

DATA PRIVACY POLICY

The purpose of this data privacy policy (the "**Policy**") is to provide you with prior and clear information about the processing of personal data by **ParisLeaf Korlátolt Felelősségű Társaság** (registered office: 1111 Budapest, Lágymányosi utca 12. fszt. 12) as the data controller (the "**Data Controller**") on the Webshop www.parisleaf.net (the "**Webshop**") operated by the Data Controller.

1. Data controller and its contact details

Name of Data Controller: **ParisLeaf Korlátolt Felelősségű Társaság**
Registered office: 1111 Budapest, Lágymányosi utca 12. fszt. 12
Address for correspondence: 1111 Budapest, Lágymányosi utca 12. fszt. 12
Registration number: 01-09-408691
E-mail address: info@parisleaf.net
Telephone number: +36704240695
Webshop: www.parisleaf.net

2. Definitions

- **data control**: shall mean any operation or set of operations that is performed upon personal data, whether or not by automatic means, such as in particular collection, recording, organization, separation, storage, adaptation or alteration, query, inspection, use, retrieval, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction
- **data controller**: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law
- **data processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **personal data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- **consent' of the data subject** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **restriction of processing** means the marking of stored personal data with the aim of limiting their processing in the future;
- **filig system** means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- **personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

3. Principles relating to the processing of personal data

The Controller is responsible for compliance with the following principles and must be able to demonstrate such compliance.

1) Lawfulness, fairness and transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject

2) Purpose limitation

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes

3) Data minimisation

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

4) Accuracy

Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay

5) Storage limitation

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of the data subject

6) Integrity and confidentiality

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

The Data Controller declares that its processing will be carried out in accordance with the provisions of this clause.

4. The Data Controller summarises the legal basis for each of its data processing, the purpose of the data processing, the data subjects, the scope of the data processed and the duration of the data processing in the table below:

Data(s) processed	Data processing	Data subjects	Legal basis	Duration of data processing	Purpose of data processing
Username, password, first and last name	Registration	All natural persons who register on the Webshop	Your voluntary consent [processing under Article 6(1)(a) GDPR]	Until your consent is withdrawn. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its	Identification, secure login to user account

				withdrawal	
Full name, address, telephone number, e-mail address, characteristics of the product purchased, order number and date of purchase	Data related to placing and processing an order in the Webshop	All natural persons who purchase a product from the Data Controller's Webshop as a customer	Performance of the contract. [Processing under Article 6(1)(b) GDPR]	The duration of the contract and for the purposes of enforcing any claims of the Data Controller arising from the contract and defending against any claims of you as the buyer, the period of 5 years after the termination of the contract pursuant to Article 6:22 (1) of the Civil Code	Fulfilling your order, clarifying questions about your order, contacting you
Billing name, billing address, e-mail address	Issuing an invoice	Any natural person who purchases a product on the website of the Data Controller as a customer	Processing is necessary for compliance with a legal obligation to which the Data Controller is subject. Processing pursuant to Article 6(1)(c) GDPR	Invoices issued must be kept for 8 years from the date of issue in accordance with Section 169 of the Accounting Act	Issuing invoices and fulfilling the obligation to keep accounting records, reconciling invoicing

					issues
Delivery name, delivery address, e-mail address, telephone number	Transport-related data processing	Any natural person who purchases a product on the website of the Data Controller as a customer	Performance of the contract. [Processing under Article 6(1)(b) GDPR]	The Data Controller processes the data for the duration of the delivery of the ordered product.	Delivery of the ordered product, coordination of delivery issues
- Name and address - personal data concerned by the complaint	Consumer complaint handling	All data subjects who purchase a product from the Data Controller's Webshop and who lodge a complaint	The legal basis for the processing is the fulfilment of the legal obligation of the Data Controller under Article 6(1)(c) of the GDPR, as set out in the Civil Code and the legislation on consumer complaints.	<i>The Data Controller must keep a record of the complaint and a copy of the response for 3 years.</i>	It is used to handle consumer protection complaints
- Name and address of the consumer; - name of the product purchased and purchase price - the date of performance of the contract by the Data Controller, - the date of	Handling warranty and guarantee claims	All purchaser who shops and complain on the Webshop	The legal basis for data processing is the fulfilment of the legal obligation of the Data Controller under Article 6(1)(c) of the GDPR, as set out in the Civil Code and the legislation on warranties and	The Data Controller shall keep the record of the warranty or guarantee claim for 3 years from the date of its recording.	Fulfilment of warranty and guarantee claims

notification of the defect, - the description of the defect,			guarantees.		
Name, e-mail address	Newsletter, DM data management	All person subscribed to the newsletter	Your voluntary consent [processing under Article 6(1)(a) GDPR)	<p>Until your consent is withdrawn, i.e. until you unsubscribe from the newsletter. You can unsubscribe from the newsletter at any time, immediately by using the link at the bottom of each newsletter sent or by using other contact details of the Data Controller.</p> <p>Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to withdrawal</p>	<p>Promoting and advertising the products on the Webshop ; sending e-mail newsletters, product catalogues and offers to the data subjects, including commercial advertising.</p>

In the event that the Data Controller intends to carry out further data processing in addition to the above, it shall provide prior information on the essential circumstances of the processing, i.e. the legal basis of the processing, the purpose of the processing, the data subject, the scope of the data processed and the duration of the processing.

5. Information on the use of data processors

The Data Controller currently uses the following data processors:

5.1. Data processor activities related to the provision of hosting services

Name of the hosting service provider: **Bluehost**

Location of the hosting service provider: 1500 N Priest Dr Suite 200, 2nd Floor, Tempe, AZ 85281, United States

Hosting Provider's Telephone Number: +18017659400

Hosting Provider's website: www.bluehost.com

5.2. Data processing activities related to payment

Data processor name: OTP Mobil Kft.

Data processor's registered office: 1143 Budapest, Hungária körút 17-19.

You acknowledge that the following personal data stored by the Data Controller in the user database of the Webshop will be transferred to OTP Mobil Kft. as data processor.

The data transmitted by the Data Controller are the following: name, email address, phone number, billing address, shipping address

The nature and purpose of the data processing activities carried out by the data processor can be found in the SimplePay Data Processing Information Notice at the following link: <http://simplepay.hu/vasarlo-aff>

5.3. Data processing activities related to transport

5.3.1. Name of the data processor: DPD Hungary Korlátolt Felelősségű Társaság

Registered office of the data processor.

Data Processor's company registration number: 01-09-888141

E-mail address of the data processor: dpd@dpd.hu

Data Processor telephone number: +36 1 501 6200

Personal data transmitted: name, address, name of goods ordered, quantity.

Purpose of the data transmission: to enable the delivery of the goods ordered by the customer and to enable the customer to manage and communicate with the seller.

- 5.3.2. Name of the data processor: RapidLog NKR 2022 Logisztikai Korlátolt Felelősségű Társaság
Registered office of the Data Processor.
Data Processor's company registration number: 13-09-218653
E-mail address of Data Processor: info@rapidlog.hu
Data Processor telephone number: 06 30 381 8320
Personal data transmitted: name, address, name of goods ordered, quantity.
Purpose of the data transmission: to enable the delivery of the goods ordered by the customer and to enable the administration and communication of the goods.

6. Rights of the data subjects

A. THE DATA SUBJECT'S RIGHT TO INFORMATION

The Data Controller shall provide You with the following information: the identity and the contact details of the Data Controller and of the Data Controller's representative, the contact details of the data protection officer of the Data Controller (if any), the purposes of the data processing activities for which the personal data are intended as well as the legal basis for the data processing the categories of personal data concerned, the recipients or categories of recipients of the personal data, if any; where applicable, that the Data Controller intends to transfer personal data to a recipient in a third country or international organisation, the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period; where the data control is based on balance of interest, the legitimate interests pursued by the Data Controller and/or third party, the right to lodge a complaint with a supervisory authority; from which source the personal data originate, and if applicable, whether it came from publicly accessible sources, the existence of automated decision-making, including profiling and in these cases about the meaningful information about the logic involved,

B. RIGHT OF ACCESS BY THE DATA SUBJECT

You shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning You are being processed, and, where that is the case, access to the personal data and the following information:

- o the purposes of the data control;
- o categories of personal data concerned;

- o the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- o where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- o the existence of the right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such data control;
- o the right to lodge a complaint with a supervisory authority;
- o where the personal data are not collected from the data subject, any available information as to their source;
- o the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

C. RIGHT TO RECTIFICATION AND TO ERASURE

You shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning. Taking into account the purposes of the data processing, You shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

The Data Controller shall have the obligation to erase personal data without undue delay upon your request:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise controlled;
- You withdraw your consent on which the data control is based and where there is no other legal ground for the data control;
- You object the data processing and there are no overriding legitimate grounds for the processing, or You object the data processing for direct marketing purposes;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services provided to children.

The Data Controller shall communicate any rectification or erasure of data control to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate

effort. The Data Controller shall inform You about those recipients if You request it.

D. RIGHT TO RESCTRICTION OF DATA CONTROL

The Data Controller shall restrict the data processing upon your request if:

- the accuracy of the personal data is contested by You, for a period enabling the Data Controller to verify the accuracy of the personal data;
- the data control is unlawful and You oppose the erasure of the personal data and request the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the data processing but they are required by You for the establishment, exercise or defence of legal claims;
- You have objected to data control carried out on the basis of legitimate interest or public interest, the verification whether the legitimate grounds of the controller override those of yours.

The Data Controller shall communicate any restriction of data control to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform You about those recipients if You request it.

E. RIGHT TO DATA PORTABILITY

You shall have the right to receive the personal data concerning You, which You have provided to a Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the Data Controller to which the personal data have been provided, where:

- the data processing is based on consent or on a contract pursuant to the GDPR
- the data control is carried out by automated means.

F. RIGHT TO OBJECT

You shall have the right to object, on grounds relating to your particular situation, at any time to data processing of personal data concerning You which is carried on the basis of legitimate interest or public interest, including profiling based on those provisions. The Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the data processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, You shall have the right to object at any time to processing of personal data concerning You for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where You object to data processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

G. AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning You or similarly significantly affects You. In these cases, the Data Controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision

The above shall not apply if the decision:

(a) is necessary for entering into, or performance of, a contract between You and a Data Controller;

(b) is authorised by Union or Member State law to which the Data Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or

(c) is based on Your explicit consent.

No automated decision-making or profiling is carried out by the Data Controller through the Webshop.

7. Framework for the exercise of rights

The Data Controller shall inform You, without undue delay and in any event **within one month** of receipt of the request, of the action taken in response to the request concerning your rights listed in Section 6 of this Policy. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by further two months. The Data Controller shall inform you of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If you have made the request by electronic means, the information shall be provided by electronic means where possible, unless you request otherwise.

If the Data Controller does not act on your request, it shall inform you without delay and at the latest within one month of receipt of the request of the reasons for non-action, of the possibility to lodge a complaint with the competent data protection supervisory authority (National Authority

for Data Protection and Freedom of Information, see contact details in Section 8) and of your right to judicial remedy.

8. Your remedies

A. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedies, You have the right to lodge a complaint with the supervisory authority if you consider that the processing of personal data concerning you infringes the GDPR.

Name and contact details of the supervisory authority:

National Authority for Data Protection and Freedom of Information

1055 Budapest, Falk Miksa utca 9-11.

Tel: +36 1 391 1400

Fax: +36-1-391-1410

Email: ugyfelszolgalat@naih.hu

Webshop: <http://naih.hu>

B. Right to an effective judicial remedy against the supervisory authority

Without prejudice to other administrative or non-judicial remedies, You have the right to an effective judicial remedy against a legally binding decision of the supervisory authority which is addressed to You. You have the right to an effective judicial remedy if the supervisory authority does not deal with the complaint or does not inform You within three months of the procedural developments concerning the complaint or of the outcome of the complaint.

C. Right to judicial remedy

Without prejudice to your right to lodge a complaint, You have the right to an effective judicial remedy if You consider that your rights under the GDPR have been infringed as a result of the improper processing of your personal data.

Proceedings must be brought before the competent court in the place where the Data Controller is established. If You do not have your habitual residence in Hungary, such proceedings may, at your choice, be brought before the courts of the Member State where You have your habitual residence.

9. Management of cookies (cookies)

The Data Controller uses so-called cookies when You visit the Webshop. When You visit the Webshop, a small data file called a cookie (hereinafter referred to as a "cookie") is placed on your computer.

Please note that most internet browsers accept and allow the setting and use of cookies by default, but with the appropriate browser settings You can refuse, restrict or block the use of cookies and delete cookies that have already been stored.

Data subjects concerned by the use of cookies: visitors and users of the Webshop.

Duration of processing: we distinguish between cookies that are stored until the end of a session and cookies that are stored for a fixed, longer period of time.

Cookie	Duratio n	Leírás
woocommerce_cart_hash	session	Helps to determine when cart contents/data changes.
woocommerce_items_in_cart	session	Helps to determine when cart contents/data changes.
wp_woocommerce_session_	2 days	Contains a unique code for each customer so that it knows where to find the cart data in the database for each customer.
woocommerce_recently_viewed	session	Powers the Recent Viewed Products widget .
store_notice[notice id]	session	Allows customers to dismiss the Store Notice.
woocommerce_snooze_suggestions_[suggestion]	2 days	Allows users to dismiss Market place

		suggestions, if enabled.
woocommerce_dismissed_suggestions__[context]	1 month	Count of suggestion dismissals, if enabled.
tk_ai	session	Collects information about the use of the website to improve the user experience

10. Management of personal data breach by the Data Controller

In the case of a personal data breach, the Data Controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the National Authority for Data Protection and Freedom of Information, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

The Data Controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

The Data Controller shall inform the data subject of the personal data breach without undue delay where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons.

The communication to the data subject referred to above shall not be required if any of the following conditions are met:

- o the Data Controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- o the Data Controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialise;
- o it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner

11. Amendment of the Policy

The Data Controller reserves the right to unilaterally amend this Policy. Amendments to this Policy shall enter into force upon publication on the Webshop.

12. Final provisions

In matters not regulated by the Policy, the provisions of the GDPR and the Act CXII of 2017 on the Right of Informational Self-Determination and on Freedom of Information shall be applied.