paper.

Before placing an order (making a purchase) through the online store, please carefully review the General Terms and Conditions (GTC). To place an order in the online store, the buyer (data subject) must expressly accept the GTC and, by ticking the appropriate boxes, give consent to the data processing based on the information provided in this Privacy Policy.

II. THE DATA CONTROLLER AND THE HOSTING SERVICE PROVIDER – IDENTITY AND CONTACT DETAILS

DATA CONTROLLER:

Company name: Cosycanusa Kft.

Company registration number: 10-09-039484

Registered seat: 3326 Ostoros, Hullám tér 23.

Tax number: 10610813-2-10

Website: www.cosycanusa.com

Email address: info@cosycanusa.com

HOSTING SERVICE PROVIDER:

Company name: Rackhost Zrt.

Registered seat: 6722 Szeged, Tisza Lajos körút 41.

Company registration number: 06-10-000489

Tax number: 25333572-2-06

Email for electronic communication: info@rackhost.hu

Telephone: +36 1 445 1200

III. DEFINITIONS

The following key definitions are used throughout this Policy:

Affected person: any natural person identified or identifiable on the basis of any information.

Personal data: Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Rights of the affected: Right to information, right of access to personal data, right to rectification, right to erasure, right to restriction of processing, right to data portability, right to withdraw consent, right to object including profiling, right to turn to the courts or to the Authority, procedural deadlines and rules, right to compensation and non-pecuniary damages.

Data controller: A natural or legal person, public authority, agency, or 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processing of personal data: Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Data transfer: Making data available to a specific third party.

Processor: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Data erasure: Rendering data unrecognizable in such a way that its recovery – whether from paper-based or electronic records – is no longer possible.

Profiling: Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements. *The Data Controller does not carry out profiling in connection with the operation of the online store.*

Recipient: A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third country: Any state that is not a member of the European Economic Area (EEA).

Consent of the data subject: Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. Consent may be withdrawn at any time, free of charge and without restriction.

Data protection incident (GDPR): A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

Website/Online store: The website operated by the Data Controller at www.cosycanusa.hu, which also functions as an online store.

Product: Goods and products available for purchase online through the online store.

Customer: A person who visits or browses the website/online store not only for information purposes, but with the intention of purchasing products and who buys the product(s) they desire.

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IV. PRINCIPLES, LEGAL BASIS AND DURATION OF DATA PROCESSING

In accordance with the provisions of the GDPR, the Data Controller applies and adheres to the following data processing principles, which are binding upon itself:

Principles of data processing

Lawfulness, fairness and transparency: Personal data must be processed lawfully, fairly, and in a transparent manner in relation to the affected person.

Purpose limitation: Personal data shall be collected only for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Data minimization: Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy: Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data are erased or rectified without delay, having regard to the purposes for which they are processed.

Storage limitation: Personal data shall be kept in a form which permits identification of affected persons for no longer than is necessary for the purposes for which the personal data are processed.

Integrity and confidentiality: Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, by implementing appropriate technical and organizational measures.

Accountability: The Data Controller shall be responsible for compliance with the above principles and must be able to demonstrate such compliance.

Necessity and proportionality: In essence, this principle corresponds to the principle of data minimization.

Legal basis of data processing under the GDPR

Each data processing activity shall have **only one legal basis**. The selection of the appropriate legal basis is determined according to Article 6(1) of the GDPR, which sets out six possible legal bases — without any ranking among them. Following the order set forth in the GDPR, the six possible legal bases are presented below.

- a. The affected person has given consent to the processing of their personal data for one or more specific purposes.
- b. Processing is necessary for the performance of a contract to which the affected person is a party, or to take steps at the request of the affected person prior to entering into a contract.
- c. Processing is necessary for compliance with a legal obligation to which the Data Controller is subject.
- d. Processing is necessary to protect the vital interests of the affected person or of another natural person.
- e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

- f. Processing is necessary for the purposes of legitimate interests pursued by the Data Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the affected person, particularly where the affected person is a child.

The Data Controller specifies the legal basis of each individual data processing activity separately in **Section V** of this Policy.

Duration of data processing

Similar to the legal basis, the duration of each data processing activity is also specified separately in this Policy, regardless of whether the processing is based on: the voluntary consent of the affected person, the performance of a contract, a legal obligation imposed by law, or a legitimate interest of the Data Controller.

V. PERSONAL DATA PROCESSED IN CONNECTION WITH THE OPERATION OF THE ONLINE STORE

V/1. REGISTRATION IN THE ONLINE STORE

The customer has the option to register in the online store. The password provided by the customer is stored in an encrypted form; it cannot be viewed or retrieved by either the Data Controller or any data processors. If the customer forgets the password, they may use the “forgot password” function, which sends a link to their email address. By clicking the link, they are redirected to a page where they can set a new password.

After registration, the customer can log into their account and access the “My Profile” section, where all stored data (billing, shipping, and contact information) are displayed. In the “My Profile” section, the customer may also: download all data provided in the online store, and delete their account. Upon deletion, the Data Controller also deletes the account and all associated personal data, without requiring a separate written request.

If the customer does not log into their registered account for 1 year from the date of their last login, the Data Controller will notify them via email that the registration will be automatically deleted within 7 days, unless the customer logs in again within that period.

Category of affected persons	Categories of personal data processed	Duration of data processing
All affected persons who register in the online store.	Full name, username, email address, password (the password is only known to the affected person).	Until the withdrawal of the affected person's consent and/or deletion of their registered account.

- **Legal basis of processing:** Voluntary consent of the affected person (Article 6(1)(a) of the GDPR)
- **Source of data:** Directly from the affected person.
- **Purpose of processing:** Secure access to the user account, identification, communication, and facilitation/simplification of purchases.
- **Consequences of failure to provide data:** Registration cannot be completed.

- **Recipients of personal data:**

1. **Hosting service provider:** Rackhost Zrt. (registered seat: 6722 Szeged, Tisza Lajos körút 41., company registration number: 06-10-000489, tax number: 25333572-2-06, e-mail: info@rackhost.hu, phone number: +36 1 445 1200) Purpose of data transfer: facilitation of purchases; Legal basis: Article 6(1)(b) of the GDPR – processing necessary for the performance of a contract (product delivery).

- **Data transfer to third countries:** None.

- **Automated decision-making and profiling:** The Company does not perform any automated decision-making or profiling. Affected persons are not scored or categorized based on any system or criteria.

The affected person may withdraw their voluntary consent to the processing of their personal data for the purpose described above at any time by sending a written declaration to any of the contact details provided in Section II of this Policy, or by deleting their user account as described above. Withdrawal of consent is free of charge and without any restrictions, and does not affect the lawfulness of processing based on consent prior to its withdrawal.

V/2. PURCHASE IN THE ONLINE STORE

The Data Controller processes and stores electronically, within its internal system, the data of affected persons who make purchases through the online store for the period specified below.

Category of affected persons	Categories of personal data processed	Duration of data processing
All natural persons who purchase products available in the online store	Name, email address, telephone number, billing and shipping data (country, city, street, square, house number, floor, door number), the identification and quantity of the ordered product(s), the total price payable, the selected payment and delivery method, and the date of purchase. In the case of business entities (legal persons, sole entrepreneurs, etc.), the name, position, email address, and mobile phone number of the designated contact person.	For five (5) years in accordance with Section 6:22(1) of the Hungarian Civil Code (Ptk.), which provides that claims arising from a contract expire after five years.

- **Legal basis of processing:** Voluntary consent of the affected person (Article 6(1)(a) of the GDPR)
- **Source of data:** Directly from the affected person.
- **Purpose of processing:** To carry out purchases made in the online store, fulfill orders, maintain records and identification of customers, communicate with them, and document purchases and payments.
- **Consequences of failure to provide data:** The purchase in the online store cannot be completed.
- **Recipients of personal data:**

1. **Hosting service provider:** Rackhost Zrt. (registered seat: 6722 Szeged, Tisza Lajos körút 41., company registration number: 06-10-000489, tax number: 25333572-2-06, e-mail: info@rackhost.hu, phone number: +36 1 445 1200) Purpose of data transfer: for the purpose of enabling purchases.; Legal basis: Article 6(1)(b) of the GDPR – processing necessary for the performance of a contract (product delivery).

- **Data transfer to third countries:** None.
- **Automated decision-making and profiling:** The Company does not perform any automated decision-making or profiling. Affected persons are not scored or categorized based on any system or criteria.

V/3. ISSUING INVOICES RELATED TO PURCHASES

The Data Controller issues invoices to customers purchasing products from the online store in connection with the sale of goods distributed by the Company. Such invoices are processed and stored in the Data Controller's internal administrative / invoicing system for the duration required by applicable legislation.

Category of affected persons	Categories of personal data processed	Duration of data processing
All natural persons who purchase products available in the online store.	Name and residential address provided for billing purposes.	Eight (8) years, pursuant to Section 169 (2) of Act C of 2000 on Accounting.

- **Legal basis of processing:** Voluntary consent of the affected person (Article 6(1)(a) of the GDPR)
 - **Source of data:** Directly from the affected person
 - **Purpose of processing:** To issue an invoice evidencing the payment of the purchase price for the product purchased, and to fulfill the Data Controller's accounting obligations.
 - **Consequences of failure to provide data:** The affected person (natural person or legal entity) cannot receive a personalized invoice issued in their name.
 - **Recipients of personal data:**
 1. **Hosting service provider:** Rackhost Zrt. (registered seat: 6722 Szeged, Tisza Lajos körút 41., company registration number: 06-10-000489, tax number: 25333572-2-06, e-mail: info@rackhost.hu, phone number: +36 1 445 1200) Purpose of data transfer: for the purpose of enabling purchases.; Legal basis: Article 6(1)(b) of the GDPR – processing necessary for the performance of a contract (product delivery).
- **Data transfer to third countries:** None.
 - **Automated decision-making and profiling:** The Company does not perform any automated decision-making or profiling. Affected persons are not scored or categorized based on any system or criteria.

V/4. DATA PROCESSING RELATED TO ONLINE BANK CARD PAYMENT, GOOGLE PAY AND APPLE PAY

The Data Controller provides the option of online bank card payment for purchases made in the online store through a third-party external service provider under a contractual arrangement. In connection with such online bank card payments, the Data Controller processes the following personal data of affected persons who make purchases using online payment:

Category of affected persons	Categories of personal data processed	Duration of data processing
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Persons who make payments in the online store via bank card, Google Pay, or Apple Pay.	Saved bank card data (tokenized card storage): card number, expiration date, CVV code, and the name appearing on the bank card.	For five (5) years from the date of the payment transaction (general civil law limitation period). If required for compliance with Section 169(2) of the Accounting Act, data shall be stored for eight (8) years.
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Legitimate interest: The Data Controller processes data for fraud prevention and monitoring purposes, using personal data employed for strong customer authentication. The Data Controller's legitimate interest lies in preventing fraud related to online payments, misuse of bank cards, cyberattacks on the payment systems, circumvention of security measures, and in identifying or investigating potential or actual fraud cases. The Data Controller may also provide information to assist in criminal or other legal proceedings initiated in relation to detected frauds. Although the Data Controller is not legally obliged to initiate complaints or proceedings in connection with payment-related fraud, such cooperation is in the mutual interest of the Data Controller, the competent authorities, and society as a whole. Preventing and detecting online payment fraud strengthens public trust in online transactions, reduces the likelihood of future incidents, and serves not only the Data Controller's legitimate interest but also the public interest. Fraud prevention also reduces financial losses from refunds or chargebacks, thereby protecting the Data Controller's business interests.

If processing is based on legitimate interest, the affected person may object to the processing at any time. In such cases, the Data Controller shall conduct a new balancing test, demonstrating whether overriding legitimate interests exist that take precedence over the affected person's rights, taking into account the reasons set out in the objection.

Upon request, affected persons may review the full legitimate interest assessment. Such requests shall be submitted via the contact details of the Data Controller provided in Section II of this Policy by email or postal mail.

The Data Controller does not have access to bank card data used during online payment and is not authorized to view them under the rules of International Card Associations. Such data are processed and stored by the payment service provider in an environment certified to PCI DSS requirements.

V/5. DATA PROCESSED FOR THE DELIVERY OF PRODUCTS

The Data Controller informs affected persons that, for the delivery of products, it uses the services of the following carriers **Magyar Posta Zrt., FedEx Express Hungary Transportation Korlátolt Felelősségű Társaság, DHL Express Magyarország Kft.** (collectively referred to as "Courier Services").

Magyar Posta, FedEx Express Hungary Kft., and DHL Express Hungary Kft. are all independent data controllers regarding the processing of personal data related to the delivery of products ordered electronically through the webstore; meaning they process the personal data provided to them by the Data Controller in their own name and in compliance with their own privacy policies. You can access the privacy notices of the Courier Services that have a contractual relationship with the Data Controller by clicking on the links below:

Magyar Posta Zrt.

https://www.posta.hu/adatkezelesi_tajekoztato#1.

FedEx Express Hungary Transportation Kft.

<https://www.fedex.com/hu-hu/privacy-policy.html>

DHL Express Magyarország Kft.

<https://www.dhl.com/hu-hu/home/elolab/adatvedelmi-nyilatkozat.html>

The transfer of personal data required for delivery of products ordered electronically through the online store within the territory of EEA member states is carried out **on the basis of the contract (order) between the affected person and the Data Controller**, in accordance with **Article 6(1)(b)** of the GDPR.

Category of affected persons	Categories of personal data processed	Duration of data processing
All natural persons who purchase products from the online store and request delivery (home delivery).	Name, email address, telephone number, shipping data (country, city, street/square, house number, floor, door), identification and quantity of the ordered product(s), total price payable, selected payment and delivery method, and date of purchase.	Until the completion of the delivery process.

- **Legal basis of processing:** Voluntary consent of the affected person (Article 6(1)(b) of the GDPR)
- **Source of data:** Directly from the affected person.
- **Purpose of processing:** Delivery of products ordered from the online store to the address provided by the affected person and the necessary communication and coordination with the courier for this purpose.
- **Consequences of failure to provide data:** Failure of delivery following a purchase made in the online store.
- **Recipients of personal data:**
 1. **Magyar Posta Zrt.** (registered seat: 1138 Budapest, Dunavirág utca 2-6. phone number: +36-1-767-8200, e-mail: ugyfelszolgalat@posta.hu), Purpose: product delivery Legal basis: Article 6(1)(b) of the GDPR and Section 54(1) of the Postal Services Act (Posta tv.) – processing necessary for performance of the contract (product delivery)
 2. **FedEx Express Hungary Transportation Korlátolt Felelősségű Társaság** (registered seat: 1185 Budapest II. Logisztikai központ – Irodaépület, BUD Nemzetközi Repülőtér 283. épület, phone number: +36 29 551 900) Purpose: product delivery Legal basis: Article 6(1)(b) of the GDPR – processing necessary for performance of the contract (product delivery)
 3. **DHL Express Magyarország Kft.** (registered seat: 1185 Budapest, BUD Nemzetközi Repülőtér repülőtér 302. ép., phone number: 36 1 245 4545) Purpose: product delivery Legal basis: Article 6(1)(b) of the GDPR – processing necessary for performance of the contract (product delivery)
- **Data transfer to third countries:** None.

- **Automated decision-making and profiling:** The Company does not perform any automated decision-making or profiling. Affected persons are not scored or categorized based on any system or criteria.

V/6. REQUESTS FOR INFORMATION, COMPLAINTS, AND QUALITY OBJECTIONS (ELECTRONIC FORM)

The Data Controller also enables interested parties inquiring about a product to request information on any other matter not related to the request for a quote, as well as to submit complaints. Information can be requested at the following email address: info@cosycanusa.com.

In the case of inquiries received by phone (without recording data), the Data Controller will ask the individual to submit their question in writing to one of the contact details provided for the Data Controller in Section II, unless the inquiry can be answered simply and immediately, and/or does not need to be documented in any form.

Category of affected persons	Categories of personal data processed	Duration of data processing
Every individual who requests information from the Data Controller about its products or services, thereby providing their personal data.	Name, email address, subject of the message (in the case of a request received by post, the contact details of the person requesting information: city'S name, road, street, square, etc., house number, floor/door, postcode), and the content of the request.	Until the purpose is fulfilled.

- **Legal basis for the data processing:** the data subject's voluntary consent (Article 6 (1) (a) of the GDPR).
- **Source of data:** Directly from the affected person.
- **Purpose of processing:** providing information (responding) to the data subject and maintaining the necessary contact for this purpose.
- **Consequences of failure to provide data:** the failure of the information request
- **Data transfer to third countries:** None.
- **Automated decision-making and profiling:** The Company does not perform any automated decision-making or profiling. Affected persons are not scored or categorized based on any system or criteria.

VI. DATA PROCESSING SECURITY, DATA PROTECTION INCIDENT

The Data Controller hereby informs the Data Subjects that, pursuant to Article 32 (1) of the GDPR and GDPR Recital (83), it has implemented and continuously implements all necessary technical and organizational measures to ensure that the protection of personal data in relation to the data processing is provided in accordance with the requirements of the GDPR and to minimize the risk of data protection incidents occurring to the greatest extent possible.

In the data processing activities carried out for the purposes and legal bases listed in Section V, the Data Controller also continuously ensures that the level of protection for the data of the Data Subjects meets the standard required by the regulations.

Should a data protection incident occur for any reason, despite the data security efforts listed in this section by the Data Controller, the Data Controller will, in accordance with the severity of the incident, take without delay the measures prescribed by the relevant laws and regulations.

In the event of a data protection incident, depending on its severity (if the data breach is likely to result in a high risk to the Data Subjects), the Data Controller will notify the Data Subjects without delay and will also make the necessary report to the Authority within the prescribed 72 hours.

The employees and staff of the Data Controller who process personal data may only perform their tasks related to the processing of personal data after signing a confidentiality agreement.

VII. HANDLING OF COOKIES

What is a COOKIE?

A COOKIE is a small file that visited websites store on the computer, smartphone, tablet, etc. (hereinafter: "device") of the visitor (this term in this chapter includes anyone who visits the site for browsing purposes, the Business who registers on the site, and the Customer as well). Their use ensures that the service provider can display the website content with the content expected by the visitor (ensuring user experience), and they also make the visitor's browsing more efficient, as well as facilitate the display of content relevant to the user's interests, or are necessary for using (playing) language settings or audio and video files, for example. Furthermore, we share data concerning the visitor's use of the website with our social media, advertising, and analytics partners, who may combine this data with other data provided to them by the visitor or collected from other services used by the visitor. By continuing to browse the website, the Business consents to the use of cookies. Cookies have numerous functions, varying lifespans, and many types are known.

Based on this, we distinguish (without claiming completeness), for example:

1. Essential Cookies help to make websites usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
2. Through the anonymous collection and reporting of data, Statistical Cookies help the website owner understand how visitors interact with the website. The use of these cookies assists the Data Controller operating the website in developing, maintaining, and optimizing the performance of the site's system.
3. By using Preference Cookies, we can remember information that changes the website's behavior or appearance; an example could be the visitor's preferred language or the region they are in.
4. There are also cookies created by third parties, for example, by certain social media sites like Facebook, which, for instance, allow tracking the effectiveness of advertisements. Through the use of these cookies, the Data Controller does not see the individual user's personal data. This data is stored and processed by Facebook and may be linked to the data subject's user account and used for Facebook's advertising purposes in accordance with Facebook's Data Use Policy. The data subject can allow Facebook and its partners to display ads on and off Facebook. This category also includes Marketing Cookies, which are used to track visitors' website activity. The goal is to display relevant advertisements to individual users and encourage them to take action, which in turn makes websites more valuable for content publishers and third-party advertisers.

With regard to Section 155 (4) of Act C of 2003 on Electronic Communications ("Ehtv.") – *"Data may be stored on an electronic communications subscriber's or user's terminal equipment, or access to the data stored there may be obtained, only based on the clear and comprehensive consent of the user or subscriber concerned, which also covers the purpose of the data processing."* – if you do not wish to allow the placement of cookies, the Data Controller will not place cookies on the Business's device. Restricting cookies, however, naturally means that the website's content will not be available in the

form and with the content that the visitor intends to display, but rather only in a kind of "restricted mode," and furthermore, certain functions will not be available at all or only partially.

Cookies often store settings related to websites, such as the default language or location. When revisiting the website, the browser sends back the cookies associated with that specific website. This allows the website to provide personalized information.

By default, the collection and sending of cookie data is imperceptible to the user. However, it is possible to modify the settings in browsers, which can result in requests to approve or reject, among other things, the storage of cookies, or to delete them when the browser is closed.

Your browser can also be set up so that cookies can only be created or rejected generally with the visitor's consent. It must be noted, however, that without cookies, certain parts of the website may have limited or no functionality. The Business has the option to control and, if necessary, prevent the use of cookies by configuring the browsers as follows:

- **Microsoft Edge**

1. Select the 'Settings' menu item
2. Click on the 'Cookies and site permissions' tab
3. Click on 'Manage and delete cookies and site data' to configure the allowance of cookie data.

- **Google Chrome**

1. Click on the Chrome menu and select the 'Settings' item on the browser toolbar
2. Click on 'Privacy and security'
3. Within that, by selecting 'Third-party cookies,' you have the option to allow or block cookies.

- **Firefox**

1. Select the 'Settings' option
2. Click on the 'Privacy & Security' panel
3. Next to 'Cookies and Site Data,' you can perform the desired settings.

- **Opera**

1. Select the 'Menu' item (or 'Tools' in older versions) then the 'Settings' option
2. Click on the 'Privacy & Security' panel (or 'Advanced' > 'Privacy & security' in some versions)
3. Under the Cookies section, perform the desired settings.

- **Safari**

1. Click on the 'Safari' button (in the menu bar), then within that, on 'Preferences'
2. Click on the 'Privacy' panel
3. Next to 'Cookies and website data,' the desired settings must be performed.

VIII. CATEGORIES OF RECIPIENTS

In relation to the data processing activities associated with the operation of the webshop, the Data Controller specifies in detail under Section V, for each separate data processing activity, the recipients, i.e., the organizations or private individuals with whom it shares the personal data it

processes. For all recipients, the legal basis and purpose of the transfer of personal data are also indicated.

In addition to the recipients listed in detail for the data processing activities in Section V, further recipients may include the following authorities, organizations, and persons:

- Authorities and courts authorized to supervise the Data Controller or to oblige the Data Controller to provide data: Purpose of data transfer: Facilitating the work of the authorities and organizations, Legal basis for data transfer: Compliance with a legal obligation.
- In the case of legal proceedings initiated against the data subject: courts, enforcement officers, notaries public, the data subject's legal or business representative: Purpose of data transfer: Initiating legal proceedings, facilitating the exercise of the right of representation, Legal basis for data transfer: Compliance with a legal obligation.

X. RIGHTS OF DATA SUBJECTS

The individual rights of data subjects:

Right to information: Articles 13 and 14 of the GDPR

If personal data concerning the data subject are collected from the data subject, the data controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

- a. the identity and the contact details of the data controller and, where applicable, of the controller's representative;
- b. the contact details of the data protection officer;
- c. the purposes of the intended processing as well as the legal basis for the processing;
- d. where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the data controller or by a third party;
- e. the recipients or categories of recipients of the personal data, if any;
- f. where applicable, the fact that the data controller intends to transfer personal data to a third country or international organisation.

Furthermore, the Data Controller must additionally provide information on:

- a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;

- b. the existence of the right to request from the data controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject, and to object to processing of personal data, as well as the right to data portability;
- c. where the processing is based on point (a) of Article 6(1) (data subject's consent) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- d. the right to lodge a complaint with a supervisory authority;
- e. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
- f. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. The Data Controller does not carry out such activities.

If the data controller intends to process personal data for a purpose other than that for which they were collected, the data controller shall provide the data subject, prior to that further processing, with information on that other purpose and with any relevant further information as mentioned above.

Additionally, the Data Controller is obliged to provide information:

- a) about the circumstances, effects, and measures taken to remedy a data protection incident (Article 34);
- b) in the case of data transfer to recipients, about the legal basis, purpose, and recipient of the data transfer.

Right of access to personal data: Article 15 of the GDPR

The data subject has the right to obtain from the data controller confirmation as to whether or not personal data concerning him or her are being processed, and if that is the case, the right of access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- e) the existence of the right to request from the data controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject, and to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Upon the data subject's request, the Data Controller shall provide a copy of the personal data undergoing processing to the data subject, free of charge, via electronic means or by post, as requested. In case of repeated requests for the same subject matter, the Data Controller has the right to charge a reasonable fee or refuse to act on the request. The right of access can be exercised in writing via the contact details provided in Section II, or verbally following verification of identity.

Right to Rectification: Article 16 of the GDPR

The data subject has the right to obtain from the data controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement. If the data necessary for rectification are available to the Data Controller, the Data Controller will perform the rectification automatically, even without a specific request to that effect.

Right to Erasure: Article 17 of the GDPR

The data subject has the right to obtain from the data controller the erasure of personal data concerning him or her without undue delay, and the data controller is obliged to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

However, the right to erasure is not absolute and shall not apply to the extent that processing is necessary:

g) for exercising the right of freedom of expression and information;

h) for compliance with a legal obligation which requires processing by Union or Member State law to which the data controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;

i) for reasons of public interest in the area of public health;

j) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;

k) for the establishment, exercise or defence of legal claims.

Therefore, the right to erasure is not absolute, which in the context of the webshop essentially implies the following limitations:

For data processing activities where the legal basis for processing is compliance with a legal obligation (e.g., issuing an invoice certifying payment for a purchased product), the storage period is eight years according to Section 169(2) of the Accounting Act.

Such limitations naturally do not apply to data processing based on the data subject's voluntary consent; erasure in these cases does not face obstacles.

If the Data Controller rejects a request for erasure, it will always provide a written, reasoned response

Right to Restriction of Processing: Article 18 of the GDPR

The data subject has the right to obtain from the data controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, in which case processing shall be restricted for a period enabling the data controller to verify the accuracy of the personal data;

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) the data controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or

d) the data subject has objected to processing; in this case, processing shall be restricted pending the verification whether the legitimate grounds of the data controller override those of the data subject.

Right to Data Portability: Article 20 of the GDPR

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a data controller, in a structured, commonly used and machine-readable format and

have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided, where the processing is based on consent and is carried out by automated means.

However, the exercise of this right shall not adversely affect the rights and freedoms of others and must not infringe upon the right to erasure.

Right to Object: Article 21 of the GDPR

The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on:

- a) the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller (point (e) of Article 6(1) of the GDPR); or
- b) the legitimate interests pursued by the data controller or by a third party (point (f) of Article 6(1) of the GDPR), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. If the data subject objects to processing for direct marketing purposes, the Data Controller shall no longer process the personal data for such purposes.

Right to Withdraw Consent: Article 7 of the GDPR

The data subject has the right to withdraw his or her voluntarily given consent at any time. For example, in the case of subscribing to a newsletter or marketing messages. Naturally, the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. The data subject must be informed of this right before giving consent. This is explicitly indicated in all cases listed under Section V among the data processing activities where the legal basis is voluntary consent.

Automated decision-making in individual cases, including profiling: Article 22 of the GDPR

(The Data Controller does not carry out this type of data processing; this section is included for the sake of completeness only.)

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

This right shall not apply if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- b) is authorised by Union or Member State law to which the data controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or

c) is based on the data subject's explicit consent.

Under the GDPR, 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Assertion of rights related to personal data after the death of the data subject: Section 25 of the Info Act

In the case of data processing falling under the scope of the GDPR, within five years following the death of the data subject, the rights of access, rectification, erasure, restriction of processing, and the right to object, which belonged to the deceased during their lifetime, may be exercised by a person authorised by a declaration made by the data subject in a public document or a private document of full probative value, deposited with the data controller.

In the case of data processing not falling under the scope of the GDPR, the rights that can be exercised are the right of access, the right to rectification, the right to erasure, and the right to restriction of processing.

If the data subject has not made a declaration as described above, their relative as defined by the Civil Code shall be entitled to exercise certain rights regarding both data processing falling under the GDPR and data processing not falling under it, within five years following the data subject's death, even in the absence of such a declaration. The relative who first exercises this entitlement is the one authorised to assert the data subject's rights.

X. LEGAL REMEDIES

As a guarantee for the enforcement of the data subject's rights, the Data Controller shall examine any request submitted by the data subject within the shortest possible time from its submission, but no later than within 30 days, shall make a decision on its merits, and shall inform the applicant of its decision free of charge, in writing (via electronic means if the request was also submitted that way).

If the Business or the data subject natural person has any questions or requests regarding our processing of the provided personal data, please contact our Company with confidence directly at the contact details provided in Section II when exercising your rights to information, access, rectification, restriction, erasure, withdrawal of consent, or objection.

If we uphold your request, we, or the recipient/data processor acting on our mandate or according to our instructions, will rectify, erase, or restrict the processing of the personal data. If the request is upheld, we will also notify those recipients to whom the data was disclosed prior to this measure, so that they may implement the rectification, erasure, or restriction of processing in relation to their own data processing.

If we were to reject your request, we will inform you of this in writing without delay, stating the legal and factual reasons for the rejection alongside the fact of the refusal, and informing you of your relevant rights.

In case your request is rejected, you have the following legal remedies available:

1. You may initiate an investigation by the Authority, citing that an infringement of rights related to the processing of personal data has occurred or is imminently threatened.

2. You may request the Authority to conduct an data protection authority procedure if, in your judgment, the data controller or the data processor acting on its mandate or instructions has violated the provisions stipulated by law or a binding legal act of the European Union regarding the processing of your personal data during their processing.
3. The data subject may also turn to a court if, in their judgment, the data controller or the data processor acting on its mandate or instructions processes their personal data in violation of the provisions stipulated by law or a binding legal act of the European Union regarding the processing of personal data. The data subject may, at their choice, initiate the lawsuit at the court competent according to their place of residence or stay.

If the court upholds the claim, it establishes the fact of the infringement and obliges the Data Controller and/or the data processor acting on its mandate:

- a) to terminate the unlawful data processing operation,
 - b) to restore the lawfulness of the data processing, and
 - c) to take precisely defined actions to ensure the enforcement of the affected person's rights, and,
- if necessary, will also rule on the claim for compensation and non-material damages.

Any person who has suffered material or non-material damage as a result of an infringement of the GDPR shall have the right to receive compensation from the data controller or the data processor for the damage suffered.

All data controllers involved in the processing are liable for any damage caused by processing that infringes the GDPR. A data processor shall be liable for the damage caused by processing only if it has not complied with obligations under the GDPR specifically directed to processors or if it has acted outside of or contrary to lawful instructions from the data controller.

The data controller or the data processor shall be exempt from liability if it proves that it is in no way responsible for the event causing the damage.

Contact details of the National Authority for Data Protection and Freedom of Information:

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