

# Privacy Policy and Cookie Information

Effective from March 22, 2023

At Matusz-Vad, we strive to offer more to our customers day by day. The handling of the personal data you provide is a crucial part of this work. We want to assure you that your personal data is safe with us, and also that you understand how we use your personal data to provide you with an even better shopping experience.

## 1. What is this policy about?

Your personal data is handled by Matusz-Vad Private Limited Company (headquarters: 1103 Budapest, Kőér street 3/A., tax number: 14651245-2-42) as a data controller (hereinafter referred to as "we", "us" or "Matusz-Vad")

The most important thing for us regarding the collection, use, and protection of your personal data is to act correctly. Therefore, we have prepared this privacy policy and cookie information (hereinafter referred to as Policy), which:

- defines what type of personal data we collect,
- provides information on how we collect and use your personal data,
- explains when and why we share personal data within Matusz-Vad and with other organizations, and
- serves as a guide about your rights and choices related to your personal data.
- We offer a wide range of products and services, so we want to make it clear to you what this Policy refers to. This Policy applies to you if you use our services (hereinafter referred to as "Our Services"). The use of Our Services means the following:
  - shopping in the Matusz-Vad web store, or purchasing in other ways through our websites (hereinafter referred to as "Our Websites") or mobile applications (hereinafter referred to as "Our Applications") where this Policy is available, or
  - subscribing to electronic direct marketing communication, such as newsletters that you may receive from us by email or SMS,
  - applying for a customer club membership, or participating in market research, sweepstakes or events organized by us.

This Policy also applies if you contact us or we contact you about Our Services.

Our Websites or mobile Applications may also contain links to third-party websites that have their own privacy policies. Please read the data management information applicable to the given website carefully before providing your personal data on any website. Since we have no control over the content found on third-party websites, we do not take responsibility for them.

We handle your personal data in accordance with the General Data Protection Regulation of the European Union (EU 2016/679, hereinafter: GDPR) and other applicable data protection laws implementing or supplementing it.

## **2. Personal data we collect**

This section contains what personal data we ask from you to use Our Services and what other personal data we receive from other sources.

When you register for Our Services, you can provide us with your:

- personal information, including your postal and billing address, e-mail address, phone number,
- password chosen by you.

When you shop with us using the online store, or use the browser on Our Websites or our mobile Applications, we may collect the following information:

- Information about your online purchases (for example, what you bought, when and where you bought it, and how you paid for it).

When you contact us, or we contact you, or you participate in promotions, sweepstakes, or research or surveys related to the Services we provide, we may collect the following information:

- Personal data that you provide about yourself, whenever you contact us in relation to Our Services, for example, by phone, email, or mail, or when you communicate with us through social media (such as your name, username, contact details),
- your feedback and observations in customer research or questionnaires.

Other sources of personal data:

We may also use personal data from other sources, such as specialist information providers or online media channels. Such other personal data help us, for example, improve and measure the efficiency of our marketing communication, including online advertisements.

## **3. How and why do we use personal data?**

This chapter provides information on how and why we use personal data:

Why do we use personal data?	What does this mean in terms of personal data processing?	Why do we collect personal data in this way?	Legal basis
<b>We provide you with our services</b>	Managing your user accounts, including your online store user account Managing your orders and refunds	In order to manage your user accounts, provide the products and services you wish to purchase, and handle any orders and refunds you may request, we need to process your personal data.	<p><b>Contract performance: We collect the following data:</b></p> <ul style="list-style-type: none"> <li>• identification data</li> <li>• purchase and transaction data</li> <li>• contact data</li> <li>• delivery data.</li> </ul> <p>Without this information, we cannot provide you with the products and services.</p>
<b>Ensuring and improving daily operations</b>	Management and improvement of our Websites and Mobile Applications	To improve the customer experience on our Websites and Mobile Applications, we use cookies and similar technologies.	<p><b>Legitimate interest:</b> We collect the following data:</p> <ul style="list-style-type: none"> <li>• IP address</li> <li>• type of device used</li> <li>• browser name</li> <li>• selected language</li> </ul>
	Supporting the development and improvement of our product range, services, showrooms, information technology systems, know-how and communication with you.	<p>Certain cookies are required, so if you want to use the functions of our Websites and Mobile Applications, please do not disable their use. You can turn off other cookies, but this may degrade the user experience. For more information about cookies and how to disable them, please see the section on cookies and similar technologies.</p> <p>The use of personal data is necessary to carry out market research, internal surveys and improvements, and to improve our information technology systems (including security), as well as our product range, our services and our showrooms.</p>	<b>Legitimate interest</b>
	Detection and prevention of fraud and other criminal offenses	<p>This enables us to provide you with better service.</p> <p>It is important for us to monitor the use of our Services in order to prevent or detect fraud, other criminal offenses and improper use of our Services. This helps us to ensure that you can use our Services safely in accordance with the General Terms and Conditions.</p>	<b>Legitimate interest</b>

	Sending you marketing communications about our products and services - including online shopping and Matusz-Vad offers (including by email, SMS, post, or online advertising).	We would like to send you marketing materials about our products and services through your chosen communication channels. You can change your marketing preferences at any time during and after registration.	In case of marketing communication sent to you by post, e-mail or SMS, we refer to <b><u>your consent</u></b> .
<b>Contacting and cooperating with you</b>	To contact you in relation to our services, for example by phone, email, or post, or in response to posts appearing in social media addressed to us.	We want to provide even better service to you as a customer, for this we use personal data to provide a clear response or assistance to your communications, and to inform you about changes we have made or planned in our services that affect you (for example: changes in the Policies, or the General Terms and Conditions applicable to our Services).	<b>Your consent</b>
	Managing promotions and competitions in which you participate, including those organized together with our suppliers and Matusz-Vad partners.	The processing of your personal data is necessary to operate the promotions and competitions of your choice, if you wish to participate in them.	<b>Your consent</b>
<b>Disputes, Complaints, or Requests</b>	Resolving complaints, legal claims or disputes that affect you or us.	For example, if you are dissatisfied with the products you purchased from us, or if you have an accident or incident in our sample store. In some cases, this may also mean medical documents.	<b>The establishment, exercise, or defense of legal claims, however, in some cases we refer to our Legitimate interest or specified legal requirements, based on which we may process your personal data in order to fulfill our legal obligations.</b> <b>In the case of a consumer complaint, the legal basis for data processing is Section 17/B of Act CLV of 1997 on Consumer Protection.</b>

#### 4. Sharing personal data with service providers for Matusz-Vad

We work together with carefully selected Service Providers who perform certain tasks on our behalf and thus qualify as data processors. These are companies that provide us with services such as:

- technological services (e.g., operation of Our Websites, our web Applications, and other business systems used to provide services): Raabcom Ltd. (2890 Tata, Dózsa György street 40.)
- measurement and analytics: Google Analytics and ADS - Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) – conversion measurement; data transferred: e-mail address (in relation to the Google AdManager service, Google qualifies as an independent data controller)  
Facebook – Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour; 462129 Dublin, Ireland) API conversion measurement, data transferred: e-mail address

We only share those personal data that enable the Service Providers to provide their services.

### Sharing personal data with other organizations

This section explains why and how we share personal data with other organizations.

We may share personal data with other organizations in the following cases:

- if a law or public authority obliges us to or it is necessary for the proper operation of justice to share personal data,
- if we have to share personal data to establish, exercise or defend our rights (this includes personal data shared with others for the purpose of fraud prevention),
- when we reorganize, sell, or transfer our business (or part of it). For example, in the case of a merger or union.

## **5. Data security measures related to the protection of personal data**

We know how important the management and protection of your personal data is. This section includes the tools we use for this.

We use computer security tools such as firewalls and data encryption, and physical entry protection tools in our buildings and records to ensure data security. We only give access to those employees who need it to perform their work. We also protect the security of the information during its transmission by encrypting the data.

Physical, electronic, and procedural security tools are used to collect, store, and share personal data. We may occasionally request proof of identity before sharing your personal data with you.

In addition to using appropriate technical and organizational tools to preserve the security of your personal data, please note that we cannot guarantee the security of personal data transmitted by you over the internet.

The personal data we collect from you may be transferred within the European Economic Area ("EEA") and stored there. Personal data may be processed by companies operating outside the EEA on our behalf or on behalf of a company providing services to us. If this happens, we ensure that your privacy rights are respected in accordance with this Policy. The most recognized way of ensuring this is the use of standard contractual clauses. For more information about data transfers outside the EEA – including the model clauses – please click here:

[https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

## **6. The duration of personal data storage**

We will not store your personal data for longer than necessary. What this duration means depends on several factors, such as:

- primarily why we collected them,
  - how long we have been storing them,
  - whether there is a legal/regulatory requirement that justifies their storage,
  - whether they are needed to protect either you or us.
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- In case of registration or subscription for marketing purposes, we process personal data until you request the deletion of your data (user account), or withdraw your consent to the processing of your personal data. Deleting the data does not affect the data controller's data retention obligation related to the purchase.
  - In case of purchase, we process the necessary data for 5 (five) years after the purchase to enforce claims and rights arising from the contract in accordance with Section 6:22 of Act V of 2013 on the Civil Code, and also to fulfill the retention obligation of the data controller in accordance with Section 169 of Act C on Accounting, we keep your name and address appearing on the accounting document for 8 years, solely for the purpose of fulfilling the accounting obligation.
  - In case of consumer complaint, according to Section 17/B of Act CLV of 1997 on consumer protection, we are obliged to keep the record of the verbal complaint, the written complaint and the response to it for 3 (three) years.
  - If the legal basis for the data processing specified in point 3 is the legitimate interest of the data controller, we retain the personal data affected by such data processing for 30 days.

## **7. Marketing**

This section explains what choices you have when you receive marketing communication.

We will send you highlighted offers and news related to our products and services in various ways, according to your choice, including email, SMS, postal mail, but only if you have previously consented to this. When you register with us, we will ask if you want to receive marketing communication and you can change your marketing preferences at any time, online, by phone, or by clicking the 'unsubscribe' link in the email communication we send you. In this case, we will not send you more marketing emails or contact you on the communication channel indicated by you, but please note that until we have fully updated our systems, you may still receive such communication for a short time after setting your preferences.

## **8. Cookies and similar technologies**

We and our partners use cookies and similar technologies when you use Our Websites and mobile Applications ("Cookies") to make your shopping experience more personal and to improve it, as well as to show you relevant online advertisements. This section contains more information about Cookies, including how we use them and how you can exercise your rights regarding the use of Cookies.

## How do we use Cookies?

Cookies are small text files containing a unique identifier that is stored on your computer or mobile device, making your device recognizable when you visit a particular website or use an application. Cookies can be used only for the duration of the visit to the particular page or to measure how you use the service and content from time to time. Cookies help to display important features and functions on Our Websites and mobile Applications and improve your shopping experience.

### Cookies Necessary for Website Operation

Cookies necessary for the operation of Our Websites and mobile Applications help to ensure that Our Websites and mobile Applications work properly, improve their operation to make your user experience more personal, and to allow you to use many useful features.

For example, we use Cookies to remember your preferences or the contents of your shopping cart when you return to Our Websites and mobile Applications. Cookies necessary for operation also help to understand how Our Websites and mobile Applications are used, for example: you notify us if you get an error message while browsing. These Cookies mostly collect aggregated and anonymous data. The Cookies necessary for the operation of the Website and Application are as follows:

<b>Cookie name, type</b>	<b>Purpose of data processing</b>	<b>Duration of data processing</b>
ci_session	cookie necessary for the operation of the site	1 month
PHPSESSID	cookie necessary for the operation of the site	until the browser is closed
sid - session id	cookie necessary for the operation of the site	until the browser is closed
mobile - mobile view	cookie necessary for the operation of the site	3 months

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### Cookies placed by third parties on Our Websites and mobile Applications

Based on your separate consent, we use Cookies on Our Websites, on other websites, and during the use of social media for the display of online, personalized ads that we think might be the most interesting to you. Most of the time, Cookies used for such purposes are placed on Our Websites by third parties who provide specialized services for us. These Cookies can collect information about your online behavior, such as your IP address, the website from where you arrived, and information about your shopping history or shopping cart content. This means that you can see our ads on Our Websites and on other websites, but on Our Websites, you can also see ads from third parties. The purpose of using such Cookies is also to enable advertising on social media platforms and to facilitate social sharing and connection on Our Websites.

We also use Cookies placed on Our Websites and Applications by third parties with the purpose of enhancing user experience and generating statistics related to Our Websites/Applications. The task of these statistical purpose Cookies is to analyze how users use our services, this includes the testing of different content changes as well.

The Cookies placed by third parties are included in the following table:

Cookie name, type	Personal data used	Purpose of data processing	Duration of data processing
_ga (UGA3))		statistics	2 years
Google Analytics, Signals and ADS (Google Tag Manager)	email	statistics and ad placement	max 14 months
mobile - mobile view		cookie necessary for the operation of the site	3 months
Facebook pixel	email	statistics (conversion tracking) and ad placement	180 days
Tiktok pixel		ad placement	180 days
Hotjar		statistics	365 days

Your choice regarding Cookies

Web Browser Settings

In your browser settings, you can accept or refuse new Cookies and delete existing Cookies. You can also set your browser to notify you every time new Cookies are placed on your computer or other device. You can find additional information on managing Cookies in your browser's "help" function. If you decide to turn off some or all Cookies, you will not be able to use all of the features on Our Websites. For example, you will not be able to put products in your cart, log out, or use products and services that require login.

Mobil Mobile Applications

Cookies function differently in mobile applications as they are encoded into the applications and use a unique identifier that your mobile device creates for advertising activities. You can turn off or restart this advertising identifier in your mobile device's privacy settings.

## 9. Your rights regarding the processing of your personal data



## **a. Right of Access**

You have the right to request personal data that we hold about you. This is known as a subject access request. If you would like to receive a summary of the personal data we have stored about you, please call us at this number: +36/70-455-86-33 or write to the following contact details: [adatkezeles@matusz-vad.hu](mailto:adatkezeles@matusz-vad.hu) ; 1103 Budapest, Kőér utca 3/A.

## **b. Other data protection rights**

In relation to your personal data, you also have the right to:

- the correction of incorrect information:  
What this right means:  
If you believe that the data we hold about you is incorrect or incomplete, please contact us and we will correct it.
- to object to its use: What this right means:  
general objection – In this case, we will examine your objection to our use of your data. If on balance, your rights are more significant than our interests in using your personal data, then upon your request we will either stop using them (see point 3 below) or delete them (see point 4 below).  
objection to direct marketing – If you raise such an objection, we will not use your personal data for direct marketing purposes.
- to prohibit its use: What this right means:  
You can prohibit the use of your personal data in many cases, including (but not exclusively), if:
  - you have successfully lodged a general objection (see point 2 above).
  - you dispute the accuracy of the personal data we hold.
  - we have used your personal data unlawfully, but you do not want us to delete them.
- to delete your data: What this right means:  
You can request us to delete your personal data in many cases, including (but not exclusively), if:
  - we no longer need to keep your personal data,
  - you have successfully lodged a general objection (see point 2 above),
  - you have withdrawn your consent for us to use your personal data (and we have no other legal basis for using them),
  - we have processed your personal data unlawfully.
- to transmit your data or to have them transported in copy: What this right means:  
Data portability is a new right that entitles everyone in the EU to transfer their personal data between organisations. This right is free and allows customers to switch providers. It means that the individual should receive their data in a structured, widely used, machine-readable format. You can submit your data-related request at the following telephone number: +36-70-370-70-95  
You may request that we send a copy of your data to you or to a third party.
- To file a complaint with the data protection authority:  
If you have a complaint, we would like to help resolve it, but you also have the right to file a complaint about our use of your personal data with the data protection authority, and you can also take the matter to court.

National Data Protection and Freedom of Information Authority (NAIH) address: 1055 Budapest, Falk Miksa utca 9-11., tel. +36 1 3911 400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) ; website: <http://www.naih.hu>

#### **10. More information about your data protection rights**

The Data Protection Authority's website contains additional information about the data protection rights referenced above. Moreover, if you would like more detailed information about these rights, please contact us using one of the contact details listed in point 11.

#### **11. Contacting us**

If you have any questions about how we collect, store or use your personal data, please contact us using the following details:

Phone: +36-70-370-70-95

E-mail: [adatkezeles@matusz-vad.hu](mailto:adatkezeles@matusz-vad.hu)

Postal address: 1103 Budapest, Kőér utca 3/A.