

Popz.com

# Privacy policy

## INTRODUCTION

The **POPZ Europe Kft.** (Registered seat: H-4002 Debrecen, Kígyóhagyma utca 3., VAT number: 12413650-2-09) (hereinafter referred to as: Service provider, Data controller) shall be subject to the following policy.

Pursuant to the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we give the following notification.

This privacy policy regulates the data handling of the following websites:  
<https://popz.com>

The privacy policy is available from the site: <http://popz.com/privacy-policy>

The modification of the policy shall enter into force by its publication in the website above.

## NAME AND CONTACTS OF THE DATA CONTROLLER:

Name: POPZ Europe Kft.

Registered seat: H-4002 Debrecen, Kígyóhagyma utca 3.,

E-mail: [info@popz.eu](mailto:info@popz.eu)

Telephone: +36 52 500 388

## DEFINITIONS

1. 'personal data' means 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;
2. 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. 'controller' means the 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;
4. 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
5. 'recipient' means 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;
6. 'consent' of the data subject means 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;
7. 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

## PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner being incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with the paragraph (1) of the Article 89, not be considered to be incompatible with the initial purposes ('purpose limitation');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- e) kept 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 longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the paragraph (1) of the Article 89 subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

The data controller shall be responsible for, and be able to demonstrate compliance with the ones above ('accountability').

**DATA PROCESSING****MESSAGE, CONTACT, REQUEST FOR QUOTATION**

1. The fact of data collection, scope of the processed data and the aim of data processing:

<b>Personal data</b>	<b>Aim of data processing</b>
Name, E-mail address.	Contact, identification.
Time and date of the message	Performance of technical operation
The IP address the message was sent from	Performance of technical operation

2. Scope of data subjects: Any data subjects sending message, inquiring or requesting a quotation in the website.

3. Period of the data processing, deadline of the erasure of the data: Data processing shall be performed until the closure of the case.

4. Possible data controllers entitled to get to know the data: The personal data shall be treated by an employee authorised by the data controller, by considering the principles above.

**5. Description of the rights of the data subjects regarding data processing:**

- The data subject may request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and
- may object to processing of these personal data and
- the data subject shall have the right to data portability and to withdraw his/her consent any time.

6. The data subject may request the erasure or the modification of the personal data:

- via post to the address H-4002 Debrecen Kígyóhagyma utca 3.
- via e-mail to the e-mail address info@popz.eu
- via phone to the phone number +36 52 500 388

7. Legal basis of the data processing: the consent of the data subject, item a) of the paragraph (1) of the article 6, paragraph (1) of the section 5 of the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

8. Hereby we notify you that

- **data processing shall be based on your consent.**
- **you shall** give your personal data to let us reply your message.
- the lack of data supply has a **consequence** that we are unable to comply with your request.



## THE DATA PROCESSORS APPLIED

### Hosting provider

1. Activity performed by the data processor: Hosting and server services
2. Name and contacts of the data processor:  
HostGator.com, LLC  
Attn: Legal Department  
5005 Mitchelldale, Suite #100  
Houston, Texas 77092  
E-mail: [privacy@hostgator.com](mailto:privacy@hostgator.com)
3. The fact of data processing scope of the processed data: All personal data given by the data subject.
4. Scope of data subjects: All data subjects using the website
5. Aim of data processing: Availability and the appropriate operation of the website.
6. Period of the data processing, deadline of the erasure of the data: Data processing takes place until the termination of the agreement between the data controller and the hosting provider or until the erasure request of the data subject to the hosting provider.
7. The legal basis of the data processing: the consent of the user, as described in the paragraph (1) of the section 5 of the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, the item a) of the paragraph (1) of the article 6, and the paragraph (3) of the section 13/A of the Act CVIII of 2001 on certain aspects of electronic commerce and information society services.

## HANDLING OF COOKIES

1. The fact of data processing scope of the processed data: Unique identifier, dates, times
2. Scope of data subjects: All data subjects visiting the website
3. Aim of data processing: Identification of the users and the tracing of the visitors
4. Period of the data processing, deadline of the erasure of the data:

Cookie type	Legal basis of the data processing	Period of the data processing	Processed scope of data
Session cookies	paragraph (3) of the section 13/A of the Act CVIII of 2001 on certain aspects of electronic commerce and information society services.	The period until the closure of the related visiting session	connect.sid

In case of hotjar, data processing takes place until 365 days and in case of Facebook pixel, erasure takes place after 180 days.

5. Possible data controllers entitled to get to know the data: The data controller does not process personal data by using the cookies.
6. Description of the rights of the data subjects regarding data processing: The data subject have the possibility to delete the cookies in the Tools/Setup menu of the browsers, usually among the settings of the Data protection.
7. Legal basis of the data processing There is no need for the consent of the data subject, if the exclusive aim of the use of the cookies is the transmission of communications via electronic communication system or if the use of the cookies is absolutely necessary for the service provider to provide services explicitly requested by the subscriber or the user, regarding the information society.

## OTHER COOKIES

8. The data controller uses the remarketing code of the Facebook. As regards, we give the following notification: cookie lifetime: 20 days; aim of data processing: Personalisation of Facebook advertisements; further information: <http://facebook.com/help/cookies/>
9. The data controller uses the service of the HotJar, which is a service used for heat map analytics and collects data about the position of the clicks and the movement of the mouse. Detailed information: <https://www.hotjar.com/cookies>



**NEWSLETTER, DIRECT MARKETING ACTIVITY**

1. Pursuant to the section 6 of the Act XLVIII of 2008 on the Essential Conditions and Certain Limitations of Business Advertising Activity, the User may give his/her prior and explicit consent to let the service provider contact him/her with its advertisement offers and other consignments via his/her contact data given upon registration.
2. Furthermore, by keeping an eye at the stipulations hereof, the Client may contribute to the processing of his/her personal data necessary for the delivery of advertisement offers by the Service provider.
3. The Service provider does not send unsolicited advertising material and it is free of charge for the User to unsubscribe from the delivery of offers without restriction and justification. In this case, the Service provider shall erase all personal data (necessary for the delivery of advertisements) of the User from its registry and may not contact the User with its further offers. The User may unsubscribe from the advertisements by clicking the link in the e-mail.
4. The fact of data collection, scope of the processed data and the aim of data processing:

<b>Personal data</b>	<b>Aim of data processing</b>
Name, E-mail address.	Identification, making possible the subscription to the newsletter.
Time of subscription	Performance of technical operation
The IP address upon subscription	Performance of technical operation

5. Scope of data subjects: All data subjects having subscribed to the newsletter.
6. The aim of the data processing: sending electronic messages (e-mail, SMS, push message) containing advertisement to the data subject, provision of notification on actual information, products, promotions, new functions etc.
7. Period of the data processing, deadline of the erasure of the data: data processing takes place until the withdrawal of the consent, i.e. until the cancellation of subscription.
8. Possible data controllers entitled to get to know the data, the recipients of the personal data: The personal data may be treated by the sales and marketing staff of the data controller, by considering the principles above.
9. **Description of the rights of the data subjects regarding data processing:**
  - The data subject may request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and
  - may object to processing of these personal data and

- The data subject shall have the right to data portability and to withdraw his/her consent any time.

**10. The access to personal data and their erasure, modification or the limitation of their processing, the portability of data and the claim against data processing may be initiated by the data subject via the contacts below:**

- Via post to the address H-4002 Debrecen Kígyóhagyma utca 3.
- via e-mail to the e-mail address info@popz.eu
- via phone to the phone number +36 52 500 388

**11. The data subject may any time **unsubscribe** from the newsletter **free of charge**.**

**12. Legal basis of the data processing: the consent of the data subject, the item a) of the paragraph (1) of the article 6, the paragraph (1) of the section 5 of the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the paragraph (5) of the section 6 of the Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.**

*The advertiser, the advertising service provider and the publisher of the advertisement shall keep record about the personal data of the people having made a declaration on their consent, in the scope determined in the consent. Any data - on the recipient of the advertisement - in this record shall be processed until the withdrawal of the consent, only according to the declaration on consent and may be delivered to a third party only with the prior consent of the data subject.*

**13. Hereby we notify you that**

- **data processing shall be based on your consent.**
- you **have to** give your personal data, if you want to receive newsletter from us.
- the lack of data supply has a **consequence** that we are unable to send newsletter to you.

### SOCIAL NETWORKING SITES

1. The fact of data processing scope of the processed data: The name of the person having registered at the social networking sites, such as Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. and his/her public profile picture.
2. Scope of data subjects: Any data subject having registered at the social networking sites, such as Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. and liked the website.
3. Aim of the data collection: Sharing, liking and popularisation of the website itself or certain content elements, products, promotions of it via the social networking sites.
4. Period of the data processing, deadline of the erasure of the data, possible data controllers entitled to get to know the data and the notification of the data subjects regarding their rights on data processing: The data subject may get information in the given social networking site about the sources, the processing of the data and about the way and the legal basis of the delivery of the data. Data processing takes place in the social networking sites, therefore, the period and the way of the data processing and the erasure and modification possibilities of the data shall be governed by the regulations of the given social networking site.
5. Legal basis of the data processing: the voluntary consent of the data subject to the processing of his/her personal data in the social networking site.

## APPLICATION OF THE GOOGLE ANALYTICS

1. This website uses the Google Analytics application, which is the web analytics service of the Google Inc. (Google). The Google Analytics uses the so-called cookies, text files, which are saved to the computer and they facilitate the analysis of the use of the website visited by the User.
2. The information generated with the cookies regarding the website used by the User are usually sent to and stored on one of the Google servers in the USA. With the website activation of IP-anonymisation, the Google previously shortens the IP address of the User within the member states of the European Union or in other countries involved in the Agreement on the European Economic Area.
3. The full IP addresses are delivered to and shortened in the Google servers in the USA only in exceptional cases. On commission from the operator of the website, the Google will use these data to evaluate how the user used the website, to make reports to the operator of the website regarding the activity of the website and to perform further services regarding the use of the website and the internet.
4. Within the framework of the Google Analytics, the Google does not compare the IP address forwarded by the browser of the User with the other data of the Google. The User may prevent the storage of cookies by the appropriate settings of his/her browser, however, we call your attention that in this case it might occur that not all functions of this website will be fully operational. Furthermore, the User may prevent the Google to collect and process the website use data of the user, as collected by the cookies (including the IP address), if he/she downloads and installs the browser plugin available at: <https://tools.google.com/dlpage/gaoptout?hl=hu>

### CUSTOMER RELATIONSHIPS AND OTHER DATA PROCESSING

1. If the data subject has any questions during the use of our data processing services or he/she has any problems, he/she may contact the data controller via the contact data in the website (phone, e-mail, social networking sites etc.).
2. The e-mails, messages and the data, including the name and the e-mail address of the inquiring person, given via Facebook etc., together with his/her other voluntarily delivered personal data will be erased by the data controller within 2 years from the data publication at the latest.
3. About any data processing not listed herein, notification is given upon the entry of the data.
4. In case of the exceptional call of authorities or in case of the call of other bodies authorised by law, the Service provider shall issue information, disclose or deliver data or documents to such authorities or bodies.
5. In these cases, if the authorities and bodies above indicated the exact aim and the scope of the data, the Service provider shall issue personal data in an amount and extent strictly necessary for the achievement of the aims of such call.

## **RIGHTS OF THE DATA SUBJECTS**

### **1. Right of access**

You shall have the right to obtain from the data controller confirmation as to whether or not the personal data concerning you are being processed, and, where that is the case, you shall have the right to have access to the personal data and the information stipulated by the regulation.

### **2. Right to rectification**

You shall have the right to obtain from the controller without undue delay the rectification of your inaccurate personal data. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **3. Right to erasure**

You shall have the right to obtain from the controller the erasure of the personal data concerning you without undue delay and the controller shall have the obligation to erase the personal data concerning you without undue delay among the set circumstances.

### **4. Right to be forgotten**

If the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform the data controllers which are processing the personal data that you requested the erasure of any links to, or copy or replication of, those personal data.

### **5. Right to restriction of processing**

You shall have the right to obtain from the controller restriction of processing where one of the following applies:

- You contest the accuracy of the personal data, in this case, restriction refers to a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but you require these data for the establishment, exercise or defence of legal claims;
- You objected to processing; in this case the restriction refers to the period until it is verified whether the legitimate grounds of the controller override your ones.

### **6. Right to data portability**

You shall have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format

and you shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (...)

## 7. Right to object

You shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including profiling based on those provisions.

## 8. Objection against direct marketing

Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to the processing of the personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

## 9. Automated individual decision-making, including profiling

You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

The previous paragraph shall not apply, if the decision:

- is necessary for entering into, or performance of, a contract between you and the data controller;
- is authorised by European Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

### DEADLINE OF MEASURES

The data controller shall notify you without undue delay, but **within 1 month** after the receipt of the request by all means, about the measures taken concerning the requests above.

If necessary, this deadline **may be prolonged by further 2 months**. The data controller shall notify you **within 1 month** after the receipt of the request about the prolongation of the deadline, by indicating the reasons of the delay.

If the data controller fails to take measures regarding your request, the data controller shall notify you without undue delay, but **within 1 month** after the receipt of the request at the latest about the reasons of the omission of the measure and about that you are eligible to submit a claim to a supervisory authority and you may exercise your right to judicial remedy.

### SECURITY OF DATA PROCESSING

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the data controller and the data processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of systems and services used for the processing of personal data;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

#### COMMUNICATION OF A PERSONAL DATA BREACH TO THE DATA SUBJECT

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

The communication to the data subject shall describe in clear and plain language the nature of the personal data breach and the name and contact details of the data protection officer or other contact point where more information can be obtained; shall describe the likely consequences of the personal data breach; and shall describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject shall not be required if any of the following conditions are met:

- the data controller **has implemented appropriate technical and organisational protection measures**, and those measures were applied to the personal data affected by the personal data breach, in particular those that **render the personal data unintelligible** to any person who is not authorised to access it, such as encryption;
- the data controller has taken subsequent measures which **ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise**;
- the notification **would involve disproportionate effort**. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so.

#### NOTIFICATION OF A PERSONAL DATA BREACH TO THE AUTHORITY



In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

### **POSSIBILITY OF COMPLAINTS**

In case of an incidental violation of law by the data controller, a complaint may be lodged to the Hungarian National Authority for Data Protection and Freedom of Information:

Hungarian National Authority for Data Protection and Freedom of Information  
H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.  
Correspondence address: H-1530 Budapest, P.O. Box: 5.  
Telephone: +36 -1-391-1400  
Fax: +36-1-391-1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## AFTERWORD

During making this privacy policy, the following regulations were considered

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information;
- Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Service (especially the section 13/A thereof);
- Act XLVII of 2008 on the Prohibition of Unfair Business-to-Consumer Commercial Practices;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (especially the section 6 thereof)
- Act XC of 2005 on the Freedom of Information by Electronic Means;
- Act C of 2003 on Electronic Communications (especially the section 155 thereof)
- Opinion 16/2011 on EASA/IAB Best Practice Recommendation on Online

### Behavioural Advertising

- Recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements of the prior notification
- Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)