

# Privacy Policy

## CONTROLLER'S NAME AND CONTACT DETAILS

**Name of the data controller:** TCS Media Korlátolt Felelősségű Társaság

**Mailing address:** 1045 Budapest, Ősz utca 133. fsz. 2.

**E-mail address:** shop@hybridorium.com

**Telephone number:** +36 70 944 6644

**Website:** <http://shop.hybridorium.com>

## HOSTING SERVICE PROVIDER

**Name:** UNAS Online Kft.

**Mailing address:** 9400 Sopron, Kőszegi út 14.

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

**Telephone number:** +36-99/200-200

### Information on the use of cookies

#### What is cookie?

During the visit of the website the Controller uses so called cookies. Cookie is an information package comprising of a case and figures which is sent to your browser by our webpage in order to save certain of your settings, facilitate the use of our website and enable us to collect some relevant statistic information on our visitors. Cookies do not contain any personal data, thus they are incapable of identifying individual users. Cookies often contain a unique identifier – an encrypted and random generated series of numbers – which will be stored on your computer. Some of the cookies will cease to exist after closing the webpage, while others will be stored for a long time on your computer.

#### Statutory background and legal ground for cookies:

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act) and act CVIII of 2001 on certain issues of electronic commerce services and information society services. In accordance with section 5 (1) a) of the Information Act the legal ground for the data control is provided by your consent.

#### Main characteristics of the cookies used by the website:

**Session cookies:** These cookies store the visitor's location, the language of the browser, the currency of the payment, their lifespan at the close of the browser, or up to 2 hours.

**Age-restricted content cookie:** These cookies confirm the fact that the age-restricted content has been approved and state that the person concerned is over 18 years of age and will live until the browser is closed.

**Referer cookies:** They record what external page the visitor came to the page from. Their lifespan lasts until the browser is closed.

**Last viewed product cookie:** Captures the products that the visitor last viewed. Their lifespan is 60 days.

**Recently viewed category cookies:** Records the last viewed category. Their lifespan is 60 days.

**Recommended products cookies:** The "recommend to a friend" feature captures a list of products you want to recommend. Their lifespan is 60 days.

**Mobile version, design cookie:** It detects the device used by the visitor and switches to full view on mobile. Their lifespan is 365 days.

**Cookie acceptance cookie:** Upon arrival at the site, you accept the statement about the storage of cookies in the warning window. Their lifespan is 365 days.

**Cart cookies:** It records the products placed in the basket. Their lifespan is 365 days.

**Smart offer cookie:** It records the conditions for displaying smart bids (e.g. whether the visitor has already been to the site or has an order). Their lifespan is 30 days.

**Exit # 2 cookie:** Option # 2 allows the visitor to log out after 90 days. Their lifespan is 90 days.

**Backend ID cookie:** The ID of the backend server serving the page. It lasts until you close your browser.

**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 personalize ads on Google products such as Google Search. For example, you use such cookies to remember your recent searches, past interactions with individual advertisers' ads or search results, and visits to advertisers' 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 get a more accurate picture of their visitors' activities. The Service may use cookies to collect information and report statistics about website usage without personally identifying visitors to Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reporting from site usage statistics, Google Analytics, along with some of the advertising cookies described above, can also be used to show more relevant ads on Google products (such as Google Search) and across the web.

**Remarketing cookies:** For past visitors or users to appear when browsing other sites on the Google Display Network or searching for terms related to their products or services.

**Strictly necessary for operation:** These cookies are strictly necessary in order to enable You to move around the website and to use its essential features. In the absence of such cookies several functions of the page will be unavailable for You. Their lifetime is restricted only for the duration of the session.

**Session cookies:** These cookies store the visitor's location, the language of the browser, the currency of the payment, their lifespan at the close of the browser, or up to 2 hours.

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**Exit # 2 cookie:** Option # 2 allows the visitor to log out after 90 days. Their lifespan is 90 days.

**Backend ID cookie:** The ID of the backend server serving the page. It lasts until you close your browser.

**Facebook pixel (Facebook cookie):** A Facebook pixel is a code that is used to report conversions on a website, compile target audiences, and give the page owner detailed analytics data about visitors' use of the website. With the help of the Facebook pixel, you can display personalized offers and advertisements to the visitors of the website on the Facebook interface. You can read Facebook's privacy policy here: <https://www.facebook.com/privacy/explanation>

**If you disagree with the use of cookies, certain functions will be unavailable for you. Find more information about the deletion of cookies on the following links:**

- 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/weboldalak-altal-elhelyezett-sutik-torlese-szamito>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Chrome: <https://support.google.com/chrome/answer/95647>
- Edge: <https://support.microsoft.com/hu-hu/help/4027947/microsoft-edge-delete-cookies>

### Data processed for contracting and performance purposes

Several data management cases may be implemented for the purpose of concluding a contract and performing it. We would like to inform you 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, you are only a visitor to the webshop, then what is written in the data management for marketing purposes may apply to you, if you give us consent for marketing purposes.

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

#### Contact

For example, if you contact us by email, contact form, or phone with a question about a product. Pre-contact is not mandatory, you can order it from the webshop at any time.

#### Managed data

The information you provided during the contact.

#### Duration of data management

The data will only be processed until the contact is completed.

#### Legal basis for data management

Your voluntary consent, which you provide to the Data Controller by contacting us. [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 (eg the data of the data subject does not have to be entered again when purchasing again). Registration is not a condition for concluding a contract.

#### Managed data

During data management, the Data Controller manages your name, address, billing address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase.

#### Duration of data management

Until the withdrawal of your consent.

#### Legal basis for data management

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

#### Order processing

During the processing of orders, data management activities are required in order to fulfill the contract.

#### Managed data

During data management, the Data Controller manages your name, address, billing address, telephone number, e-mail address, the characteristics of the purchased product, the order number and the date of purchase. If you have placed an order in the webshop, data management and the provision of data is essential for the fulfillment of the contract.

#### Duration of data management

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

#### Legal basis for data management

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

#### Issuance of the invoice

The data management process takes place in order to issue an invoice in accordance with the law and to fulfill the obligation to keep accounting documents. The Stv. Pursuant to Section 169 (1) - (2), companies must keep the accounting document directly and indirectly supporting the accounting.

#### Managed data

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

#### Duration of data management

The issued invoices are issued in accordance with the Act. Pursuant to Section 169 (2), it must be retained for 8 years from the date

of issue of the invoice.

#### **Legal basis for data management**

Act CXXVII of 2007 on Value Added Tax. Pursuant to Section 159 (1), the issue of an invoice is mandatory and must be kept for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting [Data Management pursuant to Article 6 (1) (c) of the Decree].

#### **Relating to the carriage of goods data management**

The data management process takes place in order to deliver the ordered product.

#### **Managed data**

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

#### **Duration of data management**

The Data Controller manages the data for the duration of the delivery of the ordered goods.

#### **Legal basis for data management**

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

#### **Recipients and data processors of data processing related to freight transport.**

Name of the consignee: Csomagküldő.hu Kft.

Address: 1031 Vízimolnár utca 10 6/54.

Recipient's telephone number: +36 1 400 88 06

Recipient's e-mail address: info@csomagkuldo.hu

Recipient's website: packageskuldo.hu

The courier service participates in the delivery of the ordered goods on the basis of the contract concluded with the Data Controller. The courier service handles the received personal data in accordance with the data management information available on its website.

#### **Handling warranty and guarantee claims**

The warranty and guarantee claims are set out in Decree 19/2014. (IV. 29.) of the NGM Decree, which also determines how we should handle your claim.

#### **Managed data**

When handling warranty and guarantee claims, 19/2014. (IV. 29.) NGM decree.

Pursuant to the decree, we are obliged to draw up a report on the warranty or guarantee claim reported to us, in which we state: your name, address and a statement that you consent to the processing of the data recorded in the minutes as provided for in the Regulation,

the name and purchase price of the movable property sold within the framework of the contract concluded between you and us,

the date of performance of the contract,

the date of the error report,

a description of the error,

the right you wish to enforce based on your warranty or guarantee claim, and

the method of settling the warranty or guarantee claim or the reason for the rejection of the claim or the right to be enforced on the basis thereof.

If we receive the purchased product from you, we must issue an acknowledgment of receipt, which must state:

your name and address,

data necessary to identify the thing,

the date of receipt of the thing, and

the date when you can receive the corrected item.

#### **Duration of data management**

The undertaking shall keep a record of the consumer's warranty or guarantee claim for three years from the date of its inclusion and shall present it at the request of the inspection authority.

#### **Legal basis for data management**

The legal basis for data management is 19/2014. (IV. 29.) NGM decree [4. § (1) and § 6 (1)] [data processing pursuant to Article 6 (1) (c) of the Decree].

#### **Handling of other consumer complaints**

The data management process is in place to handle consumer complaints. If you have made a complaint to us, data management and the provision of data is essential.

#### **Managed data**

Customer's name, telephone number, email address, content of the complaint.

#### **Duration of data management**

Warranty claims are retained for 3 years under the Consumer Protection Act.

#### **Legal basis for data management**

Whether you have a complaint about your voluntary decision, however, if you do contact us, see the 1997 CLV on Consumer Protection. Act 17 / A.§ (7), we are obliged to keep the complaint for 5 years [data processing according to Article 6 (1) c) of the Decree].

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

During registration, ordering and subscribing to the newsletter, the IT system stores the IT data related to the consent for later proof.

#### **Managed data**

Date of consent and IP address of the person concerned.

#### **Duration of data management**

Due to legal requirements, the consent must be able to be verified later, therefore the period of data storage will be stored for the limitation period after the termination of data processing.

#### **Legal basis for data management**

Article 7 (1) of the Regulation provides for this obligation. [Data processing pursuant to Article 6 (1) (c) of the Regulation]

#### **Data management for marketing purposes**

Data management related to newsletter sending.

The data management process is done to send out newsletters.

#### **Managed data**

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

#### **Duration of data management**

Until the withdrawal of the data subject's consent.

#### **Legal basis for data management**

Your voluntary consent to the Data Controller by subscribing to the newsletter [Data processing under Article 6 (1) (a) of the Regulation]

#### **Additional data management**

If the Data Controller wishes to perform further data management, it shall provide preliminary information on the essential circumstances of the data management (legal background and legal basis of data management, purpose of data management, scope of data processed, duration of data management).

We would like to inform you that the Data Controller must comply with the written data requests of the authorities based on legal authorization. The Data Controller shall inform Infotv. In accordance with Section 15, Paragraphs (2) - (3), it keeps records (to which authority, what personal data, on what legal basis, when was transmitted by the Data Controller), the content of which the Data Controller provides on request, unless its disclosure is excluded by law.

#### **Recipients of personal data**

##### **Data processing for the storage of personal data**

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

**Mailing address:** 9400 Sopron, Kőszegi út 14.

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

**Telephone number:** +36-99/200-200

**Website:** <http://unas.hu>

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

##### **Data processing activities related to newsletters**

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

**Mailing address:** 9400 Sopron, Kőszegi út 14.

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

**Telephone number:** +36-99/200-200

**Website:** <http://unas.hu>

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

##### **Data processing related to the operation of a CRM system**

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

**Mailing address:** 9400 Sopron, Kőszegi út 14.

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

**Telephone number:** +36-99/200-200

**Website:** <http://unas.hu>

The Data Processor participates in the registration of orders on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor handles the name, address, telephone number, number and date of orders of the data subject within the civil law limitation period.

##### **Data processing related to online payment**

**Name of the data processor:** OTP Bank - SimplePay

**The registered office of the data processor:** 1093 Budapest, Közraktár u.30-32.

**Telephone number:** +36 1 5100 374

**E-mail address:**

**Website:** <https://simplepay.hu>

The Data Processor participates in the execution of the Online Payment on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor manages the billing name and address of the data subject, the order number and the date within the civil law limitation period.

**Name of the data processor:** PayPal

**Registered office:** S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal - L-2449 Luxembourg

**Phone number:**

**E-mail address:** [enquiry@paypal.com](mailto:enquiry@paypal.com)

**Website:** <https://www.paypal.com>

The Data Processor participates in the execution of the Online Payment on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor manages the billing name and address of the data subject, the order number and the date within the civil law limitation period.

#### **Your rights during data management**

**Within the period of data processing, you have the following rights in accordance with the provisions of the Regulation:**

- the right to withdraw consent
- access to personal data and data management information
- right of rectification

- restrictions on data management,
- right of cancellation
- the right to protest
- the right to portability.

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

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

#### **Right to withdraw consent**

You have the right to withdraw your consent to data management at any time, in which case the data provided will be deleted from our systems. However, please note that in case of an unfulfilled order, the cancellation may result in us not being able to deliver to you. In addition, if the purchase has already been made, we will not be able to delete your billing information from our systems in accordance with the accounting rules, and if you owe us, we may process your information in the event of a withdrawal of consent based on a legitimate interest in recovering the claim.

#### **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 is being processed, you are entitled to:

- **have access to the personal data processed and**

- **inform the Data Controller of the following information:**

- the purposes of data management;
- categories of personal information processed about you;
- information on the recipients or categories of recipients with whom or with whom the Personal Data has been or will be communicated by the Data Controller;
- the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period;
- your right to request the Data Controller to rectify, delete or restrict the processing of personal data concerning you and to object to the processing of such personal data in the event of data processing based on a legitimate interest;
- the right to lodge a complaint with the supervisory authority;
- if the data was not collected from you, all available information about their source;
- the fact of automated decision-making (if such a procedure has been used), including profiling, and, at least in these cases, understandable information about the logic used and the significance of such data processing and the expected consequences for you.

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

Access to personal data is ensured by the Data Controller by sending you the processed personal data and information by e-mail after your identification. If you have a registration, we will provide access so that you can view and verify the personal information we manage about you by logging into your user account.

Please indicate in your request whether you are requesting access to personal data or requesting data management information.

#### **Right to rectification**

You have the right, at the request of the Data Controller, to correct inaccurate personal data concerning you without delay.

#### **Right to restrict data management**

You have the right, at the request of the Data Controller, to restrict data processing if any of the following is met:

- You dispute the accuracy of the personal data, in which case the restriction applies to the period of time that allows the Data Controller to check the accuracy of the personal data, if the exact data can be established immediately, the restriction will not take place;
- the data processing is illegal, but you object to the deletion of the data for any reason (for example, because the data is important to you in order to enforce a legal claim), so you do not request the deletion of the data, but instead request a restriction on its use;
- the Data Controller no longer needs the personal data for the purpose of the designated data processing, but you request it in order to submit, enforce or protect legal claims;
- **objection** You have objected to the data processing, but the data controller's legitimate interest may also justify the data processing, in which case until the data controller's legitimate reasons take precedence over your legitimate reasons, the data processing must be restricted.

Where data processing is restricted, such personal data may be processed, with the exception of storage, only with the consent of the data subject or for the purpose of bringing, enforcing or protecting legal claims or protecting the rights of another natural or legal person or in the important public interest of the Union or a Member State.

The data controller will inform you in advance (at least 3 working days before the lifting of the restriction) about the lifting of the restriction of data management.

#### **Right to delete - right to forget**

You have the right to have personal data about you deleted by the Data Controller without undue delay if any of the following reasons exist:

- personal data are no longer required 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 the processing;
- You object to the processing of data on the basis of a legitimate interest and there is no overriding legitimate reason (ie a legitimate interest) in the processing of the data,
- the personal data was processed unlawfully by the Data Controller and this was established on the basis of the complaint,
- personal data must be deleted in order to fulfill a legal obligation under Union or Member State law applicable to the Data Controller.

If, for any lawful reason, the Data Controller has disclosed personal data processed about you and is obliged to delete it for any of the reasons set out above, it shall take reasonable steps, including technical measures, to inform the data, taking into account available technology and implementation costs. other data controllers that you have requested the deletion of the links to the personal data in question or of a copy or duplicate of this personal data.

Deletion does not apply if data processing is required:

- for the purpose of exercising the right to freedom of expression and information;
- to fulfill an obligation under EU or Member State law to process personal data (such as data processing in the context of invoicing, as the retention of the account is required by law) or in the public interest or in the exercise of a public authority conferred on the data controller;
- to submit, enforce or protect legal claims (eg if the Data Controller has a claim against you and has not yet fulfilled it, or a consumer or data processing complaint is being processed).

#### **Right to protest**

You have the right to object at any time for reasons related to your situation to the processing of your personal data on the basis of a legitimate interest. In this case, the Data Controller may not further process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons which take precedence over your interests, rights and freedoms, or which are related to the submission, enforcement or protection of legal claims.

If personal data is processed for the purpose of direct business acquisition, 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 business acquisition. If you object to the processing of personal data for the purpose of direct business acquisition, the personal data may no longer be processed for this purpose.

#### **Right to portability**

If the data processing is carried out automatically or if the data processing is based on your voluntary consent, you have the right to ask the Data Controller to receive the data provided by you to the Data Controller, which the Data Controller provides to you in xml, JSON or csv format. If this is technically feasible, it may request that the Data Controller transfer the data in this form to another data controller.

#### **Automated decision making**

You have the right not to be covered by a decision (including profiling) based solely on automated data processing that would have legal effect on you or affect you to a similar extent. In such cases, the Data Controller shall take appropriate measures to protect the data subject's rights, freedoms and legitimate interests, including at least the data subject's right to request human intervention on the part of the Data Controller, to express his or her views and to object to the decision.

#### **The above does not apply if the decision:**

- Necessary for the conclusion or performance of a contract between you and the data controller;
- is made possible by EU or Member State law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests;
- based on your express consent.

#### **Data security measures**

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, and becoming inaccessible due to changes in the technology used.

The Data Controller will make every effort to ensure that its data processors take appropriate data security measures when working with your personal data.

#### **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 Data Protection and Freedom of Information Authority may initiate an investigation procedure to terminate the alleged unlawful data processing

(mailing address: 1363 Budapest, Pf. 9., e-mail : [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

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

#### **Modification of data management information**

The Data Controller reserves the right to amend this data management information in a manner that does not affect the purpose and legal basis of the data management. By using the website after the change takes effect, you accept the amended data management information.

If the Data Controller wishes to perform further data processing in connection with the collected data for a purpose other than the purpose of their collection, it shall inform you about the purpose of the data processing and the following information prior to the further data processing:

- the duration of the storage of personal data or, if that is not possible, the criteria for determining the duration;
- the right to request the Data Controller to access, rectify, delete or restrict the processing of personal data concerning you and to object to the processing of personal data in the case of data processing based on a legitimate interest and to request data portability in the case of data processing based on consent or contractual relationship the right to justice;
- in the case of data processing based on consent, that you may withdraw your consent at any time,
- the right to lodge a complaint with the supervisory authority;
- whether the provision of personal data is based on a law or a contractual obligation or a precondition for concluding a contract, and whether you are obliged to provide personal data, and what the possible consequences of non-disclosure may be;
- the fact of automated decision-making (if such a procedure has been used), including profiling, and, at least in these cases, understandable information about the logic used and the significance of such data processing and the expected consequences for you.

The data processing can only start after that, if the legal basis of the data processing is consent, in addition to the information, you must also consent to the data processing.

This document contains all relevant data management information related to the operation of the webshop in accordance with the General Data Protection Regulation 2016/679 of the European Union (hereinafter: Regulation GDPR) and the 2011 CXII. TV. (hereinafter: Infotv.).