

### Introduction

In the course of operating the website, KOMPRESS Kft. processes the data of the persons registered at www.kompress.hu in order to provide them with adequate services.

The service provider intends to achieve full compliance with the statutory requirements for the processing of personal data, in particular the provisions of Regulation (EU) No 2016/679 of the European Parliament and of the Council.

This present data processing information note has been compiled based on Regulation (EU) No 2016/679 of the European Parliament and the of Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, taking into consideration also the content of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

#### Name of Service Provider, Controller:

Name/Company name: KOMPRESS Kft.

Company seat: H–2900 Komárom, Vállalkozók útja 8.

Tax number: 11181781-2-11

Registration number (NAIH): We do not have a registration number, because

our Company does not pursue any data processing

activities subject to a notification obligation

Name and address of website: www.kompress.hu

Availability of the data

processing information note: www.kompress.hu

#### Contact details of controller:

Name/Company name: KOMPRESS Kft.

Company seat: H–2900 Komárom, Vállalkozók útja 8.

Mailing address: H-2901 Komárom, P.O. Box: 215

E-mail: info@kompress.hu

Telephone: +36 34 540 650



KOMPRESS Nyomdaipari Kft. - a printing & packaging house

H-2900 Komárom, Vállalkozók útja 8

Tel.: +36 34 540 650  $\cdot$  Fax: +36 34 540 660  $\cdot$  E-mail: info@kompress.hu

# **Definition of concepts**

- **GDPR** (General Data Protection Regulation) is the new Data Protection Regulation of the European Union,
- data processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction,
- data processor: the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller,
- **personal data:** 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,
- **controller:** 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,
- **consent of the data subject:** 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,
- **personal data breach:** 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,
- recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing,
- **third party:** a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.



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# **Data processing policy**

The controller declares that it manages the processing of personal data as set out in the Data Processing Information Notice and complies with the specifications set forth in the applicable legal regulations, with special regard to the following:

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

Personal data shall only be collected for specified, explicit and legitimate purposes.

The purpose of processing personal data shall be adequate, relevant and limited to the necessary extent.

Personal data shall be accurate and up-to-date. Inaccurate personal data shall be erased forthwith.

Personal data shall be kept in a form which permits identification of data subjects for no longer than it is necessary. Personal data may only 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.

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

The principles of data protection shall be applied to any information concerning an identified or identifiable natural person.



# Important data processing related information

The purpose of data processing is to enable the service provider/controller to provide adequate additional services for the persons registered at the website during the operation of the website.

The legal basis of data processing is the consent of the data subject.

The scope of people subject to data processing is the registered users of the website. Duration of data processing and erasure of data. The duration of the data processing is always the function of the specific purpose of the user, however, the data shall be deleted forthwith if the originally targeted purpose has already been achieved. The data subject is entitled to withdraw his or her consent to data processing at any time by means of a letter sent to the contact e-mail address. If the erasure has no legal impediment, then the data of the data subject will be erased.

The controller and its employees are entitled to gain knowledge of the data.

The data subject is entitled to apply to the data controller for access to, correction, erasure or limitation of access to personal data concerning the data subject and is also entitled to object to processing, as well as to the portability of such personal data of the data subject.

The data subject is entitled to withdraw his or her consent to data processing at any time, however, this shall not affect the lawfulness of data processing performed based on the aforementioned consent prior to the withdrawal thereof.

The data subject is entitled to submit a complaint addressed to the supervisory authority.

If the data subject intends to use the benefits provided by the registration, i.e., to use the relevant services of the website, it is necessary to provide the personal data requested. The data subject is not obligated to provide his or her personal data, the omission of providing the data supply shall not mean any disadvantages for the data subject. However, accessing certain functions of the website is not possible without registration.

The data subject shall be entitled to request the controller to rectify or supplement any inaccurate personal data appertaining to the data subject without undue delay.

The data subject shall be entitled to request the controller to erase any inaccurate personal data appertaining to the data subject without undue delay, and the controller shall be obligated to erase the personal data appertaining to the data subject without undue delay, if there is no other legal basis for processing the data.

Modification or erasure of personal data may be initiated via e-mail, over the telephone or in a letter at the contacts as stated above.



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## Registration at the website

The purpose of data processing is to provide extra service and getting into contact.

The legal basis for the registration data processing is your consent.

The scope of people subject to data processing is the registered users of the website.

Duration of data processing. Data processing is performed until the withdrawal of the consent. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address.

The data are erased upon the withdrawal of the consent to data processing. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address.

The controller and its employees are entitled to gain knowledge of the data.

The method of data storage is: electronic.

Modification or erasure of personal data may be initiated via e-mail, over the telephone or in a letter at the contacts as stated above.

The provision of personal data is absolutely necessary for the identification in databases and keeping contact. The accurate company name and address are necessary for invoicing, which is a legal obligation.

#### Scope of data processed Specific purpose of data subject to data processing

Name Identification, keeping contact, invoicing.

Company name Identification, keeping contact, invoicing.

Address Identification, keeping contact, invoicing.

E-mail: Identification, keeping contact.

Telephone Identification, keeping contact.

Registration time Technical informational operation.

IP address Technical informational operation.

The user may provide the consent to data processing by deliberately ticking the checkbox which is on the website and expressly serves for the aforementioned purpose.

You, as the data subject, are entitled to object to processing your personal data and in this respect you are entitled to the procedure in conformity with the data processing information detailed hereinabove and this present information note, as well as the legislative provisions described in this present information note.



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# **Submitting the order**

The purpose of data processing is to provide extra service, get into contact and send a confirmation e-mail. We can only perform your order if you provide your contact and invoicing related data, which are absolutely necessary for keeping contact and invoicing.

The legal basis for data processing is your consent. In the case of invoicing, data processing is based on a legal regulation.

The scope of people subject to data processing is the registered users of the website.

Duration of data processing. Data processing is performed until the withdrawal of the relevant legal regulation or the consent. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address.

The data are erased upon the withdrawal of the consent to data processing. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address. The invoicing data may be erased in conformity with the legal regulations.

The controller and its employees are entitled to gain knowledge of the data.

The method of data storage is: electronic.

Modification or erasure of personal data may be initiated via e-mail, over the telephone or in a letter at the contacts as stated above.

Scope of data processed Specific purpose of data subject to data processing

NameIdentification, keeping contact, invoicing.Company nameIdentification, keeping contact, invoicing.AddressIdentification, keeping contact, invoicing.

E-mail: Identification, keeping contact.

Telephone Identification, keeping contact.

Data of the product ordered: The identification of the product.

Registration time Technical informational operation.

IP address Technical informational operation.

The user may provide the consent to data processing by deliberately ticking the checkbox which is on the website and expressly serves for the aforementioned purpose.

The data subject is entitled to object to processing his or her personal data and in this respect the data subject is entitled to the procedure in conformity with the data processing information detailed hereinabove and this present information note, as well as the legislative provisions described in this present information note.



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# Issuing the invoice

The purpose of data processing is to issue an invoice and send it as an e-mail attachment. The legal basis for data processing is compulsory data processing based on a legal regulation.

The scope of people subject to data processing is the buyer partners of the service provider.

Duration of data processing. Data processing is performed until the withdrawal of the legal regulation or the consent. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address.

The data are erased upon the withdrawal of the consent to data processing. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address. The invoicing data may be erased in conformity with the legal regulations.

The controller and its employees are entitled to gain knowledge of the data.

The method of data storage is: electronic.

Modification or erasure of invoicing data may be initiated via e-mail, over the telephone or in a letter at the contacts as stated above.

Scope of data processed	Specific purpose of data processing
Name	Identification, keeping contact, invoicing.
Company name	Identification, keeping contact, invoicing.
Address	Identification, keeping contact, invoicing.
E-mail:	Identification, keeping contact.

Tax number /

**Telephone** 

**Account data**The identification of the buyer.

The identification of the account.

**Date of issuing the invoice** Technical informational operation.

The user may provide the consent to data processing by deliberately ticking the checkbox which is on the website and expressly serves for the aforementioned purpose.

Identification, keeping contact.

The data subject is entitled to object to processing his or her personal data and in this respect the data subject is entitled to the procedure in conformity with the data processing information detailed hereinabove and this present information note, as well as the legislative provisions described in this present information note.



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# **Sending newsletters**

As the operator of the website, we declare that we publish all and any information and descriptions in full compliance with the relevant legal provisions. We also declare that when someone signs up for a newsletter we are not in the position of verifying the authenticity of the contact information or to establish whether the data provided appertain to a private person or an undertaking. We treat the undertakings getting into contact with us as customer partners.

The purpose of data processing is to send professional brochures, electronic messages containing advertisements, information, newsletters, of which you can unsubscribe without any consequences at any time. You are also entitled to unsubscribe without any consequences if your undertaking has been terminated or you left the said undertaking, or if someone else has provided us with your contact information.

The legal basis for data processing is your consent. Please note that the user is entitled to provide prior express and explicit consent for the service provider to send promotional offers, information, and other materials for the user at the e-mail address provided at registration. As a result, the user may provide consent for the service provider to process the user's necessary personal data for that purpose.

We kindly inform you that if you intend to receive newsletters from us, then you shall provide the necessary data. We will not be able to send you a newsletter if you fail to provide the necessary data.

Duration of data processing. Data processing is performed until the withdrawal of the consent. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address.

The data are erased upon the withdrawal of the consent to data processing. You are entitled to withdraw your consent to data processing at any time by means of a letter sent to the contact e-mail address.

The consent may also be withdrawn at the link appearing in the newsletters sent out.

The controller and its employees are entitled to gain knowledge of the data.

The method of data storage is: electronic.

Modification or erasure of the data may be initiated via e-mail, over the telephone or in a letter at the contacts as stated above.

Registration number of the controller: We do not have a registration number,

because our Company does not pursue any data processing activities subject

to notification obligation

The data processor employed: data processing is never outsourced

from KOMPRESS Kft. even incidentally



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Scope of data processed Specific purpose of data processing

Name Identification, keeping contact.

E-mail Identification, keeping contact.

Date of subscription Technical informational operation.

IP address Technical informational operation.

We kindly inform you that it is not necessary for either the username or the email address to contain any data referring to personality. For example, it is not necessary for the your username or email address to include your name. You are completely free to decide on entering a user name or email address that contains information about your identity. The email address – which serves for keeping contact – is absolutely necessary so that any newsletter or professional information sent to you will reach you.

#### **Cookies (HTTP cookies)**

Cookies are placed on the user's computer by the websites the user visits and include information, such as page settings or login status.

Cookies are therefore small files created by the websites visited. They improve your user experience by saving your browsing data. Using cookies, the website remembers your website settings and offers locally relevant contents.

The website of the service provider sends a small file (cookie) to the computer of the visitors of the website so that the fact and time of the visit can be verified. The service provider informs the visitor of the website thereof.

The scope of people subject to data processing is the visitors of the website.

The purpose of data processing is providing extra services, identification and tracking the visitors.

Legal base of data management: the consent of the user is not necessary if the use of cookies is absolutely necessary for the service provider

Scope of data: unique identification number, time and date, setting up data.

The user has the option to delete the cookies from browsers in the Settings menu at any time.

Controllers are entitled to gain knowledge of the data. The controller does not process personal data by using cookies.

The method of data storage is: electronic.



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#### Social networking websites

Social networking websites are a media device where messages are distributed through the users. Social media uses the Internet and online publishing options to help users to become content editors from content receivers.

Social media are a surface of web applications which contain user-generated content such as Facebook, Google+, Twitter, etc.

Social media contents may appear in the form of public speeches, lectures, presentations, description of products or services.

Information in social media can appear in the form of forums, blog posts, image, video, audio, contents, message boards, e-mail messages, etc.

Accordingly, the scope of the data processed may also be the public profile image of the user in addition to his or her personal data.

Scope of data subjects: each registered user.

The purpose of the data collection is to promote the website or a connected website.

The legal basis of data processing is the voluntary consent of the data subject.

Duration of data processing: according to the regulations that can be viewed on the relevant social networking site.

Deadline for erasing the data: according to the regulations that can be viewed on the relevant social networking site.

Persons entitled to gain knowledge of the data: according to the regulations that can be viewed on the relevant social networking site.

Data processing related rights: according to the regulations that can be viewed on the relevant social networking site.

The method of data storage is: electronic.

It is important to note that whenever a user uploads or submits any personal information, the user gives a worldwide valid license to the social media site administrator to store and use such content. It is therefore very important to ascertain whether or not the user has full authority to disclose the information published.

## **Google Analytics**

Our website does not use the Google Analytics application.



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## **Data processors**

#### **Hosting service provider:**

Name/Company name: NEBET.HU Kft.

Company seat: H–2900 Komárom, Csillag ltp. 48.

E-mail: info@nebet.hu

Telephone: +36 34 346455

The data provided by you are stored on the server operated by the hosting service provider. Data can only be accessed by our staff or by the server operating personnel but they are all responsible for the safe data procession.

Designation of the activity: hosting, server services.

Purpose of data processing: to ensure the operation of the website.

Scope of data processed: the personal data provided by the data subject.

Duration of data processing and deadline for the erasure of data. The data processing is pursued until the operation of the website, or according to the contractual agreement by and between the operator of the website and the hosting service provider. If necessary, the data subject is also entitled to ask for the erasure of his or her data by contacting the hosting service provider.

The legal basis of data processing is the consent of the data subject, or data processing based on a legal regulation.



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# Data processing related rights

#### Right to request information

You are entitled to ask us to provide information about the kind of data our company processes about you, the legal basis and the purpose of the data processing, as well as the source and the duration of the data processing through the specified contacts. Upon your request, we will notify you by sending a message to the contact e-mail you provide immediately but maximum within 30 days.

#### Right to rectification

You are entitled to ask us to modify any of your data provided by you through the specified contacts. Upon your request, we will take measures and notify you by sending a message to the contact e-mail you provide immediately but maximum within 30 days.

### **Right to erasure**

You are entitled to ask us to erase any of your data provided by you through the specified contacts. Upon your request, we will perform this and notify you by sending a message to the contact e-mail you provide immediately but maximum within 30 days.

#### Right to blocking

You are entitled to ask us to block any of your data provided by you through the specified contacts. Blocking will continue as long as the reason you specify requires the storage of the data. Upon your request, we will perform this and notify you by sending a message to the contact e-mail you provide immediately but maximum within 30 days.

## Right to objection

You are entitled to object to the data processing through the specified contacts. We will examine the objection within the shortest possible time, but not later than 15 days after the submission of the application, then we will make a decision regarding the cogency thereof and inform you of the decision in an e-mail.

## Data processing related right enforcement possibilities

If you experience illegal data processing you are kindly asked to inform our company thereof, so that it will be possible to restore the lawful status within a short period of time. **We will do our best in order to solve the problem outlined for your convenience.** 



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If you consider that the lawful status cannot be restored, you are kindly asked to contact the Authority at the following contact details:

# **Hungarian National Authority for Data Protection** and Freedom of Information

Mailing address: 1530 Budapest, P.O. Box: 5

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Telephone: +36 (1) 391-1400 Facsimile: +36 (1) 391-1410 E-mail: ugyfelszolgalat@naih.hu

URL https://naih.hu

coordinates: N 47°30'56"; E 18°59'57"



H-2900 Komárom, Vállalkozók útja 8

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# Legislation underlying data processing:

**REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL** of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Regulation (EC) No 95/46 / General Data Protection Regulation).

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Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

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Act LXVI of 1995 on Public Records, Public Archives and the Protection of Private Archives Material.

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Government decree no. 335/2005 (XII 29) on the Common Provisions of Document Management in Bodies of Public Administration.

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Act CVIII of 2001 on certain issues of electronic commerce services and information society services

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Act C of 2003 on electronic communication.



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