

# Semil 34 Kft IMA Technology

Privacy Policy

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## **The purpose of the data management information**

Semil 34 Kft. hereafter as a service provider, as a data controller, acknowledges the content of this legal notice as binding on itself. It undertakes to ensure that all data management related to its activities meets the requirements set out in these regulations and in the applicable national legislation, as well as in the legal acts of the European Union.

The data protection guidelines arising in connection with the data management of Semil 34 Kft. are continuously available at [www.ima-water.com](http://www.ima-water.com)

Semil 34 Kft. reserves the right to change this information at any time.

Amendments to the prospectus will take effect upon publication at the above address. Semil 34 Kft. is committed to protecting the personal data of its customers and partners, and considers it of utmost importance to respect its customers' right to self-determination of information. Semil 34 Kft. treats personal data confidentially and takes all security, technical and organizational measures that guarantee data security.

### **1. Data of the data controller:**

Name: Semil 34 Kft.

Headquarters: 1111 Budapest, Lágymányosi utca 12. fszt. 2.

Tax number: 32051177-2-43

Company registration number: 29257988-2-42

Email address: [info@ima-water.com](mailto:info@ima-water.com)

Phone number: +36709056606

### **2. Data management**

#### **2.1 Website contact form**

The fact of the data collection, the scope of the managed data and the purpose of the data management:

- Name - contact (legitimate interest)
- E-mail address - contact (legitimate interest)
- Telephone number - contact (legitimate interest)

Scope of stakeholders: All stakeholders who fill out the contact form on the website.

Duration of data management, data deletion deadline: 24 months

#### **2.2 Order**

The fact of the data collection, the scope of the processed data and the purpose of the data management:

- Name - order form, invoice issuance
- E-mail address - contact
- Phone number - contact
- Billing address - order form, invoice issuance
- ▪ Scope of stakeholders: All stakeholders who order the service.
- ▪ Duration of data management, deadline for deletion of data: Accounting

documents

the deadline for cancellation is 8 years based on § 169 (2) of Act C of 2000 on accounting.

#### **2.3 Cookies**

##### **It's the job of cookies**

- collect information about visitors and their devices;
- remember the individual settings of the visitors, which will be used
- facilitate the use of the website;
- provide a quality user experience. In order to provide customized service a small data package on the user's computer, so-called it places a cookie and reads it back during the next visit. If the browser returns a previously saved cookie, the cookie management service provider has the opportunity to connect the user's current visit with previous ones, but only with regard to its own content. Session cookies are absolutely necessary

### **Session cookies are absolutely necessary**

The purpose of these cookies is to enable visitors to fully and smoothly browse the www.mywood.hu website, use its functions and the services available there. The validity period of this type of cookie lasts until the end of the session (browsing), when the browser is closed, this type of cookie is automatically deleted from the computer or other device used for browsing.

### **Cookies placed by third parties (analytics)**

The website www.ima-water.com uses Google Analytics as a third-party cookie. By using the statistical service Google Analytics, Semil 34 Kft. collects information about how visitors use the website. The data is used for the purpose of developing the website and improving the user experience. These cookies also remain on the visitor's computer or other device used for browsing, in their browser, until they expire, or until the visitor deletes them.

User and event data collected by Google Analytics is retained for 24 months

## **3. Data processors used**

### **3.1 Storage provider**

Activity provided by data processor: Storage service

Name and contact information of data processor:

- Name: OVH Group SA
- Headquarters: France, 2 Rue Kellermann, Roubaix, Aquitaine, 59100
- Phone number: + 33 141 798000

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

Scope of stakeholders: All stakeholders who use the website.

Purpose of data management: Making the website available and operating it properly.

Duration of data management, deadline for data deletion: The data manager and storage until the termination of the agreement between the service provider or the data subject to the hosting provider data management lasts until the deletion request is made.

Legal basis for data processing: User's consent, Infotv. § 5, paragraph (1), 6.

Article (1) point a) and CVIII of 2001 on certain issues of services related to the information society. Act 13/A. (3) of §

### **3.2 Website technical supervision**

Activity provided by data processor: Website technical supervision

Name and contact information of data processor:

- Name: Alfa 7
- Headquarters: 1075 Budapest, Rumbach Sebestyén u 10, 1 em 11 a.
- Phone number: +36 709056606
- Email address: info@alfa7.eu

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

Scope of stakeholders: All stakeholders who use the website.

Purpose of data management: Making the website available and operating it properly.

Duration of data management, deadline for data deletion: The data manager and storage until the termination of the agreement between the service provider or the data subject to the hosting provider data management lasts until the deletion request is made.

Legal basis for data processing: User's consent, Infotv. § 5, paragraph (1), 6. Article (1) point a) and CVIII of 2001 on certain issues of services related to the information society. Act 13/A. (3) of § 3.3 Social Sites.

The fact of the data collection, the scope of the processed data: the name registered on the social networking site Facebook, and the public profile picture of the user.

cope of stakeholders: All stakeholders who registered on the Facebook social network and "liked" the website.

## **4. Rights of data subjects**

### **4.1 Right of access**

The data subject has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data processing is underway, he is entitled to access the personal data and the information listed in the regulation.

### **4.2 Right to rectification**

The data subject has the right to have inaccurate personal data corrected without undue delay at the request of the data controller. Taking into account the purpose of data management, you are entitled to request the completion of incomplete personal data, including by way of a supplementary statement.

### **4.3 Right to erasure**

The data subject has the right to request that the data controller delete the personal data concerning him without undue delay, and the data controller is obliged to delete the personal data concerning the data subject without undue delay under certain conditions.

### **4.4 The right to be forgotten**

If the data controller has disclosed the personal data and is obliged to delete it, taking into account the available technology and the costs of implementation, it will take the reasonably expected steps - including technical measures - in order to inform the data controllers handling the data that the data subject has requested the personal data in question deleting links to data or copies or duplicates of these personal data.

### **4.5 Right to restriction of data processing**

The data subject has the right to request that the data controller restricts data processing if one of the following conditions is met:

- the data subject disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the data controller to check the accuracy of the personal data;
- the data management is illegal and the data subject opposes the deletion of the data and instead requests the restriction of their use;
- the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to present, enforce or defend legal claims;
- the data subject objected to data processing; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

#### **4.6 Right to data portability**

The data subject has the right to receive the personal data concerning him/her provided to a data controller in a segmented, widely used, machine-readable format, and is entitled to transfer these data to another data manager without being hindered by the data manager to whom the personal data was made available.

#### **4.7 Right to protest**

The data subject has the right to object at any time for reasons related to his own situation to the processing of his personal data necessary for the performance of a task carried out in the public interest or within the framework of the exercise of public authority granted to the data controller, or the processing necessary to enforce the legitimate interests of the data controller or a third party, including profiling based on the aforementioned provisions too. In the event of a protest, the data controller may no longer process the personal data, unless it is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are related to the presentation, enforcement or defense of legal claims.

#### **4.8 Automated decision-making in individual cases, including profiling**

The data subject has the right not to be covered by the scope of a decision based solely on automated data management, including profiling, which would have a legal effect on him or affect him to a similar extent.

### **5. Action deadline**

The data controller expected the receipt of the request without undue delay, but in any case

Within 1 month, it informs the person concerned about the measures taken following the above requests.

If necessary, this can be extended by 2 months. The data controller shall inform the data subject of the extension of the deadline, indicating the reasons for the delay, within 1 month of receiving the request.

If the data controller does not take measures following the data subject's request, it shall inform the data subject without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action, as well as of the fact that the data subject may file a complaint with a supervisory authority and exercise his right to judicial redress.

### **6. Security of data management**

The data manager and the data processor implement appropriate technical and organizational measures, taking into account the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of data management, as well as the variable probability and severity of the risk to the rights and freedoms of natural persons. , to guarantee a level of data security appropriate to the degree of risk.

## **7. Other provisions**

- We provide information on data management not listed in this information when the data is collected.
- The Service Provider is obliged to provide information, communicate and transfer data in response to an exceptional request from the authorities, or in the event of a request from other bodies based on the authorization of the law, or to provide documents.
- In these cases, the Service Provider provides the requester with the exact purpose and data has indicated its scope - personal data is disclosed only to the extent and to the extent that is absolutely necessary to achieve the purpose of the request.

## **8. Data protection incident management**

### **8.1 Informing the data subject about the data protection incident**

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

In the information provided to the data subject, the nature of the data protection incident must be clearly and comprehensibly described, and the name and contact information of the data protection officer or other contact person providing additional information must be provided; the likely consequences of the data protection incident must be described; the measures taken or planned by the data controller to remedy the data protection incident must be described, including, where applicable, measures aimed at mitigating any adverse consequences resulting from the data protection incident.

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

- the data 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 - that make them unintelligible to persons not authorized to access personal data the data;
- after the data protection incident, the data controller has taken additional measures to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialize in the future;
- providing information would require a disproportionate effort. In such cases, the data subjects must be informed through publicly published information, or a similar measure must be taken that ensures similarly effective information to the data subjects.
- If the data controller has not yet notified the data subject of the data protection incident, the supervisory authority, after considering whether the data protection incident is likely to involve a high risk, may order the data subject to be informed.

### **8.2 Reporting a data protection incident to the authority**

The data controller shall report the data protection incident to the competent supervisory authority pursuant to 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 likely to pose no risk to the rights of natural persons and freedoms. If the notification is not made within 72 hours, the reasons justifying the delay must also be attached.

## **9. Possibility of lodging a complaint**

The National Data Protection and Freedom of Information will file a complaint against a potential violation of the data controller

You can live with an authority:

National Data Protection and Freedom of Information Authority

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, PO Box: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## **10. Closing remarks**

During the preparation of the information sheet, we paid attention to the following legislation:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, as well as on the repeal of Regulation 95/46/EC (General Data Protection Regulation) (2016 April 27)
- CXII of 2011 Act - on the right to self-determination of information and freedom of information (hereinafter: Infotv.)
- CVIII of 2001 Act - on certain issues of electronic commercial services and services related to the information society (mainly § 13/A)
- XLVII of 2008 law - on the prohibition of unfair commercial practices towards consumers;
- XLVIII of 2008 Act - on the basic conditions and certain limitations of economic advertising (especially § 6.a)
- 2005 XC. Act on Electronic Freedom of Information
- Act C of 2003 on electronic communications (specifically § 155.a)
- 16/2011. s. opinion on best practices for behavioral online advertising About EASA/IAB recommendation
- Prior information is recommended by the National Data Protection and Freedom of Information Authority on its data protection requirements
- Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the natural on the protection of persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Regulation 95/46/EC.