

# Personal Data Management and Privacy Notice

To customers using Magyar Dolgozók Szociális Szövetkezet services via online and offline sales channels and shops.

## I. General Provisions

www.csaviar.hu is the website of Magyar Dolgozók Szociális Szövetkezet (cg .: [01 02 054214](#), székhely: [1027 Budapest, Frankel Leó út 10.](#)) hereinafter referred to as Csaviar or Data Manager, which includes Csaviar food products and other range. By placing an order via the webshop an order agreement is created between Csaviar and the individual purchaser of the order, which has been accepted for registration, under the conditions described in the relevant contractual terms and conditions.

This Privacy Statement (hereafter referred to as "the Notice") regulates and includes rights and obligations related to the handling and, occasionally, processing of personal data provided to the Data Controller or other relevant provisions concerning both online and offline provision and use of any services by Csaviar Ltd.

When handling all personal data, Csaviar is responsible for the direct use of the European Union's legal resources and the current Hungarian legislation in force, in particular the Act CXXII of 2011 on Information Freedom of Information and Freedom of Information (hereafter referred to as Info Law) and EU's 2016/679. General Data Protection Regulation (GDPR).

Csaviar treats personal information received from customers confidential and takes all the necessary steps to ensure secure data management. Csaviar is committed to ensuring the protection of personal data. The primary purpose of this Prospectus is to provide Csaviar customers with all the information they need to make informed decisions about how to handle their personal information.

This Notice is based on the regulations of Info Law and EU's 2016/679. General Data Protection Regulation (GDPR). In the event of any amendment of these laws and / or the entry into force of a new applicable law, Csaviar reserves the right to unilaterally amend the Notice. On matters not covered in this Notice, Info Law shall apply.

In case of amendments to this Notice, Csaviar publishes a notification on its website.

## II. Interpretative provisions

- 1. concerned:** any natural person identified, directly or indirectly, by any identified personal data;
- 2. personal data:** data relating to the data subject, in particular the name, personal ID, and the knowledge of one or more physical, physiological, mental, economic, cultural or social identities of the data subject, and the deduction from the data to the data subject;
- 3. special data;**
  - (a) personal data relating to racial origin, nationality, political opinion or party affiliation, religious or other beliefs of the world, membership of an interest representation organization, personal data relating to sexual life,
  - (b) personal data relating to the state of health, abnormal passion and criminal personal data;
- 4. personal data on criminal matters:** personal data relating to a criminal offense or criminal proceedings relating to criminal proceedings or the detection of criminal offenses in connection with or in connection with criminal proceedings and criminal proceedings;
- 5. data of public interest:** information or knowledge recorded in connection with the exercise of a public or local authority function or any other public function performed by a body or person in charge of the activity or relating to the performance of his or her public duties, the manner in which it is handled, whether it is self-collecting or collecting, in particular its competence, competence, organizational structure, professional activity, its effectiveness, the data types held and the laws regulating the operation, and the data on the management and the contracts concluded;
- 6. public data of public interest:** any data not covered by the notion of public interest information, the disclosure, disclosure or disclosure of which is governed by public law;
- 7. consent:** voluntary and decisive expression of the will of the person concerned, based on appropriate information and with which he or she gives his / her unambiguous consent to the handling of his / her personal data, covering all or part of operations;
- 8. protest:** the statement of the person concerned with which he or she is objecting to the handling of his / her personal data and requesting the termination of the data processing and the cancellation of the processed data;
- 9. data handler** means a natural or legal person or an organization without legal personality who either independently or with others determines the purpose of data management, makes and executes decisions on data handling (including the equipment used) or performs it with the data processor;
- 10. data management/handling:** irrespective of the method used, any operation of the data record or all of the operations, such as collecting, capturing, recording, systematizing, storing, modifying, using, retrieving, transmitting, rendering, aligning, linking, blocking, deleting and destroying any of the operations, as well as preventing further use of

the data, taking photographs, sound or images, and recording physical features (such as finger or palm print, DNA pattern, iris image) for identifying the person;

11. **transmission of data:** making the data available to a specific third party;
12. **disclosure:** making the data available to anyone;
13. **data deletion:** making the data unrecognizable in such a way that its restoration is no longer possible;
14. **data designation:** providing the identification of the data with a view to distinguishing it;
15. **data encryption:** for the purpose of limiting the further handling of the data by means of an identification mark for a definite or fixed period of time;
16. **data destruction:** complete physical destruction of the data medium;
17. **processing of data:** carrying out technical tasks related to data management operations, irrespective of the method and device used to implement the operations and the place of application, provided that the technical task is carried out on the data;
18. **data processor:** a natural or legal person or an organization without legal personality who, on the basis of a contract, including a contract concluded under the provisions of the law, processes data;
19. **data controller:** a public service body that has produced publicly available information that is compulsory by electronic means and whose data has been generated during its operation;
20. **data communicator:** a public service body which, if the data controller does not publish the data itself, publishes the data provided to him by the data controller on a website;
21. **data pool:** the totality of data processed in one register;
22. **third party:** a natural or legal person or a non-legal entity which is not the same as the data subject, the data controller or the data processor;
23. **EEA state:** a Member State of the European Union and a State party to the Agreement on the European Economic Area, and a State which is a national of an international agreement concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area, Shall enjoy the same status as a national of a State Party to the Agreement on the European Economic Area;
24. **third country:** any state other than an EEA State;
25. **compulsory organizational arrangements:** an internal data protection policy that is compulsory for data controllers or data controllers, approved by the National Data Protection and Information Authorities (hereinafter referred to as the Authority), which is active in several countries, including at least one EEA or a group of data controllers or data controllers which, in the case of data transmission to a third country, provides for the protection of personal data by means of a unilateral undertaking by the data controller or data controllers;
26. **privacy incident:** the unauthorized processing or processing of personal data, in particular unauthorized access, alteration, transmission, disclosure, deletion or destruction and accidental destruction or damage.
27. **minor:** one who has not reached the age of eighteen. A minor becomes of age with marriage.

### III. Principles

Personal data may only be handled for a specific purpose, for the exercise of the right and for the fulfilment of the obligation. At all stages of data management, the purpose of data management must be met, the recording and handling of data must be fair and legitimate.

Only personal data that is essential for achieving the purpose of data management can be handled to achieve this goal. Personal data can only be handled to the extent and for the duration required to achieve the goal.

Personal data preserves this quality while handling it as long as its relationship can be restored with the affected person. The contact can restore the connection if the data controller has the technical conditions that are necessary for restoration.

Data management shall ensure the accuracy and completeness of the data and, where necessary for the purposes of data management, the updating of the data and the identification of the data subject for the time necessary for the purpose of data management.

The processing of personal data shall be considered as fair and lawful if, in order to ensure that the person concerned is able to express his / her freedom of expression, a person wishing to become acquainted with the person concerned will visit the resident or residence of the person concerned provided that the personal data of the person concerned are handled in accordance with the provisions of this Act and that personal request is not for business purposes directed. The personal request can not be made on a public holiday on the basis of the Labour Code.

### IV. Contribution to data management

Personal data handling is legally effective if the person expressly agrees. The legal basis for handling the recorded data is the voluntary contribution of the affected persons pursuant to Article 5 (1) (a) of Info Law or the natural identity data required for the identification of the customer's customer and the address of the customer, Law 13 / A. § is based on the provisions of the Act.

The validity of the declarations of a natural person who is under 18 years of age and of other acts of attorney under the custody of a person who is not under the age of 18 must also be approved by their legal representative.

Csaviar does not pass on the personal data collected to a third party other than a legally authorized authority, and in particular does not do so for consideration (excluding database exclusion).

In any case, Csaviar acquires personal data only directly from the data owner, so the source of the data is in any case the person concerned.

Csaviar does not handle special data.

Csaviar hereby informs those concerned that Info Law, that if the personal data were collected with the consent of the

person concerned, the recorded data were not provided for by law unless otherwise provided for by law, in order to fulfill its legal obligation or to enforce the legitimate interests of the data controller or third party, it is proportionate to the limitation of the right to the protection of personal data - you can manage it without further special consent and after withdrawing your consent.

Customer declares and confirms that he / she is aware of this Notice by signing up and using the webshop or using any other online or offline sales channels, and acknowledging its provisions as compulsory. By registering with the webshop and/or in any of the physical shops of Csaviar, customer agrees that the Data Manager may provide the personal information of the customer voluntarily (name, address, e-mail address, telephone number) and the purchased product. information about other purchasing information (place and time of purchase, purchased products, purchase value) - collectively: Data - uses for the following purposes: the purpose of data management is to create and fulfill a contract under this contractual terms and to enforce claims.

The purpose of the data management is primarily to secure the conclusion, performance and enforcement of the contract by using the webshop, and to protect the client's rights, in the alternative, the compilation of other services, statistics and the technical or quality improvement of the IT system. The purpose of data processing for statistical purposes, ie the production of statistics, can only be achieved in order to achieve the primary objectives of the system or to improve the technical or qualitative development of the IT system. The customer can write the quality management data at any time by e-mail at [webshop@Csaviar.hu](mailto:webshop@Csaviar.hu).

Customer expressly and with due care acknowledges that the Csaviar system may collect data on the activity of users that can not be linked to other data provided by users during registration or any other data generated by the use of web sites or services.

Csaviar Ltd. will send a newsletter, special offers, and notifications about the appearance of new products based on the customer's consent. The customer is entitled to revoke this consent at any time and also acknowledges the customer's Csaviar information that it is possible to unsubscribe from newsletters in the newsletters sent by the Data Handler. In that case, Csaviar will not send to the user any newsletters or other advertising letters after the withdrawal of the consent or deletes the data of that user from the data of the subscribed users of the newsletter.

A newsletter can only be disclosed if the recipient of the newsletter has given prior and unambiguous consent to the withdrawal of the consent by the customer at Csaviar's statement at any time. To send the newsletter, the customer will give his consent when registering in the webshop.

The customer may request information about the processing of his or her personal data, and may request the rectification of his or her personal data and the deletion of this information in accordance with this Privacy Policy.

## **V. Duration of the data handling**

Personal data can be handled only to the extent and time needed to fulfill the original objective of the agreement, and only data that is essential for achieving the purpose of data management and achieving the goal can be handled. Personal data is handled by registering in the webshop or applying for other services such as Product Inquiry, Loyalty Program etc., personal data will be stored until the purpose of data management is realized or the customer does not request the deletion. The length of time the personal data indicated on the documents to be kept under the Accounting Act are the same as the retention period prescribed by the Accounting Act. Info Law. in case of deletion, the data previously provided by Csaviar becomes unrecognizable in such a way that their restoration is no longer possible. If the customer requests the deletion of the treated personal data, the registration will be canceled at the same time as this request is made.

## **VI. Data Security**

Csaviar will do its utmost to prevent and eliminate the unauthorized access or access of the personal data it manages. At the same time, due to the rapid evolution and change of information technology, and given that the dangers arising from the features of information technology can not be completely ruled out, a third party may have access to Csaviar's unauthorized activity, personal data processed by them, they are scanned or otherwise misused. Csaviar is not liable for any damages resulting from this illegal activity and for misuse of personal data that has been obtained in such a way by third parties.

## **VII. Remedies**

According to Info Law, customers may request information on the handling of their personal data, and may request any personal data of theirs to be modified, locked or deleted.

Any questions, requests for information or complaints regarding Csaviar's data handling management are only accepted in a written format, sent by registered postal mail.

The request must be in writing and must contain the following:

- Your name and postal address.
- Details of your question, request or complaint.

You must also provide:

- A photocopy of your ID card, passport or driving licence, so that we can verify your identity.
- Your signature and the date of the request.
- If you are applying on behalf of another person then signed authority from the individual is required.

Please send your request tracked and registered mails to:

Magyar Dolgozók Szociális Szövetkezet  
[1027 Budapest, Frankel Leó út 10.\)](#)

**(a)** where the processing or transmission of personal data is necessary solely for the fulfilment of a legal obligation for the data controller or to enforce the legitimate interests of the data controller, data entrant or third party, except in the case of mandatory data processing;

**b)** the use or transfer of personal data is done for direct business acquisition, polling or scientific research; as well as

**c)** in other cases specified by law.

The data controller shall examine the protest within the shortest time, but within 15 days of the submission of the request, decide on the matter of its validity and inform the applicant in writing.

If the data handler establishes the validity of his / her protests, data management, including further data collection and data transfer, will terminate and lock the data, and inform the protest and the measures taken on the basis of those who have previously transferred the personal data involved in the protest, and who are obliged to take action to enforce the right to protest.

If the data subject does not agree with the decision of the data controller or if the data controller fails to comply with the statutory deadline, the person concerned may refer the case to the court within 30 days from the notification of the decision or from the last day of the deadline.