

Privacy Policy Effective: 2025.09.25.

This document contains all relevant information regarding data processing related to the operation of the webshop, pursuant to Regulation (EU) 2016/679 of the European Union (hereinafter: GDPR) and Act CXII of 2011 (hereinafter: Infotv.).

Data Controller name: RMW Épületkomfort Kft.

Registered office, mailing address: 2161 Csomád, Akácos utca 15.

Company registration number: 13-09-196855

Tax number: 26545628-2-13

Contact:

E-mail: <u>info@futoablak.hu</u> Phone: +36-70/650-3070 Website: https://futoablak.hu

Hosting provider: **DotRoll Kft.**

Mailing address: 1148 Budapest, Fogarasi út 3-5. Company registration number: 01-09-882068

Tax number: 13962982-2-42 E-mail: support@dotroll.com Phone: +36-1/432-3232

Website: https://dotroll.com/hu

1. Description of Data Processing Conducted During Webshop Operation

Information regarding the use of cookies

1.2. What is a cookie?

The Data Controller uses so-called cookies when visiting the website. A cookie is a package of information consisting of letters and numbers, sent by the Controller's website to the User's browser to save certain settings, facilitate the use of the website, and help collect statistical, relevant information about users.

Some cookies do not contain personal information and are not suitable for identifying the individual user, but some contain individual identifiers—a secret, randomly generated number sequence—which is stored by the User's device and ensures identification. The operation period of each cookie is specified in their respective descriptions.

1.3. Legal Background and Legal Basis for Cookies

The legal basis for data processing is the legitimate interest of the controller under Article 6 (1) f) of the GDPR. Thus, in this case, the data subject's consent is not needed, only appropriate information must be provided, and the processing must be limited to the time and scope necessary to achieve the purpose (for session cookies, this means until the end of the session, i.e., browser closure).

The legal basis may also be the User's consent, under Article 6 (1) a) of the GDPR, in line with §155 (4) of the 2003 Act C on Electronic Communications.



2. Data Processed for Contract Conclusion and Performance

Multiple data processes may occur for the purpose of contract conclusion and performance. Data processing related to complaints and warranty administration only occurs if the User exercises such rights. If the User does not make a purchase, only visits the webshop, processing described for marketing purposes may apply if the User consents to marketing.

2.1. Website Registration

By storing the data submitted at registration, the Controller can offer more convenient services (e.g., the user does not need to re-enter data for further purchases). Registration is not a prerequisite for contract conclusion.

Data processed: name, address, phone number, email, product details, date of purchase.

Duration: Until withdrawal of consent.

Legal basis: Voluntary consent, given at registration [GDPR 6 (1) a)].

2.2. Order Processing

Data processing is required for order fulfillment.

Data processed: name, address, phone number, email, product details, order number, date of purchase.

If the User places an order, the provision of data and processing is necessary for contract performance.

Duration: Five years according to the civil statute of limitations.

Legal basis: Contract performance [GDPR 6 (1) b)].

2.3. Issuing Invoices

Data processing is conducted to issue legally compliant invoices and fulfill accounting documentation retention obligations. According to Sztv. 169. § (1)-(2), companies must keep documents directly or indirectly supporting accounting records.

Data processed: name, address, email, phone number.

Duration: Eight years from invoice issuance as required by Sztv. 169. § (2).

Legal basis: Required by law [GDPR 6 (1) c)], 2007 Act CXXVII. 159. § (1), and 2000 Act C. 169. § (2).

2.4. Data Processing Related to Product Delivery

Data processing is conducted for the shipping of ordered products.

Data processed: name, address, email, phone number.

Duration: Until shipment is completed.

Legal basis: Contract performance [GDPR 6 (1) b)].

2.5. Data Access and Transmission

Employees of the Controller are allowed to access personal data within their roles. Data will only be forwarded to other official bodies as required by law (e.g., police or prosecution requests).

3. Warranty Administration

Data processing is conducted for managing warranty claims. If the User requests warranty service, provision and processing of the data is mandatory.



Data processed: name, phone number, email, complaint content.

Duration: Five years based on consumer protection law.

Legal basis: Voluntary decision to contact us; if so, we are required under 1997 Act CLV.

17/A. § (7) to retain the complaint for three years [GDPR 6 (1) c)].

3.1. handling other consumer complaints

Data processing is conducted to manage other consumer complaints.

Data processed: name, phone number, email, complaint content.

Duration: Five years per the consumer protection law.

Legal basis: Voluntary to submit complaints, but if so, retention is legally mandated [GDPR 6 (1) c)].

4. Data Processing for Marketing Purposes

Under 2008 Act XLVIII. §6, the User may expressly consent in advance to allow the Service Provider to contact them with advertising offers and other materials via provided contact methods.

Further, with due consideration of this policy, the Customer may consent to the processing of personal data necessary for sending marketing offers.

The Service Provider does not send unsolicited advertising. If prior consent is given, the User may revoke consent without limitation or explanation; in this case, all data related to sending advertisements is deleted and the User will not receive further advertisements. Unsubscribing is available via link in each message.

5. User Rights During Data Processing

Within the data retention period, the User has rights under GDPR, including:

- Withdraw consent
- Access personal data and information relating to processing
- Right to rectification
- Restriction of processing
- Right to deletion
- Right to object
- Right to data portability

To exercise these rights, identification may be required (only on data already held about the User). Complaints related to data processing will be stored in the Controller's email account for the retention period specified above. If making a complaint or warranty claim, please provide your order ID for correct identification.

Data-related complaints will be answered within 30 days at the latest.

6. Data Security Measures

The Controller declares it has taken security measures to protect personal data against unauthorized access, alteration, transmission, publication, deletion, destruction, accidental loss or damage, and unavailability due to technology changes.



The Controller makes all reasonable efforts to ensure processors handling personal data also take proper measures.

7. Legal Remedies

If the User feels the Controller has violated data processing laws or failed to meet a request, they may initiate an investigation by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH, mail: 1363 Budapest, Pf.: 9., email: ugyfelszolgalat@naih.hu).

Lawsuit in civil court can also be initiated against the Controller.

8. Modifications to this Privacy Policy

The Controller reserves the right to modify this Policy in ways that do not affect the purpose and legal basis of data processing. By using the website after changes come into force, Users accept the revised policy. If data will be processed for any new purpose, the User will be informed in advance about:

- Duration (or criteria) of data storage
- Rights to access, correct, delete, restrict processing, object (in legitimate interest cases), and data portability
- That consent can be withdrawn any time (for consent-based processing)
- Right to submit a complaint to the supervisory authority
- Whether providing data is law- or contract-based, a requirement for entering a contract, or what happens if not provided
- Whether automated decision-making/profiling is used, its logic, likely consequences, and significance

Processing for new purposes will only begin after this information is provided and, for consent-based processing, with user consent.