

**HOLLOHÁZI PORCELAIN MANUFACTORY**  
**WEBSHOP**  
**PRIVACY POLICY AND DECLARATION**

The Data Controller of Hollóházi Porcelánmanufaktúra Kft.'s webshop is Hollóházi Porcelánmanufaktúra Kft. (registered office: 3999 Hollóháza, Károlyi út 11., company registration number: Miskolc General Court 05-09-026489, tax number: 24798954-2-05, contact: info@hollohazi1777.hu, hereinafter also referred to as the Data Controller).

Hollóházi Porcelánmanufaktúra Kft. confirms that the capitalised terms defined in this privacy policy and declaration are the same as those defined in the declaration issued by Hollóházi Porcelánmanufaktúra Kft. on the ordering and use of goods offered by the company, as well as on the description of the receipt procedure and the delivery terms (hereinafter referred to as the "Delivery Terms")

The purpose of this Privacy Policy and Declaration is to inform the customers of Hollóházi Porcelánmanufaktúra Kft. about the processing of personal data, the purposes and conditions of the processing of personal data during the sale of goods on the online platform and the registration required for this purpose, and to record the rights and obligations of visitors, registered users and customers, as well as the Data Controller in relation to this activity.

The Data Controller undertakes to ensure that its processing of data through this website is at all times in accordance with this notice and statement. The Data Controller reserves the right to unilaterally amend this notice and statement at any time, provided that the Data Controller does not make any changes that would adversely affect the operation of the website in accordance with the principles of personal data protection.

If you have any questions regarding the processing of personal data on this website, please contact us by e-mail at info@hollohazi1777.hu or by post at 3999 Hollóháza, Károlyi út 11.

The webshop is developed and maintained by Appsters Mobiltartalom-fejlesztő Korlátolt Felelősségű Társaság (headquarters: 1023 Budapest, Lukács utca 4. 3. floor. 8., company registration number: 01-09-947838, tax number: 22988197-2-41).

Hollóházi Porcelánmanufaktúra Kft. and its data processors implement appropriate technical and organisational measures to ensure a level of data security appropriate to the level of risk, taking into account the state of the art and the cost of implementation, the nature, scope, context and purposes of the processing, and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons.

## **I. WEBSHOP DATA MANAGEMENT**

### **1. Processing of visitors' data**

Visits to the <https://hollohazi.hu> site are automatically logged by the web server.

The purpose of data processing is to monitor the functioning and quality of the services provided during visits to the website, to prevent and investigate possible attacks and abuse and to collect statistical data.

Legal basis for processing: the legitimate interest of the Data Controller in the operation of the website, the smooth operation of the sale of goods, the maintenance of the user experience and the achievement of the purposes set out above.

The type of data processed: the IP address of the visitor's electronic device, the time of the visit, the address of the page visited, if the visitor's device settings allow, the type of browser and operating system of the visitor.

Data processor: Appsters Kft.

Data processing duration: 90 days

Guarantees: the Data Controller does not link or transmit the visitor data, they are not in themselves suitable for identifying the visitor or for drawing conclusions about his/her identity.

The website of Hollóházi Porcelánmanufaktúra Kft. gives visitors the opportunity to view and download the online catalogue of Hollóházi Porcelánmanufaktúra Kft., as well as to share it with third parties via an automatic system-generated message on the e-mail system (required data: name of visitor, e-mail address of visitor, e-mail address of recipient).

### **2. Webshop registration**

When using the Hollóházi Porcelánmanufaktúra Kft. webshop, users have the opportunity to create an online user account by registering, which means that they do not have to provide their personal data every time they make a purchase, and can track their current and previous purchases with the registered profile.

When registering, you can give your consent to receive direct marketing enquiries (newsletters) by ticking a checkbox (for more information on the conditions for sending newsletters, see section 4).

You can delete your registration by clicking on the "Delete account" button in the "My account/Account details" section of the website after logging in or by sending a request to [info@hollohazi1777.hu](mailto:info@hollohazi1777.hu); in the latter case, please provide the name and e-mail address necessary to identify the user account to be deleted, without which the Data Controller will not be able to fulfil the deletion request in this way.

The purpose of data management: recording the data of users necessary for identification and contact for the use of services available on the website.

Legal basis for processing: the voluntary and informed consent of the user. The information necessary to give informed consent is provided in this notice and statement, which is easily accessible to the user during registration.

Possible consequences of not giving consent: the user concerned will not be able to benefit from the conveniences offered by the webshop's user profile, and will be required to provide all the personal data necessary for the purchase each time they make a purchase.

Scope of data processed: the minimum data required for registration are first name, last name, e-mail address and password. After registration, the registered user can enter his/her contact details and telephone number (under the menu item Address Book), which are necessary for making purchases through the webshop (for more information on these details, see section 3).

Data processor: Appsters Kft.

Duration of data processing: until the registration is deleted (until the user's consent is withdrawn).

Guarantees: the Data Controller collects only the minimum data necessary to identify and contact the user. The Data Controller does not request or process any special data. The Data Controller does not transmit the collected user data.

### **3. Shopping via the webshop**

When using the webshop of Hollóházi Porcelánmanufaktúra Kft., users have the possibility to purchase Hollóházi goods online with or without registration, by providing the necessary data for identification, billing, delivery and other purposes.

If the user wishes to make a purchase via the webshop after logging in with his/her registered user profile, the interface will extract his/her personal data from the personal data stored during registration. If the user has not entered his/her contact details in his/her profile after registration, the system will ask for these details at the time of purchase, as these details (see below) are required for invoicing and possible delivery. If the user makes a purchase through the webshop and the product to be purchased is available in the stock of Hollóházi Porcelánmanufaktúra Kft., Hollóházi Porcelánmanufaktúra Kft. will confirm the successful purchase to the user by e-mail. If the user wishes to purchase goods through the webshop that are not available in the stock of Hollóházi Porcelánmanufaktúra Kft., Hollóházi Porcelánmanufaktúra Kft. will confirm the purchase by e-mail, and will also inform the user that it will start the production of the goods, which is expected to take 40 (forty) calendar days.

The purpose of data processing: to enable the purchase of goods in the webshop of Hollóházi Porcelánmanufaktúra Kft., the purchase, invoicing, delivery to customers, as well as to document the fact of purchase and payment, to fulfil accounting obligations, to maintain contact with customers.

The legal basis for data processing: the performance of a sales contract with the users, based on the general terms and conditions of the Data Controller, which is automatically concluded with the placing of an order in the webshop; the performance of a legal obligation with regard to the data of the purchases (date and time, goods purchased, value of the purchase), with regard to Section 169 (2) of the Act on Accounting.

The data processed: details of each purchase (date, time, goods purchased, value of the purchase). For registered users, the personal data provided during registration and, if previously recorded, the data in the address book (see point 2). For customers without a registered user account, surname, first name, company (optional), billing/delivery address, telephone number.

If payment by credit card is available in the webshop, the credit card and transaction data will be processed by K&H Bank Zrt. using its own payment interface. The Data Controller does not have access to the data processed on the payment platform of K&H Bank Zrt.

Data processor: Appsters Kft.

Duration of data processing: eight years for the data of purchases pursuant to Section 169 (2) of the Act on the Payment of Bills of Exchange; if payment by credit card is available on the site, the period of time for the data of such payment is set out in the data protection terms of K&H Bank Zrt.

Data transmission: if the credit card payment is available on the site, the payer's ID, the amount, date and time of the transaction to K&H Bank Zrt.

If you choose the option for the delivery of goods, the name of the recipient, the delivery address, the value of the order in the case of domestic delivery address is CS-Sprint Courier Service, CS 80 Kft. (registered office: 1161 Budapest, Csömöri út 78-80., company registration number: 01 09 671423, tax number: 12149676242), or DHL Express Hungary Kft. (registered office: 1185 Budapest, BUD International Airport 302. building., company registration number: 01 09 060665, tax number: 10210798244).

Guarantees: the Data Controller and the Data Processor store the purchase data and the personal data provided in connection with the purchase electronically in their administration systems, using secure systems with software protection. The Data Controller collects only the minimum data necessary for the purposes indicated above. The Data Controller does not request or process any special data. The Data Controller will only transmit the collected data to the persons specified in this point, unless otherwise provided by law.

The Hollóházi Porcelánmanufaktúra Kft. confirms that in case of purchasing goods through the webshop, the delivery of the goods - in accordance with the Terms of Delivery - is carried out by the CS-SPRINT Courier Service in Hungary and by the DHL Express Courier Service abroad, in this context the courier services inform the users about all the stages of the delivery (ordering the service, delivery of the goods for delivery, expected delivery time, notification of the obstacle, successful delivery, etc.) by e-mail.

The Hollóházi Porcelánmanufaktúra Kft. confirms that if the user indicates that he/she would like to receive the goods in person, the Hollóházi Porcelánmanufaktúra Kft. showroom or brand store in Budapest will inform the user about the conditions, time, exact location, etc. of the receipt of the goods, by e-mail or telephone.

Hollóházi Porcelánmanufaktúra Kft. confirms that the terms and conditions set out in this information and declaration shall also apply in the event that the user purchases a gift card via the webshop (required data: name, address, e-mail address, telephone number) or submits a

request for a replacement gift card (required data: name, address, e-mail address, telephone number).

#### **4. Newsletter**

Users subscribed to the newsletter of Hollóházi Porcelánmanufaktúra Kft. can receive the latest products, special offers and discounts of Hollóházi Porcelánmanufaktúra Kft. by e-mail.

During registration and after providing personal data at the time of purchase, the user has the possibility to give his/her consent to receive direct marketing communications (newsletters) by ticking a checkbox. If the checkbox is left unchecked, the Data Controller will not send the user a newsletter.

You can unsubscribe from the newsletter by clicking on the "unsubscribe" button in the footer of the newsletter or by logging into the "My Account/User Account Dashboard" on the website. After unsubscribing the user, the Data Controller will no longer send the newsletter to the user. After unsubscribing, the user can subscribe to receive newsletters again at any time in the menu of his/her user account indicated above.

The unsubscription does not affect any previous registration of the user in the webshop, which can be cancelled as set out in point 2.

The purpose of the processing: to provide direct marketing activities to subscribers in the form of e-mails containing commercial advertising.

Legal basis for processing: voluntary and informed consent of subscribers.

Possible consequences of not giving consent: the data subject may not receive information contained in the newsletters of Hollóházi Porcelánmanufaktúra Kft.

The scope of the data processed: the fact of subscribing to the newsletter, identification number, date and time, e-mail address, name.

Data processor: Appsters Kft., Hollóházi Prcelánmanufaktúra Kft.

Duration of data processing: until the consent of the subscribed user is withdrawn (unsubscribed)

Guarantees: the Data Controller will only send newsletters with voluntary consent and will cease its activities immediately after the withdrawal of consent, and will not use the user's consent for the transmission of third party advertisements or for any other purpose other than those set out above, nor will it transmit the data.

#### **5. Use of cookies (cookies)**

The webshop of Hollóházi Porcelánmanufaktúra Kft. uses so-called HTTP cookies to operate the website and improve the user experience. These are data packets between the server and the user's browser, which are created by the web server on the user's device with the help of the browser, where they are stored in a separate directory.

Type and description of cookies used on the website

Technically Necessary Cookies: cookies that are essential for the website to function and that our website is obliged to store. In addition to ensuring the proper functioning of the website,

technically necessary cookies are also used to enable web analytics measurements for statistical purposes.

The legal basis for the use of technically necessary cookies is the legitimate interest of the Data Controller, but it is also in the interest of users to manage them, without them the use of the webshop would not be possible.

Functional cookies: they play a role in the management of login data, comments, tasks, transaction history and the display of advertisements on the site.

The legal basis for the use of functional cookies is the user's consent, which can be given by ticking the box in the form of a pop-up window that appears when you first visit the website.

The possible consequence of not giving consent is that the user will not be able to use all the website's convenience features.

Convenience cookies: analysing the user's use of the site, they enable the display of personalised offers and content and, by analysing user preferences, they enable the improvement of services.

The legal basis for the use of convenience cookies is the user's consent, which can be given by ticking the box in the form of a pop-up window that appears when the user first visits the website.

The possible consequences of not giving your consent are that you will not be able to use all the website's convenience features, and that you will not be able to view personalised and relevant advertisements and content.

## **II. Users' (data subjects') rights and means of enforcement**

Right to request information: the User has the right to receive feedback from the Data Controller as to whether the processing of his/her personal data is ongoing and, if it is ongoing, to be informed of the data processed by the Data Controller and of any relevant information concerning the processing.

Right of rectification: the User may request the Controller to rectify inaccurate personal data concerning him/her without undue delay. Otherwise, the User may modify the data provided during registration on the website at any time after logging in under "My Account/Account Data". Users can find information on how to modify the data provided during a purchase without registration in the order confirmation e-mail, or by contacting [info@hollohazi1777.hu](mailto:info@hollohazi1777.hu).

Right of erasure (right to be forgotten): the User may request the erasure of his/her personal data, unless the processing is necessary

- The Data Controller may request the deletion of personal data if it is necessary for the fulfilment of the Data Controller's legal obligations;
- If the Data Controller does not require the processing of personal data for the purposes of the fulfilment of a legal obligation or for the establishment, exercise or defence of legal claims;
- for reasons of public interest relating to public health.

The Data Controller shall delete the personal data without undue delay if the processing of the data is unlawful, incomplete or inaccurate, the purpose of the processing has ceased, the User

has withdrawn his or her consent or the storage period has expired, or the Data Controller has been ordered by a court or public authority, or the deletion is necessary to comply with a legal obligation of the Data Controller.

The User has the right to withdraw consent in the same simple way as to give it. If there is no other legal basis for the processing, the Controller shall delete the personal data concerned by the withdrawn consent.

**Right to restriction:** the User has the right to have the Data Controller restrict the processing of his/her personal data at his/her request if.

- the User contests the accuracy of the personal data - for the time necessary to verify the accuracy;
- the processing is unlawful but the User opposes the erasure of the data and requests the restriction of use;
- the Controller no longer needs the personal data for the purposes of the processing but the User requires them for the establishment, exercise or defence of legal claims; or
- the User objects to the processing of his/her data based on the legitimate interests of the Controller or a third party.

During the restriction period, the Data Controller may not use the personal data for any purpose other than storage.

**Right to data portability:** the User has the right to receive from the Controller the data provided to the Controller in a structured, commonly used, machine-readable format and to transmit such data to another controller, if the processing is based on his/her consent or on the performance of a contract and is carried out in an automated way.

In the event of the exercise of the User's rights, the Data Controller shall examine the User's request and take the necessary measures, and shall inform the User of these measures, the reasons for not taking them and the possibilities of legal remedy within 25 days of receipt of the request.

### **Enforcement options:**

The User may make a request for data processing by sending an e-mail to [info@hollohazi1777.hu](mailto:info@hollohazi1777.hu).

In the event of a breach of his rights, the User may bring the matter before the competent court in the place where the Data Controller has its registered office or, at his option, the competent court in the place where he resides or, failing that, in the place where he is domiciled.

Users can find out about the jurisdiction of the courts on the following website:

<http://birosag.hu/ugyfelkapcsolati-portal/illetekessegkereso>

The User may also lodge a complaint with the National Authority for Data Protection and Freedom of Information using one of the contact details below and request an investigation on the grounds that there has been or is an imminent threat of a breach of rights in relation to the processing of personal data.

(1125 Budapest, Szilágyi Erzsébet Fásor 22/c.; +36 (1) 391-1400; [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu),  
<http://naih.hu>)