

# Privacy Policy

## Privacy Policy

### Data Controller

**Name:** Veronic Metal Power Kft.

**Headquarters:** 2600 Vác, Alsó törökhegy út 18. - Hungary

**Address, complaint handling:** 2600 Vác, Alsó törökhegy út 18. - Hungary

**E-mail:**

**Phone number:** 06309429691

**Website:** <https://www.sinb.de/>

### Hosting service provider

**Name:** UNAS Online Kft.

**Address:** 9400 Sopron, Kőszegi út 14.

**E-mail address:** unas@unas.hu

**Phone number:**

## Description of data processing performed during the operation of the website

### Information about cookies

#### *What is a cookie?*

The Data Controller uses so-called cookies during visits to the website. A cookie is a package of alphanumeric information sent by our website to your browser in order to save some settings, make the use of the website easier, and helps to collect some relevant information about our visitors for statistical purposes.

Some cookies do not contain personal information and are not suitable for identifying an individual user, but some contain a unique identifier - a secret, randomly generated series of numbers - that is stored by your device, thus ensuring your identification. The period of operation of each cookie is described in the relevant description of each cookie.

#### **Legal background and legal basis of cookies:**

The legal basis for data processing under Article 6 (1) (a) of the Decree is your consent.

#### **The main features of the cookies used by the website are:**

**Session cookies:** These cookies store the visitor's location, browser language, payment currency, their lifetime is limited to maximum 2 hours or until the browser is closed.

**Mature content cookies:** These cookies are a confirmation of the age-restricted content and state that the person concerned is over 18 years of age. They expire when the browser is closed.

**Referrer cookies:** They record what outside website the visitor arrived to the website from. They expire when the browser is closed.

**Last viewed product cookie:** Records the products that the visitor last viewed. They expire in 60 days.

**Last viewed category cookie:** Records the last viewed category. They expire in 60 days.

**Recommended products cookie:** The "recommend to a friend" function records the list of products you want to recommend. They expire in 60 days.

**Mobile version, design cookies:** Detects the device used by the visitor and switches to full view on mobile. They expire in 365 days.

**Cookie acceptance cookie:** When you arrive at the site, you accept the statement about the storage of cookies in the warning window. They expire in 365 days.

**Shopping cart cookie:** Records the products placed in the shopping cart. They expire in 365 days.

**Intelligent offer cookie:** It records criteria for displaying smart offers (for example, did the visitor visit the site yet, does he/she have an order). They expire in 30 days.

**Logout #2 cookie:** It logs the user out after 90 days according to option #2. They expire in 90 days.

**Backend ID cookie:** It is the ID of the backend server for the website. They expire when the browser is closed.

**Google Adwords cookie** When someone visits our site, the visitor's cookie ID is added to the remarketing list. Google uses cookies, such as NID and SID cookies, to customize the ads that appear in Google products, such as Google Search. For example, it uses such cookies to remember your recent searches, past interactions with individual advertisers' ads or search results, and visits to advertiser websites. AdWords Conversion Tracking uses cookies. It tracks cookies on a user's computer to track sales and other conversions resulting from an ad when that person clicks on an ad. Here are some common ways to use cookies: selecting ads based on what's relevant to that user, improving campaign performance reports, and avoiding ads that the user has already viewed.

**Google Analytics cookie:** Google Analytics is Google's analytics tool that helps website and application owners gain a more accurate picture of their visitors' activities. The Service may use cookies to collect information and report statistics about the use of the Website without individually identifying visitors to Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reports based on site usage statistics, Google Analytics, along with some of the advertising cookies described, can also be used to display more relevant ads on Google products (such as Google Search) and across the web.

**Remarketing cookies:** They can appear for past visitors or users on other Google Display Network websites, or when they search for products or services with search words relevant to the services

**Cookies essential for operation:** These cookies are essential for the use of the website and allow you to use the basic functions of the website. Without these, many features of the site will not be available to you. These types of cookies expire when the browsing session ends.

**Cookies to improve the user experience:** These cookies collect information about the user's use of the website, such as which pages you visit most often or what error message you receive from the website. These cookies do not collect information that identifies the visitor, i.e. they work with completely general, anonymous information. The data obtained from these is used to improve the performance of the website. These types of cookies expire when the browsing session ends.

If you do not accept the use of cookies, some functions will not be available to you. You can find more information on deleting cookies on the links below:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

- Mozilla: <https://support.mozilla.org/hu/kb/weboldalal-atal-elhelyezett-sutik-torlese-szamito>
- Safari: [https://support.apple.com/kb/ph21411?locale=en\\_US](https://support.apple.com/kb/ph21411?locale=en_US)
- Chrome: <https://support.google.com/chrome/answer/95647>

## **Processed Data for Conclusion and Fulfilment of Contracts**

There are a number of data processing cases for the conclusion and fulfilment of contracts. Please be informed that data processing related to complaint handling and warranty administration will only take place if you exercise one of these rights.

If you do not make a purchase through the webshop, and you are only a visitor of the webshop, the information described in the section about data management for marketing purposes may apply to you, if you give us a consent for marketing purposes.

Data processing for the conclusion and performance of contracts in more detail:

### **Contact**

For example, if you have questions about a product via email, contact form or phone.

Preliminary contact is not required, you can order from the webshop at any time.

### **Processed data**

Data provided by you when contacting us.

### **Duration of data processing**

Data is processed until the end of the contact.

### **The legal basis for data processing**

Your voluntary consent to the Data Controller provided during contact. [Data processing pursuant to Article 6 (1) (a) of the Regulation]

### **Registration on the website**

By storing the data provided during registration, the Data Controller can provide a more convenient service (e.g. the data of the data subject does not have to be re-entered when purchasing again). Registration is not a condition for concluding a contact

### **Processed data**

During data processing, the Data Controller processes your name, address, phone number, e-mail address, product characteristics and the date of the purchase.

### **Duration of data processing**

Until your consent is withdrawn.

### **The legal basis for data processing**

Your voluntary consent to the Data Controller during registration. [Data processing under Article 6 (1) (a) of the Regulation]

### **Processing your order**

Data processing activities are required to complete the contract during processing orders

### **Processed data**

During data processing, the Data Controller processes your name, address, phone number, e-mail address, product characteristics and the date of the purchase.

If you have placed an order in the webshop, data processing and data entry are essential to fulfil the contract.

### **Duration of data processing**

Data is processed for 5 years according to the civil law limitation period.

### **The legal basis for data processing**

Performance of the contract. [Data processing pursuant to Article 6 (1) (b) of the Regulation]

### **Invoicing**

Data processing is performed in order to issue a statutory invoice and to fulfil the obligation to keep accounting documents. According to Paragraph (1) to (2) of Section 169 of the Act on Accounting, companies must keep accounting documents in support of their accounting, either directly or indirectly.

### **Processed data**

Name, address, e-mail address, phone number.

### **Duration of data processing**

Issued invoices must be kept for 8 years from the date of invoicing in accordance with Section 169 (2) of the Act on Accounting.

### **The legal basis for data processing**

According to Article (1) of Paragraph 159 of Act CXXVII of 2007 on Value Added Tax, the issuing of an invoice is mandatory which must be retained for 8 years in accordance with Section 169 (2) of the Act C of 2000 on Accounting [Data processing according to of Article 6 (1) c) of the Regulation].

### **Data processing related to the transport of goods**

Data is processed for the delivery of the ordered product.

### **Processed data**

Name, address, e-mail address, phone number.

### **Duration of data processing**

The Data Controller processes the data for the period of delivery of the ordered goods.

### **The legal basis for data processing**

Performance of the contract. [Data processing pursuant to Article 6 (1) (b) of the Regulation]

## **Warranty services**

Data is processed for the management of warranty complaints. If you have requested a warranty service, data processing and data entry are essential.

### **Processed data**

Buyer's name, phone number, e-mail address, content of complaint.

### **Duration of data processing**

Warranty complaints are kept for 5 years according to the Consumer Protection Act.

### **The legal basis for data processing**

Requesting warranty procedures from us is a voluntary decision, however, if you request a procedure, according to Section 17/A (7) of Act CLV of 1997 on Consumer Protection we are obliged to keep the complaint for 5 years [data processing according to Article 6 (1) (c) of the Regulation]

## **Management of other consumer complaints**

Data is processed for the management of consumer complaints. If you contact us with a complaint, data processing and data entry are essential.

### **Processed data**

Buyer's name, phone number, e-mail address, content of complaint.

### **Duration of data processing**

Warranty complaints are kept for 5 years according to the Consumer Protection Act.

### **The legal basis for data processing**

Contacting us with a complaint is a voluntary decision, however, if you contact us, according to Section 17/A (7) of Act CLV of 1997 on Consumer Protection we are obliged to keep the complaint for 5 years [data processing according to Article 6 (1) (c) of the Regulation]

## **Data processed in relation to the verifiability of the consent**

During registration, ordering, signing up for the newsletter, the IT system will store the information related to the consent for future verification.

### **Processed data**

Date of consent and IP address of the data subject.

### **Duration of data processing**

Due to legal requirements consent must be verified, therefore data is stored for a period of limitation after data processing ends.

### **The legal basis for data processing**

Article 7 (1) of the Regulation imposes this obligation. [Data processing under Article 6 (1) (c) of the Regulation]

## **Data processing for marketing purposes**

### **Data processing related to sending newsletters**

#### **Processed data**

Name, address, e-mail address, phone number.

#### **Duration of data processing**

Until consent is withdrawn.

#### **The legal basis for data processing**

Your voluntary consent to the Data Controller when signing up for the newsletter. [Data processing under Article 6 (1) (a) of the Regulation]

### **Data processing related to sending and displaying personalized ads**

#### **Processed data**

Name, address, e-mail address, phone number.

#### **Duration of data processing**

Until your consent is withdrawn.

#### **The legal basis for data processing**

Your voluntary consent to the Data Controller during data recording. [Data processing under Article 6 (1) (a) of the Regulation]

## **Remarketing**

Az adatkezelés mint remarketing tevékenység cookie-k segítségével valósul meg.

### **Processed data**

Data processed by cookies as defined in the section on cookies.

### **Duration of data processing**

More information on the duration of data storage by cookies can be found here:

Google general cookie policy: <https://www.google.com/policies/technologies/types/>

Google Analytics cookie policy: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>

Facebook cookie policy: [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)

### **The legal basis for data processing**

Your voluntary consent to the Data Controller provided with the use of the website. [Data processing under Article 6 (1) (a) of the Regulation]

## Contests

Data processing is performed for conducting the competition.

### Processed data

Name, e-mail address, phone number.

### Duration of data processing

Data is deleted after the competition is over, except for the data of the winner, which must be kept by the Data Controller for 8 years according to the Act on Accounting.

### The legal basis for data processing

Your voluntary consent to the Data Controller provided with the use of the website. [Data processing under Article 6 (1) (a) of the Regulation]

### Further data processing

If the Data Controller wishes to carry out further data processing, it shall provide prior information on the circumstances of data processing (the legal background and legal basis of data management, the purpose of data processing, the range of the data processed, the duration of data processing).

Please be advised that written requests for information by law from the authorities must be complied with by the Data Controller. Az Adatkezelő az adattovábbításokról az Infotv. 15. § (2)-(3) bekezdésével összhangban nyilvántartást vezet (mely hatóságnak, milyen személyes adatot, milyen jogalapon, mikor továbbított az Adatkezelő), amelynek tartalmáról kérésére az Adatkezelő tájékoztatást nyújt, kivéve, ha a tájékoztatását törvény kizárja.

## On the use of a Data processor and their activities related to data processing

### Data processing for storing personal data

**Name of the data processor:** UNAS Online Kft.

**Contact details of the data processor:**

**Phone number:**

**E-mail address:** unas@unas.hu

**Headquarters:** 9400 Sopron, Kőszegi út 14.

The Data Processor stores personal data on the basis of a contract with the Data Controller. The Data Processor is not entitled to access personal data.

### Data processing related to the sending newsletters

**Name of the company operating the newsletter system:** UNAS Online Kft.

**Headquarters of the company operating the newsletter system:** 9400 Sopron, Kőszegi út 14.

**Phone number of the company operating the newsletter system:**

**E-mail address of the company operating the newsletter system:** unas@unas.hu

The Data Processor participates in the sending of newsletters on the basis of the contract with the Data Controller. In doing so, the Data Processor shall process the data subject's name and e-mail address to the extent necessary for sending the newsletter.

### Data processing related to online payments

**Name of the data processor:** PayLike

**Headquarters of the data processor:** Headquarters of the data processor: P. O. Pedersensvej 14, Aarhus, Denmark

**Phone number of the data processor:** +45 78 75 51 61

**E-mail address of the data processor:** hello@paylike.hu

The Data Processor participates in the execution of online payments on the basis of the contract with the Data Controller. In doing so, the Data Processor processes data subject's billing name and address, number and date of order within the limitation period defined in the Civil Code.

### Your rights during data processing

During the period of data processing, you are entitled to the following rights under the provisions of the Regulation:

- the right to withdraw consent
- access to personal data and data management information
- right to rectification
- restriction of data processing
- right to erasure
- right to object
- right to portability.

If you wish to exercise your rights, this will involve your identification and the Data Controller must communicate with you. Therefore, you will be required to provide personal information for identification purposes (but identification may only be based on data that the Data Controller handles about you anyway) and your data processing complaints will be available in the Data Controller's email account within the time period specified in this information. If you have been our buyer and would like to identify yourself for complaint or warranty purposes, please provide your order ID for identification. By using this information, we can also identify you as a buyer.

Complaints related to data processing will be answered by the Data Controller within 30 days at the latest.

### The right to withdraw consent

You have the right to withdraw your consent to data processing at any time, in which case the data you provide will be deleted from our systems. However, please note that for orders that have not yet been fulfilled, withdraw may result in us being unable to deliver to you. In addition, once your purchase has been completed, we will not be able to delete billing information from our systems in accordance with accounting requirements, and if you owe us, we may process your information based on a legitimate interest in collecting our claim even if your consent is withdrawn.

### Access to personal data

You have the right to receive feedback from the Data Controller as to whether your personal data is being processed and, if data processing is in progress, to:

- have access to the processed data and
- to be informed by the Data Controller of the following:
  - the purposes of data processing;
  - the categories of personal data processed about you;
  - information on the recipients or categories of recipients to whom the Personal Data have been or will be disclosed by the Data Controller;
  - the intended period for which the personal data will be stored or, if this is not possible, the criteria for determining this period;
  - your right to request from the Data Controller the rectification, erasure or limitation of processing of your personal data and to object to the processing of personal data based on a legitimate interest;
  - the right to lodge a complaint to the supervisory authority;
  - if the data were not collected from you, all available information on their source;
  - the fact of automated decision making (if applicable), including profiling, and at least in these cases the applied logic and the significance and expected consequences of such data processing for you.

The purpose of exercising the right may be to establish and verify the lawfulness of the data processing, and therefore, in the event of multiple requests for information, the Data Controller may charge a reasonable fee in exchange for the provision of the information.

Data Controller will provide access to your personal data by first identifying you and then sending the processed data and information to you via e-mail. If you have a registration, we will grant you access by logging in to your account to view and verify the personal information about you.

Please indicate in your application whether you are requesting access to personal data or requesting information on data processing.

### **Right to rectification**

You have the right to request the Data Controller to correct any inaccurate personal information about you without delay.

### **Restriction of data processing**

You are entitled to request that the Data Controller restrict your data processing if any of the following is true:

- You dispute the accuracy of your personal data, in which case the limitation applies to the period of time that allows the Data Controller to verify the accuracy of your personal information;
- the data processing is unlawful, but you are against the deletion of the data for any reason (for example, because the data are important to you because of a legal claim) and therefore do not request the deletion of the data, but instead request a restriction on their use;
- the Data Controller does not need the personal data for the indicated data processing, but you request them for filing, enforcement or defence of legal claims.
- or you have objected to the data processing, but there may also be a legitimate interest of the Data Controller to justify the data processing, in which case the data processing must be limited until it is determined whether the legitimate grounds of the Data Controller take precedence over your legitimate reasons.

Where personal data processing is subject to restrictions, such personal data may be processed, except for storage, only with the consent of the data subject or for the purpose of submitting, asserting or defending legal claims or other natural or legal persons or of an important public or Union interest.

The Data Controller will inform you in advance about lifting restrictions (at least 3 working days prior to the lifting of the restriction).

### **Right to erasure - to forget**

You are entitled to have your personal data deleted without undue delay if any of the following applies:

- the personal data are no longer needed for the purpose for which they were collected or otherwise processed by the Data Controller;
- You withdraw your consent and there is no other legal basis for data processing;
- You are protesting against the data processing based on legitimate interests and there is no priority legitimate reason (i.e. legitimate interest) for data processing,
- Data Collector processed the data unlawfully and that has been established based on the complaint,
- the personal data must be deleted to fulfil the legal obligations of Data Controller in accordance with EU or Member State legislation.

If the Data Controller has for any legitimate reason, disclosed your personal information, and the data needs to be deleted for any of the above reasons, it must be executed in a reasonable manner (including technological steps) taking the available technology and cost of execution into consideration, so that Data Controller can inform other Data Controllers that you have requested the deletion of links to personal data or duplicate personal data.

Deletion shall not apply where processing is necessary:

- to exercise the right to freedom of expression and information;
- to fulfil an obligation under EU or Member State law applicable to the controller for the processing of personal data (in this case, billing data processing as the retention of the invoice is required by law) or in the public interest or in the exercise of public authority delegated to the data controller;
- to assert, enforce or defend legal claims (e.g. if the Data Controller has a claim against you that has not yet been fulfilled, or a consumer or data processing complaint is pending).

### **Right to object**

You have the right to object at any time to the processing of your personal data for legitimate reasons related to your situation. In this case, the Data Controller may no further process the personal data, unless it proves that the processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the filing, enforcement or defence of legal claims.

If your personal data is being processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for this purpose, including profiling, if it is related to direct marketing. If you object to the processing of personal data for the purpose of direct marketing, personal data may no longer be processed for this purpose.

### **Right to portability**

If the data processing is done in an automated way, or if the data processing is based on your voluntary consent, you have the right to request the Data Controller to receive the data you provide to the Data Controller in xml, JSON or csv format. If technically feasible, you may request the Data Controller to transfer the data in this form to another Data Controller.

### **Automated decision making**

You have the right not to be subject to any decision based solely on automated data processing (including profiling) that would have legal effect or would have a significant effect on you. In such cases, the Data Controller shall take appropriate measures to protect

the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention, to express his or her views and to object to the decision.

These shall not apply where the decision:

- is necessary for the conclusion or performance of a contract between you and the data controller;
- is made possible by EU or national law applicable to the data controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- or requires your explicit consent.

### **Signing in to the data protection registry**

Pursuant to the Infotv., the Data Controller had to report certain data processing operations to the Data Protection Registry. This obligation of notification became null and void on May 25th 2018.

### **Data security measures**

The Data Controller declares that he/she has taken appropriate security measures to protect personal data against unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction and damage, or the loss of access due to changes in the technology used.

Data Controller will do everything in terms of organizational and technical capabilities to ensure that data processors can take appropriate data security measures when processing your personal data.

### **Legal remedies**

If, in your opinion, the Data Controller has violated any legal provision on data processing or has not complied with any of its requests, the National Authority for Data Protection and Freedom of Information may initiate an investigation procedure to terminate the alleged unlawful data processing (mailing address: 1363 Budapest, Pf.:

We also inform you that in case of violation of legal provisions on data processing, or if the Data Controller has not complied with any of his/her requests, he/she may file a civil lawsuit against the Data Controller in court.

### **Modification of the privacy policy**

The Data Controller reserves the right to modify this Privacy Policy in a manner that does not affect the purpose and legal basis of the data processing. By using this website after the change comes into effect, you accept the modified privacy policy.

If the Data Controller intends to further process the data collected for purposes other than the purpose for which they were collected, he/she t will inform you of the purpose of the data processing and the following information:

- the duration of the storage of personal data or, if this is not possible, the criteria for determining the time period;
- your right to request from the Data Controller access to, rectification, erasure or restriction of your personal data, that you may object to the processing of personal data in the case of data processing based on a legitimate interest and may request to exercise the right to data portability in the case of data processing based on consent or contractual relationship;
- in case of consent-based data processing, that you may withdraw your consent at any time,
- the right to lodge a complaint to the supervisory authority;
- whether the provision of personal data is based on a legal or contractual obligation or a prerequisite for entering into a contract, whether you are required to provide personal information, and the possible consequences may be in case you fail to provide data;
- the fact of automated decision making (if applicable), including profiling, and at least in these cases the applied logic and the significance and expected consequences of such data processing for you.

The data processing can only start after these have been fulfilled. If the legal basis of the data processing is consent, in addition to providing you with information you also have to give your consent to the data processing.

This document contains all relevant data processing information regarding the operation of the webshop in accordance with the General Data Protection Regulation 2016/679 of of the European Parliament and Council (hereinafter referred to as: Regulation. GDPR) and Act CXII of 2011 (hereinafter)