#### **Privacy Statement**

Name: Laguna Lakástextil Kereskedelmi Kft. Registered Seat: 9700 Szombathely, Minerva u. 3.

Company registration number: 18-09-107040
Tax number: 13861771-2-18

e-mail: <a href="mailto:info@laguna-textil.com">info@laguna-textil.com</a>

Telephone: +36 94 508 710

# **Purpose and Scope of this Statement**

Laguna Lakástextil Kereskedelmi Kft. handles, processes and stores personal data obtained in the course of its activities for the purpose specified by law.

The purpose of the Statement is to define, in compliance with the legal requirements, the order under which records are kept by the controller, as well as to ensure the enforcement of the constitutional principles of data protection, the right to information self-determination and the data security requirements. A further purpose of this Statement is to set out the data protection and processing principles applied by the controller, the Data Protection and Processing Policy of the controller, which it acknowledges to be binding on itself.

The purpose of this Statement is to ensure that operations at Laguna Lakástextil Kereskedelmi Kft. comply with applicable regulatory requirements, ensure the enforcement of fundamental rights related to the protection of personal data specified in the processing regulations, the observance and implementation of data security requirements through the application of and compliance with the provisions of this Statement.

#### **Definitions:**

**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;

**Processing of special categories of personal data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**Processing** means, regardless of the procedure applied, 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 transfer** means making the data available to a specific third party.

**Disclosure** means making the data available to anyone.

**Data erasure** means making data unrecognisable in such a way that data restoration is no longer possible.

**Filing 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;

**Controller** means the person who – alone or jointly with others – determines the purposes and means of the processing.

**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**Data subject** means any natural person identified or identifiable, directly or indirectly, on the basis of personal data.

**Recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

**Third party** means 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;

**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.

**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.

**E-mail** means electronic mail. Its name refers to the method of writing or transmitting, which takes place entirely by electronic means via computer networks.

**Internet** (Internetworking System) is a global system of interconnected computer networks (a so-called meta-network) that connects the entire Earth, connecting government, military, commercial, business, educational, research, and other institutions, as well as individual users.

**Website** means an electronic interface suitable for display and communication of information, which is typically located on servers connected to the Internet (Webserver). These sites, pages, have a unique address (link) that is used to navigate to the given site by typing it into a

browser application. The technology of the websites allows hyperlinks between individual content elements and links (hypertext).

**Cookies** means a component of a programme designed to create convenience features for websites. There are two basic types. One is stored on your own machine, the other is stored on the server side; this is the so-called session cookie. From a processing point of view, the processing of session cookies must be regulated. The websites must inform visitors about the use of cookies and request their consent.

**Electronic newsletter** means information sent to the e-mail address of persons subscribed to the address list, typically created automatically and sent by an application designed for this purpose, for transactional, advertising or other campaign purposes.

### **Principles of Processing**

Laguna Lakástextil Kereskedelmi Kft. is committed to the protection of the personal data of data subjects, and places utmost importance on respecting the right of the data subjects to self-determination. It processes the recorded personal data confidentially in accordance with data protection legislation. In addition, it will take all technical and organisational measures to ensure the secure storage of data.

Personal data may only be processed for a specific purpose, in order to exercise a right and fulfil an obligation. At all stages, data processing must be in accordance with the purpose of data processing, and the collection and processing of data must be fair and lawful.

Only personal data that is essential for the realisation of the purpose of data processing and suitable for the achievement of the purpose may be processed. Personal data may only be processed to the extent and for the time necessary to achieve the purpose.

Personal data retains this quality during data processing as long as its connection with the data subject can be restored. The connection with the data subject can be restored if the controller has the technical conditions necessary for the restoration.

# Possible Legal Bases and Purposes of Processing

Processing shall be lawful only if at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;

- processing is necessary in order to **protect the vital interests** of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the
  controller or by a third party, except where such interests are overridden by the
  interests or fundamental rights and freedoms of the data subject which require
  protection of personal data, in particular where the data subject is a child.

#### **Security of Processing**

The controller is obliged to plan and carry out processing operations in such a way as to ensure the protection of the privacy of the data subjects during the application of legislation and other rules on processing.

The controller and the processor, within the scope of its activity, are obliged to ensure the security of the data, as well as to take the technical and organisational measures and to establish the procedural rules that are necessary for the enforcement of legal regulations.

The data shall be protected by appropriate measures against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as against accidental destruction and damage, and from becoming inaccessible due to changes in the technology used.

In order to protect the data sets processed electronically in the different registers, an appropriate technical solution should ensure that the data stored in the records cannot be directly linked and assigned to the data subject.

The controller and the processor must consider the state of the art when defining and applying data security measures. Of the several possible processing solutions, the one that provides a higher level of protection of personal data must be chosen, unless it would impose a disproportionate burden on the controller.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

The computers, systems, data storage rooms and equipment of Laguna Lakástextil Kereskedelmi Kft. are located at the registered seat of Laguna Lakástextil Kereskedelmi Kft.

According to the state of the art and the best knowledge of Laguna Lakástextil Kereskedelmi Kft., the computers and computer system used can be considered protected from unauthorised access, data theft, data erasure, alteration, accidental destruction and unintentional disclosure.

Laguna Lakástextil Kereskedelmi Kft. ensures the protection of the data in accordance with the technical level available at the given time, and that the data (apart from legal exceptions) cannot be directly linked and assigned to the data subject.

In order to present and advertise the products and services provided, Laguna Lakástextil Kereskedelmi Kft. operates a web interface (website) that belongs to its own domain name.

# Storage of Personal Data Related to the Operation of the Website:

Hosting and server provider: fws online Kft. Address: 9444 Fertőszentmiklós, Petőfi u. 44.

Fws online Kft. stores the data and is not entitled to process them.

The controller declares that appropriate security measures have been taken to protect personal data against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as against accidental destruction and damage, and from becoming inaccessible due to changes in the technology used.

#### Information on the Use of Cookies

What is a cookie?

The controller uses so-called cookies during a visit to the website. A cookie is an information package consisting of letters and numbers that our website sends to your browser for the purpose of saving certain settings, facilitating the use of our website and contributes to collecting some relevant, statistical information about our visitors. Cookies do not contain personal information and are not suitable for identifying an individual user. Cookies often contain a unique identifier - a secret, randomly generated string of numbers - that is stored on your device. Some cookies expire after the website is closed, and some are stored on your computer for a longer period of time.

#### Legal Background and Legal Basis of Cookies:

The background to processing is set out in the provisions of the General Data Protection Regulation (GDPR), Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv) and Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services. The legal basis for processing is Article 6 (1) (f) of the GDPR

for session cookies, Article 6 (1) (a) of the GDPR for other cookies and your consent in accordance with Section 5 (1) (a) of the Infotv.

The Main Features of the Cookies Used by the Website:

**Session cookie:** These cookies are temporarily activated while browsing. That is, from the moment the user opens the browser window until the moment it is closed. As soon as the browser closes, all session cookies are deleted. No personal data is stored in a session cookie. The website uses the following cookie for its operation: YSC, hjTLDTest

Purpose: to record the status of a user while browsing

**Security cookie:** Security cookies are used to authenticate users, prevent the misuse of login information, and to protect user information from unauthorised persons.

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 prepare a report from statistical data about the use of the website without the personal identification of the visitors to Google. The main cookie used by Google Analytics is "\_\_ga, \_gat, \_gid" cookie. In addition to reporting from website 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 Internet. (Processor: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.)

**\_\_Secure-3PSID:** They are used for targeting purposes to profile the interests of visitors to the website and to display relevant and personalised Google ads.

**SIDCC:** It is used to store information about website usage and any advertisements that the data subject may have seen prior to the visit to the website, and to facilitate customising ads on Google properties by remembering recent searches, past interactions with the advertiser's ads, or search results and visitors to an advertiser's website.

**SID:** It is used for security purposes and to store the user's Google Account ID and most recent login time with digital signatures and encrypted records, which allows Google to authenticate users, prevent fraudulent use of login credentials, and protect user data from unauthorised parties. It can also be used for targeting purposes to display relevant and personalised ad content.

**HSID:** It is used for security purposes and to store the user's Google Account ID and most recent login time with digital signatures and encrypted records, which allows Google to authenticate users, prevent fraudulent use of login credentials, and protect user data from unauthorised parties. It can also be used for targeting purposes to display relevant and personalised ad content.

**SSID:** It is used to store information about website usage and any advertisements that the data subject may have seen prior to the visit to the website, and to facilitate customising ads on Google properties by remembering recent searches, past interactions with the advertiser's ads, or search results and visitors to an advertiser's website.

**APISID:** They are used for targeting purposes to profile the interests of visitors to the website and to display relevant and personalised Google ads.

**SAPISID:** They are used for targeting purposes to profile the interests of visitors to the website and to display relevant and personalised Google ads.

\_secure-3PAPISID: They are used for targeting purposes to profile the interests of visitors to the website and to display relevant and personalised Google ads.

\_secure-3PSIDCC: They are used for targeting purposes to profile the interests of visitors to the website and to display relevant and personalised Google ads. Expiration date: 2 years

**Cookie Consent:** To store login settings for user cookies.

**Cookieconsent\_status:** It blocks the popup window containing the Cookie Policy already accepted by the user from reappearing automatically, as long as the cookie exists. Expiration date: 1 year

**\_fpb cookie:** Facebook uses it to deliver a series of advertising products, such as real-time bidding from a third-party advertiser. The main purpose of this cookie is targeting / advertising.

**\_gcl\_au:** It is a first-party cookie for the conversion linker functionality, which collects information by clicking on the ads and then stores them in a first-party cookie so that conversions can be assigned outside the target website.

**\_hjid:** It is a Hotjar cookie. This cookie is set when the client first comes to a website with the Hotjar script. It is used to retain the random user ID, which is a unique ID for a given website in the browser. This ensures that the behaviour of subsequent visits to the same website is assigned to the same user ID.

**YSC:** It is a third party cookie facilitating use. This cookie is set by the YouTube video service on websites that host embedded YouTube videos. It collects data anonymously unless you are logged in with a Google user account. They are cookies used to automatically adjust the quality of the YouTube videos that appear on the site. They also function as session cookies.

**Pref:** This cookie stores your favourite settings and other information, such as the language selected, the number of search results you want to display on the website, and whether you want to turn on the Google SafeSearch filter. Expiration date: 10 years.

**LOGIN\_INFO:** Used by YouTube (Google) to store user preferences and for other unspecified purposes. Expiration date: 10 years.

**hjTLDTest:** Session cookie: When the Hotjar script is running, the most common cookie path is sought to be determined and must be subsequently used instead of the hostname of the website. This is done so that cookies can be shared between subdomains (if applicable). To determine this, attempts to store the \_hjTLDTest cookie for the various URL substring alternatives are continuously made until successful. After this check, the cookie is removed. Expiration date: end of session.

**Facebook pixel (Facebook cookie):** A Facebook pixel is a code that is used to prepare a report on conversions on a website, compile target audiences, and provide the website owner detailed analytics data about visitors' use of the website. With the help of the Facebook remarketing pixel tracking code, the advertiser can display personalised offers and advertisements on the Facebook interface to the visitors of the website. It is not possible to identify a natural person based on the Facebook remarketing list (fr, tr).

For more information about the Facebook Pixel, please, visit: https://www.facebook.com/business/help/651294705016616

(Joint controller: Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA, telephone: +1 650 543 4800.)

The cookies placed by <a href="www.lagunatextil.com">www.lagunatextil.com</a> may be deleted from your device at any time using your browser. For details on how to delete or manage cookies, please, refer to your browser's Help menu. Also, use the browser to block cookies or request a notification each time your browser receives a new cookie. Blocking cookies may technically prevent you from using our website.

If you do not accept the use of cookies, certain features will not be available. For more information about deleting cookies, please refer to the following links:

**Internet Explorer**: <a href="http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11">http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11</a>

**Firefox:** https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer

**Chrome**: https://support.google.com/chrome/answer/95647?hl=en

**Edge:** Settings -> Cookies and site permissions -> Manage and delete cookies and site data ("Allow sites to save and read cookie data (recommended)" / "Block third-party cookies" / use the "Block / Allow / Clear on exit" add-ons or: F12 – Troubleshooting – Cookies

# Purpose, Means and Duration of Processing

The processing is based on the voluntary, express consent of the users of the content on the website <a href="https://www.lagunatextil.com">www.lagunatextil.com</a>, so that their data provided during the visit to and use of the

website is used, which serves the continuous contact and public opinion poll between the website user and the controller.

The purpose of processing is to ensure the provision of services available on the website <a href="https://www.lagunatextil.com">www.lagunatextil.com</a>, to operate an information interface, to compile statistics, and to manage questions received through the website.

The storage of visitor statistics is for statistical purposes only.

The controller does not use the personal data for purposes other than those indicated. The data provided in this way is processed with the voluntary consent of the user.

# **Images Displayed on the Facebook Page**

Laguna Lakástextil Kereskedelmi Kft. regularly publishes information on its activities and the products it sells on its Facebook page.

It pays special attention to the fact that the content of the images published on the Facebook page shall be without prejudice to the personal rights or legitimate interests of others, and to have permission and authorisation to use them lawfully in all cases.

#### Purpose of processing:

Informing the visitors to the Facebook page of Laguna Lakástextil Kereskedelmi Kft.

#### Legal basis for processing:

Processing is based on voluntary consent pursuant to the General Data Protection Regulation (GDPR) of the European Union, Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv), as well as the Civil Code of Hungary.

#### Scope of data processed:

Images containing identifiable, recognisable natural persons.

#### Duration of processing:

Until the data subject's consent is withdrawn or the content is deleted from the Facebook page.

Joint controller: Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland

Laguna Lakástextil Kereskedelmi Kft. does not take responsibility for its earlier pages that have already been deleted, but have been archived with the help of Internet search engines. These

should be removed by the search engine operator.

# **Images Displayed on the Instagram Page**

Laguna Lakástextil Kereskedelmi Kft. regularly publishes information on its activities and the products it sells on its Instagram page.

It pays special attention to the fact that the content of the images published on the Instagram page shall be without prejudice to the personal rights or legitimate interests of others, and to have permission and authorisation to use them lawfully in all cases.

# Purpose of processing:

Informing the visitors to the Instagram page of Laguna Lakástextil Kereskedelmi Kft.

# Legal basis for processing:

The legal basis for processing is the voluntary consent of the data subject in accordance with Article 6 (1) (a) of the GDPR and Section 2:48 of the Civil Code of Hungary.

# Scope of data processed:

Images containing identifiable, recognisable natural persons.

# Duration of processing:

Until the data subject's consent is withdrawn or the content is deleted from the Instagram page.

Laguna Lakástextil Kereskedelmi Kft. does not take responsibility for its earlier pages that have already been deleted, but have been archived with the help of Internet search engines. These should be removed by the search engine operator.

#### Videos Published on the Youtube Channel

Laguna Lakástextil Kereskedelmi Kft. uploads videos presenting its products and activities to its Youtube channel to promote its products.

It pays special attention to the fact that the content of the videos published on the Youtube channel shall be without prejudice to the personal rights or legitimate interests of others, and to have permission and authorisation to use them lawfully in all cases.

#### Purpose of processing:

Informing the visitors to the Youtube channel of Laguna Lakástextil Kereskedelmi Kft.

Legal basis for processing:

The legal basis for processing is the voluntary consent of the data subject in accordance with Article 6 (1) (a) of the GDPR and Section 2:48 of the Civil Code of Hungary.

### Scope of data processed:

Images containing identifiable, recognisable natural persons.

# Duration of processing:

Until the data subject's consent is withdrawn or the content is deleted from the Youtube channel.

Laguna Lakástextil Kereskedelmi Kft. does not take responsibility for its earlier pages that have already been deleted, but have been archived with the help of Internet search engines. These should be removed by the search engine operator.

# **Data Processes during Inquiries, Contact and Requests for Quotation:**

Laguna Lakástextil Kereskedelmi Kft. can be contacted via the contact details on the website or by sending a message directly via the contact form. The company will only use the personal information provided to contact you and will not transmit it.

### Purpose of processing:

To provide information and give a quotation.

#### Legal basis for processing:

In the case of inquiries or requests for information or a quotation, the processing is based on voluntary consent pursuant to the General Data Protection Regulation (GDPR), Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv).

Scope of data processed:

In the event of a contact initiated through the website, the following personal data are stored:

- name
- e-mail address
- telephone number
- message

### Duration of processing:

Laguna Lakástextil Kereskedelmi Kft. processes your personal data for various periods of time, depending on the nature of the contact.

In the case of an inquiry or a contact initiated, the data will not be stored after the necessary information has been provided, unless the subject matter of the ad hoc initiated contact gives

rise to a legally enforceable claim, in which case the data can be stored for a maximum of 5 years for the purpose of supporting the claim.

#### **E-mail Customer Service**

The purpose of processing: to support customers using the service, to inform those submitting an inquiry.

Data processed: name, e-mail address, and message (optional: telephone number)

Legal basis for processing: processing necessary for the performance of the contract or for pre-contractual steps (Article 6 (b) of the GDPR)

Duration of processing: 90 days from the last request.

# **Images Displayed on the Website**

Laguna Lakástextil Kereskedelmi Kft. publishes pictures and videos of its products and activities on the website www.lagunatextil.com.

It pays special attention to the fact that the content of the images and recordings published on the website page shall be without prejudice to the personal rights or legitimate interests of others, and to have permission and authorisation to use them lawfully in all cases.

#### Purpose of processing:

Informing the visitors to the website <a href="www.lagunatextil.com">www.lagunatextil.com</a>, promoting the company's products and activities.

#### Legal basis for processing:

The legal basis for processing is the voluntary consent of the data subject in accordance with Article 6 (1) (a) of the GDPR and Section 2:48 of the Civil Code of Hungary.

### Scope of data processed:

Images and statements of identifiable and recognisable natural persons in the recordings.

#### Duration of processing:

Until the data subject's consent is withdrawn or the content is deleted from the website.

Laguna Lakástextil Kereskedelmi Kft. does not take responsibility for its earlier pages that have already been deleted, but have been archived with the help of Internet search engines. These should be removed by the search engine operator.

#### **Miscellaneous Provisions**

The data you provided may only be rightfully accessed by Laguna Lakástextil Kereskedelmi Kft. The controller does not check the data provided by the user, the user is solely responsible for their authenticity and accuracy.

The controller treats all data and details relating to users confidentially, and uses them exclusively for the development of its services and for the production of its own research and statistics. Statements made about them may only be published in a form that is not suitable for the unique identification of individual users.

The data processing on <a href="www.lagunatextil.com">www.lagunatextil.com</a> is carried out in accordance with the applicable legal regulations and the data protection rules set forth in this Policy; the data is used exclusively in the course of the company's activities and is not transferred to other natural or private persons without the user's consent. Exceptions are data disclosures based on a legal obligation or the use of data in a statistically aggregated form, which does not include the name of the user or any data suitable for user identification.

If the controller wishes to use the provided data for purposes other than the ones described in this Privacy Statement, the user shall be informed accordingly at the provided e-mail address and his/her prior express consent shall be obtained, and a possibility for the user to disallow different use of his/her data must be provided.

Due to the fact that the user's disclosure is voluntary and free from external influences, the company may process their data until the user prohibits it in writing to the e-mail address info@lagunatextil.com, in which case the deletion from the register will be completed within 48 hours. The same contact details can be used to report data changes, which will also be carried out within 48 hours.

Laguna Lakástextil Kereskedelmi Kft. does not take responsibility for its earlier pages that have already been deleted, but have been archived with the help of Internet search engines. These should be removed by the search engine operator.

#### **Personal Data Breach**

The controller declares that appropriate security measures have been taken to protect the personal data in particular from unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as against accidental destruction and damage, and from becoming inaccessible due to changes in the technology used.

The controller ensures that the data processed is exclusively accessible to those with appropriate authorisation. To this end, the controller also ensures the security of processing through IT and work organisation measures as well as measures taken within the organization.

Nonetheless, the controller must also inform data subjects about the fact that, despite the best possible security measures, software and systems using state of the art protection

techniques, any form of data transfer over the Internet is inherently vulnerable to illegal and unfair attacks. The computers used by the data controller's employees and contributors are secured by a unique password, and to further prevent unauthorised access, they are equipped with a firewall and anti-virus software as a safeguard against viruses, malware and intrusions.

In the case of a personal data breach, the 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 competent supervisory authority (Nemzeti Adatvédelmi és Információszabadság Hatóság [National Data Protection and Freedom of Information Authority] address: 1055 Budapest, Falk Miksa u. 9-11.; phone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu; website: <a href="www.naih.hu">www.naih.hu</a>), unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

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

- the 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;
- the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;
- 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.

### **Description of Rights Related to Processing:**

# Pursuant to Article 15 of the GDPR, the data subject may request access to personal data concerning him or her as follows:

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- 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;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;

h) 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.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

# Pursuant to Article 16 of the GDPR, the data subject has the right to request from the Controller the rectification of personal data concerning him or her.

Upon such request from the data subject, the controller shall, without undue delay, rectify the inaccurate personal data concerning the data subject. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

# Pursuant to Article 17 of the GDPR, the data subject has the right to request from the Controller the erasure of personal data concerning him or her as follows:

The data subject shall have the right to request from the Controller the erasure of personal data concerning him or her and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- the data subject objects to the processing of their personal data carried out in the public interest, in the exercise of official authority or in the legitimate interest of the controller (third party), and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for the purposes of direct business acquisition;
- d) the personal data have been unlawfully processed;
- e) 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;
- f) the personal data have been collected in relation to the offer of information society services.

Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The data subject's right of erasure may only be limited in the case of the following exceptions included in the GDPR, i.e. in the case of the above reasons, the further retention of personal data can be considered lawful:

- a) for exercising the right of freedom of expression and information, or
- b) for compliance with a legal obligation, or
- c) for the performance of a task in the public interest, or
- d) in the exercise of official authority vested in the controller, or
- e) for the public interest in the field of public health, or
- f) for archiving purposes in the public interest, or
- g) for scientific or historical research purposes or statistical purposes, or
- h) for the establishment, exercise or defence of legal claims.

# Pursuant to Article 18 of the GDPR, the data subject has the right to request from the Controller the restriction of the processing of personal data concerning him or her as follows:

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to the processing of their personal data carried out in the public interest, in the exercise of official authority or in the legitimate interest of the controller (third party), pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted as per the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

# Pursuant to Article 21 of the GDPR, the data subject has the right to object to the Controller processing personal data concerning him or her as follows:

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of their personal data carried out in the public interest, in the exercise of official authority or in the legitimate interest of the controller (third party), including profiling based thereon. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the 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, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

At the latest at the time of the first communication with the data subject, the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

# Pursuant to Article 20 of the GDPR, the data subject shall have the right to the portability of personal data concerning him or her as follows:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the legal basis for processing is the consent of the data subject or the performance of the contract concluded with the data subject
- b) and the processing is carried out by automated means.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to the erasure of personal data. The right to data portability shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right to data portability shall not adversely affect the rights and freedoms of others.

# Pursuant to Article 7 (3) of the GDPR, the data subject has the right to withdraw his or her consent to the processing of his or her personal data at any time as follows:

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. It shall be as easy to withdraw as to give consent.

Within five years after the death of the data subject, a person authorised by the data subject through a statement about an administrative order that is included in a public document or a private document of full probative value and made before the controller is eligible to exercise the rights belonging to the deceased in his/her lifetime.

If the data subject did not make such statement, pursuant to the Civil Code, a close relative is entitled to exercise certain rights that belonged to the deceased in his/her lifetime, even in the absence such statement.

#### **Remedies**

If, according to the data subject, the controller has violated any legal provision on processing or has not complied with one or more of his/her requests, the data subject may initiate proceedings by the Nemzeti Adatvédelmi és Információszabadság Hatóság [National Authority for Data Protection and Freedom of Information] (address: 1055 Budapest, Falk Miksa u. 9-11., postal address: 1363 Budapest, Pf.: 9., telephone: +36 (1) 391 1400, fax: +36 (1) 391 1410, email: ugyfelszolgalat@naih.hu, website: http://naih.hu).

In the case of violation of the rights of the data subject or if the controller has failed to comply with one or more of the data subject's requests, the data subject may also take legal action against the controller. The court shall grant expedited trials. The trial falls within the jurisdiction of the tribunal.

If you find a violation of the legal provisions on processing in connection with the Facebook page of Laguna Lakástextil Kereskedelmi Kft. or any of your related requests have not been complied with, your personal data is processed by Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland). The Irish Data Protection Authority is therefore entitled to deal with the matter, so you should file your complaint to the Irish Data Protection Commission (21 Fitzwilliam Square, South Dublin 2, D02 RD28, Ireland).