

## Pureco Ltd. privacy policy about the company's official website and newsletter communication

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### 1. Introduction

- 1.1. The purpose of this notice (the "Notice") is to set out the data protection and management principles applied by Pureco Kft (registered office: 1118 Budapest, Rétköz utca 5.; registered no.: 01 09 869203; hereinafter referred to as the "Data Controller") as the owner of the website [www.pureco.hu](http://www.pureco.hu) (the "Website") and as the newsletter provider of Pureco, which the Data Controller acknowledges as binding for itself in connection with the newsletter service and the operation of the Website.
- 1.2. This Notice describes the data management of visitors to the Data controller's website, the use of cookies, and the principles of the management of personal data provided by persons who subscribe to the newsletter via the Website and on paper and provide information to data subjects on the management of their personal data.
- 1.3. In drafting the provisions of the Notice, the Data Controller has taken account of the provisions of Regulation 2016/679 of the European Parliament and of the Council ("GDPR"), Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information ("the Information Act") and Act V of 2013 on the Civil Code ("the Civil Code").

### 2. Data of the controller

- 2.1. The Data Controller is responsible for the lawful processing of your personal data.

You can find us on the contact details below:

Name of the Data Controller: Pureco Ltd.

Registered and mail address: 1118 Budapest, Rétköz utca 5.

Registered no: 01 09 869203

E-mail: [info@pureco.hu](mailto:info@pureco.hu)

Website: [www.pureco.hu](http://www.pureco.hu)

Phone number: +36 1 224 0670

### 3. Short introduction of data management

#### 3.1. Visitor data management on the Controller's website - Information on the use of cookies

3.1.1. In line with common internet practice, our Company also uses cookies on its website. A cookie is a small file containing a series of characters that is placed on a visitor's computer when they visit a website. When you visit that site again, the cookie enables the site to recognize the visitor's browser. Cookies may also store user preferences (e.g. language chosen) and other information. Among other things, they may collect information about the visitor and his or her device, remember the visitor's individual preferences, or be used, for example, when using online shopping carts. In general, cookies facilitate the use of the website, help the website to provide users with a real web experience and an effective source of information, and enable the website operator to monitor the functioning of the site, prevent abuse and ensure the smooth and adequate provision of services on the website.

3.1.2. There are many types, but they generally fall into two broad categories. One is the temporary cookie, which is placed on the user's device by the website only during a particular session (e.g. during the security authentication of an online banking transaction), and the other is the persistent cookie (e.g. a website language setting), which remains on the computer until the user deletes it. According to the European Commission's guidelines, cookies [unless strictly necessary for the use of the service] can only be placed on the user's device with the user's permission.

3.1.3. In the case of cookies that do not require the user's consent, information should be provided during the first visit to the website. It is not necessary for the full text of the cookie notice to be displayed on the website, it is sufficient for website operators to briefly summarise the substance of the notice and provide a link to the full notice.

3.1.4. The cookies used on the website are not in themselves capable of identifying the user.

3.1.5. Cookies used by our Company, which are cookies that ensure the performance of our website:

Google Analytics cookies - information is available here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

- Google AdWords cookies - information is available here:

<https://support.google.com/adwords/answer/2407785?hl=hu>

- Tracking cookie visit for analysis (third party)  
Name: google analytics 4 - (\_gtag) global site tag  
Contribution is needed  
Purpose: To collect information about the use of the site and the activity of the User.  
When you visit the site, it is linked to services provided by third parties (e.g. Google).  
Validity: 2 years

3.1.5.1. Our Company's website also records and processes the following data about the visitor and the device used for browsing when using the website:

- the IP address used by the visitor,
- the browser type,
- the characteristics of the operating system of the browsing device (language set),
- time of visit,
- the (sub)page, function, or service visited.

3.1.6. Acceptance or authorisation of the use of cookies is not mandatory. You can reset your browser settings to reject all cookies or to indicate when a cookie is being sent. While most browsers automatically accept cookies by default, these can usually be changed to prevent automatic acceptance and will offer you the choice each time.

### **3.2. Visitor data management on the Controller's website - registration**

3.2.1. The Data Controller provides the download of so-called DWG drawings for the products on the website, but access to these requires prior registration. This is to enable the Data Controller to monitor the use of its intellectual products (drawings, diagrams, etc.). By downloading, you consent to the storage of your data by the Data Controller for the purposes detailed above. To provide the service, the Data Controller will collect personal data from you. In all cases, personal data will be obtained directly from you as the data subject.

3.2.2. Profiling, automated decision-making does not take place when processing your data.

3.2.3. The collection of personal data during registration on the website is carried out electronically by filling in the relevant fields, ticking the appropriate checkbox(es), accepting this Privacy Policy, and clicking on the button to confirm the download. On the website, the natural person registering may give his/her consent to the processing of his/her personal data by ticking the relevant box. It is prohibited to tick the box in advance.

3.2.4. Scope of personal data that may be processed:

- the name of the natural person (surname, first name),
- address,
- telephone number,

- company name,
  - e-mail address,
  - online identifier
- 3.2.5. A The above data are personal data within the meaning of both the GDPR and the law on Information. By providing an e-mail address and Personal Data provided by any User during registration, the User also accepts responsibility for
- the data and consents provided originate from him/her and are true and correct,
  - that he/she is the sole user of the service using the data provided
- 3.2.6. Regarding this assumption of liability, any and all liability in connection with accesses made with a given e-mail address and/or data shall be borne solely by the User who registered the e-mail address and provided the data. If the User has provided third-party data during registration for the use of the service, the User shall be liable, and the Data Controller shall be entitled to claim damages from the User. In such a case, the Data Controller shall provide all reasonable assistance to the competent authorities to establish the identity of the offending person.
- 3.2.7. The Personal Data of a person under the age of 16 may be processed only with the consent of the person who is the legal guardian of the person concerned. The Data Controller is not able to verify the eligibility of the person giving consent or the content of the consent, so the User or the person who is the legal guardian of the person concerned guarantees that the consent is in accordance with the law. In the absence of a declaration of consent, the Data Controller shall not process or collect Personal Data relating to a data subject under the age of 16, except for the IP address used when using the Service, which is automatically recorded due to the nature of the Internet services.
- 3.2.8. Legal basis for processing the legal basis for the processing of the personal data specified above is your consent as the data subject, as defined in Article 6(1)(a) of the GDPR. In any case, the processing is voluntary. You may withdraw your consent at any time, but this does not affect the lawfulness of the processing that took place prior to the withdrawal.
- 3.2.9. Duration of data processing  
The Data Controller will store your personal data until you request the deletion or restriction of your personal data or until you prohibit us from doing so.
- 3.2.10. Data transmission-  
In certain cases, the Data Controller may make available to third parties the Personal Data of the User concerned, which are accessible to the User, in response to a formal judicial or police request, legal proceedings, or due to a reasonable suspicion of infringement or violation of copyright, property rights or other rights, or due to a threat to the interests of the Data Controller, or to the provision of the Services, etc.

**3.2.11. Data security measures**

Within the Data Controller's organisation, your personal data may only be accessed by the Data Controller's employees who are involved in the Data Controller's activities related to the sending of the newsletter. Personal data is treated by the Data Controller as confidential information and will not be disclosed or made available to third parties, including the website service provider (SRG Group Ltd.), or to employees or agents of the Data Controller who do not perform tasks related to the management of the website.

In both of the above cases, the personal data recorded will be stored on a password-protected database on a server accessible only to certain persons, protected by state-of-the-art firewalls and anti-virus software. The database is accessible only to authorised employees, and is protected by a password, a personalized. individualized.

**3.3. Visitor data management - newsletter subscription**

3.3.1. By subscribing to our newsletter, you consent to receive periodic newsletters from the Data Controller about news related to the Data Controller, events, programs, training courses organised by the Data Controller, for the purpose of sending invitations to these. To provide the newsletter service, the Data Controller collects personal data from you. In all cases, the personal data will be obtained directly from you as the data subject.

3.3.2. No profiling or automated decision-making will take place during the processing of your data.

3.3.3. Personal data is collected electronically during registration on the website by filling in the relevant fields, ticking the appropriate checkbox(es), accepting the present newsletter policy and clicking on the button to confirm the subscription. The personal data is recorded on paper by filling in the form provided for this purpose, in accordance with the above mechanism, with the confirmation of the subscription being given by the data subject by signing the form.

**3.3.4. What personal data do we collect?**

We collect the following data when you subscribe to the Data Controller's newsletter:

Name (for the purpose of identifying you);

E-mail address\* (to receive the newsletter).

3.3.5. The data marked with an asterisk are mandatory for subscribing to the newsletter. The above data are considered personal data under both the GDPR and the Information Law by providing the e-mail address of any User and the Personal Data provided during the registration process, the User also accepts responsibility for

- the data and consents provided originate from him/her and are true and correct,

- that he/she is the sole user of the service using the data provided
- 3.3.6. Regarding this disclaimer, any liability in connection with accessing the website using an e-mail address and/or data provided shall be borne solely by the User who registered the e-mail address and provided the data. If the User has provided third-party data during registration for the use of the service, the User shall be liable, and the Data Controller shall be entitled to claim damages from the User. In such a case, the Data Controller shall provide all reasonable assistance to the competent authorities to establish the identity of the offending person.
- 3.3.7. The Personal Data of a person under the age of 16 may only be processed with the consent of the person who is the legal guardian of the person concerned. The Data Controller is not able to verify the eligibility of the person giving consent or the content of the consent, so the User or the person who is the legal guardian of the person concerned guarantees that the consent is in accordance with the law. In the absence of a declaration of consent, the Data Controller shall not process or collect Personal Data relating to a data subject under the age of 16, except for the IP address used when using the Service, which is automatically recorded due to the nature of the Internet services.
- 3.3.8. For what purposes do we collect personal data?  
In connection with the provision of the newsletter service of the Data Controller, the purpose of processing personal data is to periodically inform you about news related to the Data Controller, to inform you about events, programmes, and training courses organised by the Data Controller, to send you invitations to these events.
- 3.3.9. Legal basis for processing  
The legal basis for the processing of personal data as set out in section 3.3.4 is your consent as the data subject, as defined in Article 6(1)(a) of the GDPR. The processing is in any case voluntary. You may withdraw your consent at any time, but this does not affect the lawfulness of the processing that took place before the withdrawal.
- 3.3.10. Duration of data processing  
The Data Controller will process your personal data for the purpose of sending you newsletters until we discontinue our newsletter service or until you unsubscribe from the newsletter or otherwise request the deletion or restriction of your personal data, or you prohibit us from doing so.
- 3.3.11. Data security measures  
The personal data collected when subscribing to the newsletter is recorded by the Data Controller for the purpose of sending the newsletter in the Mailchimp newsletter and database management service provided by The Rocket Science Group LLC (675 Ponce de Leon Avenue Northeast, Suite 5000 Atlanta, GA 30308 United States), through which the Data Controller sends the newsletter to you.

Within the Data Controller's organization, your personal data may only be accessed by the Data Controller's employees who are involved in the Data Controller's activities related to the sending of the newsletter.

The personal data will be treated as confidential information by the Data Controller and will not be disclosed or made available to third parties, including but not limited to The Rocket Science Group LLC (675 Ponce de Leon Avenue Northeast, Suite 5000 Atlanta, GA 30308 United States) or to employees or agents of the Data Controller who are not involved in the newsletter sending process.

In both above cases, the personal data collected will be stored in a password-protected database on a server accessible only to certain persons and protected by state-of-the-art firewalls and anti-virus software. The database is accessible only to authorised employees and is protected by a password, a personalised, individualised.

**3.3.12. Data processor**

The Data Controller sends out its newsletters through the Mailchimp mailing and database management service provided by The Rocket Science Group LLC (675 Ponce de Leon Avenue Northeast, Suite 5000 Atlanta, GA 30308 United States). Personal information collected in Mailchimp is transmitted to the servers of The Rocket Science Group LLC.

The Rocket Science Group LLC. operates the Mailchimp mailing system for the entire duration of the processing and does not process the data on its own behalf. Since The Rocket Science Group LLC does not process any data on its own behalf, it is considered a data processor. It does not process the data. The Data Controller is responsible for the processing of the data.

**3.3.13. Data transmission**

In certain cases, the Data Controller may make available to third parties the Personal Data of the User concerned, which are accessible to the third parties, in response to a formal judicial or police request, legal proceedings, or due to a reasonable suspicion of infringement or violation of copyright, property rights or other rights, or due to a threat to the interests of the Data Controller, or to the provision of the Services, etc.

## **4. Social plugins**

**4.1.1.** Our Company uses so-called plug-in community modules from various social networking sites in its Online Offers; these are described individually in this section.

**4.1.2.** When using the plug-ins, your web browser establishes a direct connection with the servers of the social network concerned. In this way, the relevant service provider will be informed that your Internet browser has gained access to a page of our Company's online offerings, even if you do not have a user account with that service provider or are not logged into your account. In this case, the log files (including the IP address) will be transmitted directly from your web browser to the server of the service provider where they may be stored. The

provider or its server may be located outside the European Union or the EEA (e.g. in the United States).

- 4.1.3. Built-in modules are stand-alone extensions used by social network providers. Therefore, our Company has no control over the data they collect and store.
- 4.1.4. Information about the purpose and scope of the collection, further processing, and use of your data, as well as your privacy rights and the settings that support the protection of your personal data, can be found in the privacy notices of the relevant social networking sites.
- 4.1.5. If you do not want social networking service providers to receive data and, where applicable, to store and use that data, do not use the plug-in.

#### **4.2. Facebook social plugins**

- 4.2.1. The Facebook Service is provided by Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). An overview of Facebook plug-ins and how they appear can be found here: <http://developers.facebook.com/plugins>; information about Facebook's privacy policy can be found here: <http://www.facebook.com/policy.php>.

#### **4.3. LinkedIn social plugins**

- 4.3.1. The LinkedIn Service is provided by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland ("LinkedIn"). For an overview of LinkedIn plug-ins and how they appear, please visit: <https://developer.linkedin.com/plugins>; for information about LinkedIn privacy, please visit: <https://www.linkedin.com/legal/privacy-policy>

#### **4.4. YouTube**

- 4.4.1. Our Company uses YouTube, a video platform provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("YouTube"), to promote our online products and services. YouTube is a platform that allows you to play audio and video files.  
When you use one of our Company's pages that contains an embedded YouTube player, it establishes a connection with YouTube for the transmission and playback of the video or audio file. In doing so, data is transmitted to YouTube as the data controller. We are not responsible for the processing of such data by YouTube.  
For more information about the purpose and scope of the data collected, YouTube's processing and use of the data, as well as your rights and optional settings to support the protection of your personal data, please see YouTube's privacy notice.



## 5. Your rights and remedies

### 5.1. What rights do you have as a data subject in relation to your data?

#### 5.1.1. Right to information and access

You have the right to receive feedback from the Data Controller, upon request, as to whether or not your personal data are being processed and, if such processing is ongoing, the right to access your personal data and the following information

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients to whom the personal data are or will be disclosed (including, in particular, data processors);
- the envisaged storage period of the personal data;
- your rights in relation to the processing of your personal data;
- the source of the data, if not collected from you;
- information on automated decision-making.

We will provide you with information about your personal data free of charge in accordance with applicable law. We will respond to your request in writing within one month. However, where the request is manifestly unfounded or excessive, in particular, because of its repetitive nature, the Data Controller will, subject to the administrative costs of providing the information or information requested or of taking the action requested:

- - charge you a reasonable fee, or
- - refuse to act on the request.

If you have already paid a fee but your data has been processed unlawfully or we need to correct your data as a result of your request, we will refund this fee to you.

If, despite our best efforts to protect your personal information through our advanced data security measures, your personal information is accessed, altered, transferred, disclosed, deleted or destroyed, accidentally destroyed or damaged, or otherwise unlawfully processed by anyone, we will, upon your request, inform you of the circumstances of such an incident, including when it occurred, what the effects may be, and what we have done to prevent or mitigate the consequences.

#### 5.1.2. Right to rectification

If the personal data we process is inaccurate, we will correct it at your request without undue delay. You also have the right to ask us to complete your incomplete personal data by means of a declaration to that effect.

### **5.1.3. Right to erasure**

The Controller shall delete your personal data without delay where:

- the personal data are no longer required for the purpose of sending the newsletter, or
- the Data Controller ceases to provide the newsletter service;
- The processing of personal data is unlawful;
- the erasure is necessary for compliance with a legal obligation to which the Controller is subject;
- where the consent to the processing of the data of a child under the age of 16 has not been given or authorised by the person having parental authority over the child;
- where the controller has disclosed the personal data.

You can also ask us to delete your personal data previously provided to us by by withdrawing the data processing consent we have previously given you. You can unsubscribe from newsletters sent by the Data Controller by using the unsubscribe link in the newsletter. In case of unsubscription, the Data Controller will delete the User's Personal Data in the newsletter database.

### **5.1.4. Right to restriction**

Restrictions on processing may be imposed if:

- You contest the accuracy of your data; in this case, the Controller will restrict the processing of your personal data for a period of time until the accuracy of the data is established;
- You request a restriction of use instead of erasure;
- the Data Controller no longer needs the data but you require them for the purposes of pursuing legal claims.
- If you have requested the restriction of processing, you will be informed in advance by the controller of the lifting of the restriction.

### **5.1.5. Right to data portability**

You have the right to receive the personal data concerning you that the Data Controller has provided to you in a structured, commonly used, machine-readable format (e.g. .doc or .pdf) and the right to transmit these data to another data controller without the Data Controller's hindrance.

### **5.1.6. What happens and what you can do if your application is rejected?**

If the Data Controller refuses your request for rectification, restriction, or erasure, we will inform you in writing within one month of receipt of the request why we have been unable to comply with your request and inform you of your right to judicial remedies and the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information. Our response will be sent by e-mail if you agree to this.

#### 5.1.7. What remedies are available to you?

- If you believe that the Data Controller is processing your personal data in breach of the GDPR, you as the data subject have the right to lodge a complaint with a supervisory authority (i.e. a public authority established by any EU Member State under Article 51 of the GDPR), in particular in the Member State where you are habitually resident, employed or where the alleged breach occurred. In Hungary, the supervisory authority established in accordance with the criteria set out in Article 51 of the GDPR is the National Authority for Data Protection and Freedom of Information (hereinafter referred to as the "NDA" or the "Authority"). Under the GDPR, the supervisory authority concerned is the supervisory authority which is concerned by the processing of personal data based on one of the following grounds:
  - - the controller or processor is established in the territory of the Member State of that supervisory authority;
  - - the processing significantly affects or is likely to significantly affect data subjects residing in the Member State of the supervisory authority; or
  - a complaint has been lodged with that supervisory authority.

Regarding the processing carried out by the Data Controller, the supervisory authority concerned pursuant to points (a) and (b) above is the NCA, given that the Data Controller has its establishment in Hungary and the processing predominantly affects data subjects residing in Hungary. Accordingly, details of the possibility to lodge a complaint with the NAIH are set out in the following section. However, please note that, notwithstanding the above, you have the right to lodge a complaint not only with the Authority, but also with any supervisory authority established in an EU Member State.

#### 5.1.8. Notification to the National Authority for Data Protection and Freedom of Information

Compliance with data protection legislation is monitored by the National Authority for Data Protection and Freedom of Information. If you consider that our data processing does not comply with the relevant legislation, or if you consider that there is an imminent risk of non-compliance, you can notify the Authority by contacting.

Authority name: National Authority for Data Protection and Freedom of Information

Postal address: H- 1363 Budapest, Pf.: 9.

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

Phone number: +36 1 391 1400

Fax number: +36 1 391 1410

For further information on data protection issues, please consult the Authority's website at website: <http://naih.hu/>

Please also note that the Data Controller is obliged to report any personal data breach (i.e. accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data) to the Authority without undue delay and, if possible, no later than 72 hours after the personal data breach has come

to its attention. If the personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Controller shall, without undue delay, inform you as a data subject of the personal data breach.

#### **5.1.9. On judicial enforcement**

You may seek judicial remedies against the Controller if you believe that the Controller, as data controller, has infringed your rights under the GDPR because of the processing of your personal data in a way that does not comply with the GDPR. You may also decide to bring the action before the courts in the place where you reside or stay.

In addition, under the conditions set out in the law, if you suffer damage because of unlawful processing or a breach of data security requirements, you may bring a claim for damages against the Controller in court. If your privacy rights have been infringed, you may be entitled to damages, which you may also claim in court.

### **6. Amendments to the privacy notice**

The Controller reserves the right to amend this Notice at any time by unilateral decision.

The User accepts the current provisions of this Policy by the next login, and no further consent of the individual User is required.

Budapest, 21.07.2023.