

Data Protection Policy

www.avxcafe.com

1. Introduction

ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság
(Budapesti út 4., Szeged 6728, Hungary, Company registration number: 06-10-000239
VAT number: 11596185-2-06) (hereinafter referred to as Service Provider or Data
Controller) undertakes to comply with this Policy.

In accordance with Regulation (EU) 2016/679 of the European Parliament and 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 Directive 95/46/EC (General Data Protection Regulation), we provide the following information.

This Data Protection Policy shall regulate the data controlling of the following sites:

<https://www.avxcafe.com/>

The Data Protection Policy is accessible at the following site:

<https://www.avxcafe.com/>

Any modification of the Policy shall be effective upon being published at the above address.

Name and contact details of the Data Controller:

Name: ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság

Seat of Data Controller: Budapesti út 4., Szeged 6728, Hungary

Email: atcexport@atctrade.com

Telephone: +36 62 555 111

Representative of Data Controller: CEO Béla Gajdán

Contact details of the person responsible for data protection:

Name: Béla Gajdán, ATC-Trade Zrt. (Budapesti út 4., Szeged 6728, Hungary)

Email: import@atctrade.com

Used data processors

Supply:

Activity performed by the Data Controller: Delivery of products, transportation

Name and contact details of the Data Processor:

MPL Magyar Posta Logisztika Kft.

Dunavirág utca 2-6., Budapest 1138, Hungary

ugyfelszolgalat@posta.hu

Phone: +36 80299-929 green line

DPD Hungária Kft.

Budapest, Késmárk utca 14/b, 1158

dpd@dpd.hu

Phone: +361 501 6200

Fact of data processing, scope of processed data: Delivery name, delivery address, phone number.

Scope of data subjects: Any person requesting a delivery shall be a data subject.

Purpose of data processing: delivery of the ordered product.

Duration of data processing, deadline of data erasure: Before the completion of the delivery.

Legal basis of data processing: consent of the User, Point a) of Paragraph (1) of Article 6, Section 5 of the Infotv.

Hosting service provider:

Activity performed by the Data Controller: Provision of hosting service

Name and contact details of the Data Processor:

EV2 Internet Kft.

1149 Budapest, Róna u. 120-122.

Telephone: 460-0104

F.: 221-1102

E-mail: info@ev2.hu

Fact of data processing, scope of processed data: Any personal data provided by the data subject.

Scope of data subjects: Any user of the website shall be a data subject.

Purpose of data processing: Making the website available, ensuring its proper operation.

Duration of data processing, deadline of data erasure: Immediately upon the deletion of the registration.

Legal basis of data processing: consent of the User, Subsection (1) of Section 5 of the Infotv, Point a) of Paragraph (1) of Article 6, and Subsection (3) of Section 13/A of Act CVIII of 2001 on certain Aspects of Electronic Commerce and Information Society Services.

Accounting:

Activity performed by the Data Controller: accounting

Name and contact details of the Data Processor:

Számáradat Kft.

Gyöngyvirág u. 11., Sándorfalva 6726, Hungary

Telephone: (30) 967 0393

B.T. Automatik Kft.

Barátság utca 4. 2., Szeged 6791, Hungary

Telephone: 20/4050-799

Számtérkép 2010 Bt.

IX. em. 50., Lomnici utca 41., Szeged 6723, Hungary

Telephone: 30/858-5603

Fact of data processing, scope of processed data: invoicing data.

Scope of data subjects: Any data subject making a purchase in the online store.

Purpose of data processing: completion of the accounting service provided to the data controller.

Duration of data processing, deadline of data erasure: In accordance with the obligation on retention prescribed by the Act on Accounting.

Legal basis of data processing: consent of the User, Point a) of Paragraph (1) of Article 6, Section 5 of the Infotv.

The above provisions do not affect the completion of any obligation on retention prescribed by statutory provisions (e.g. laws on accounting).

Online payment:

Activity performed by the Data Controller: Online payment

Name and contact details of the Data Processor:

PayPal Holdings, Inc.

Address: 2211 North First Street, San Jose, California, U.S.

Website: www.paypal.com

Fact of data processing, scope of processed data: Invoicing name, invoicing address, email address.

Scope of data subjects: Any person requesting online payment shall be a data subject.

Purpose of data processing: Executing online payment, confirming transactions, and fraud monitoring for the sake of the protection of the users.

Duration of data processing, deadline of data erasure: Before the completion of the online payment.

Legal basis of data processing: consent of the User, Subsection (1) of Section 5 of the Infotv, Point a) of Paragraph (1) of Article 6, and Subsection (3) of Section 13/A of Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services.

2. Rules on Data Protection

This Data Protection Policy shall be in effect from 25 May 2018 until withdrawal.

As the operator of website www.avxcafe.com (hereinafter referred to as “Website”), ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság informs the website visitors on the fact that personal data will only be processed in accordance with this Data Protection Policy in connection with this website.

This document has been prepared in accordance with the Data Protection and Data Safety Rules of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság, and its subject of application shall cover any process implemented by ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság while operating the website, where personal data according to Point 2 of Section 3 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as “Infotv”) is processed.

The terms of this document are in compliance with the interpreting term definitions of Section 3 of the Infotv.

ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság declares that personal data will only be processed to exercise rights or comply with obligations. The processed personal data will not be used for private purposes, the data processing shall always be in accordance with the principle of purpose limitation - if the Purpose of data processing no longer exists or if the data processing is otherwise illegal, the data will be deleted.

ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság only processes

personal data with the prior consent of the data subject or based on statutory provisions.

By the means of this document, ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság intends to inform the data subject on the Purpose of data processing, the Legal basis of data processing, and any further information related to data processing, before registering any data.

The employees performing data processing at the organizational units of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság shall be obliged to keep the learned personal data as business secret.

The organization of data protection, the scopes of tasks and objectives of data protection and the related activities, and the person responsible for data processing shall be defined by the Chief Executive Officer of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság, while taking the specific characteristics of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság into consideration.

While performing their work, the employees of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság ensure that authorized person are not able to have an insight to personal data. Personal data will be stored and placed in a manner which does not allow it to be accessed, learned, modified or destroyed by unauthorized parties.

Data processing related to the operation of the online store:

Fact of data processing, scope of processed data, Purpose of data processing:

Personal data	Purpose of data processing:
Password	Serves to ensure the safe access to the user account.
First name and last name	Necessary for contacting, purchasing, and issuing a proper invoice.
Email address	Contacting.
Telephone number	Contacting, more effective communication of

	matters related to invoicing or delivery.
Invoicing name and address	Issuing a proper invoice, preparing the contract, defining the content of the contract, modifying, monitoring the performance, invoicing the resulting fees, and completing the related claims.
Delivery name and address	Making the delivery possible.
Date of purchase/registration	Executing a technical operation.
IP address at purchasing/registering	Executing a technical operation.

Location of data processing:

ATC-Trade Zrt., Budapesti út 4., Szeged 6728, Hungary

Scope of data subjects: Anyone registering/purchasing at the website shall be a data subject.

Duration of data processing, deadline of data erasure: Immediately upon the deletion of the registration. Except for the accounting notes, because such data shall be retained for 8 years, in accordance with Subsection (2) of Section 169 of Act C of 2000 on Accounting.

Possible data processors entitled to learn the data, receivers of the personal data: Personal data may be processed by the sales colleagues of the data controller, in accordance with the above principles.

3. Enforcing the Rights of Data Subjects

Any personal person directly or indirectly identifiable according to the personal data may request information on the processing of its personal data, any may request the rectification of its personal data, and – except for the data processing prescribed by statutory provisions – the erasure of the data or their transfer to a third party, via the indicated contact details of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság.

The Legal basis of data processing is the consent of the data subject, Point a) of Paragraph (1) of Article 6, Subsection (1) of Section 5 of the Infotv, and Subsection (3) of Section 13/A of Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services (hereinafter referred to as “Elker tv”).

ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság shall give an answer to requests received in connection with processing the personal data of the data subject no later than 30 days after receipt, and no later than 5 days in case of exercising the right for objection, in writing and in an easily understandable format.

The provision of information shall cover the information defined by Subsection (1) of Section 15 of the Infotv, provided that providing such information cannot be refused in accordance with statutory provisions.

As a general rule, providing information is free of charge, fees will only be charged by ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság in cases prescribed by Subsection (5) of Section 15 of the Infotv.

ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság only refuses requests for reasons prescribed by Subsection (1) of Section 9 or Section 19 of the Infotv, such refusal shall be justified accordingly in writing, by providing the information in accordance with Subsection (2) of Section 16 of the Infotv.

The incorrect data shall be rectified by the leader of the organizational unit managing the data, provided that the necessary data and the authentic instruments proving them are available, and takes measures for the sake of the erasure of the personal data in case of the existence of reasons prescribed by Subsection (2) of Section 17 of the Infotv.

For the duration of the evaluation of the data subject’s objection against processing personal data, but for no longer than 5 days, the leader of the organizational unit processing the data shall suspend data processing, evaluate whether the objection is justified or not, and make a decision. The data subject shall be informed on the decision in accordance with the provisions of Subsection (2) of Section 21 of the Infotv.

If the objection is justified, the leader of the organizational unit processing the data shall proceed in accordance with the provisions of Subsection (3) of Section 21 of the Infotv. ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság shall compensate for damages caused to others by processing the data of the data subject illegally or violating data security requirements, and shall also pay the tort to be paid for the breach of the right for privacy by itself or by the data processors used by it. However, ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság shall not be obliged to pay a compensation or tort for the caused damages if it is able to prove that the damage or the breach of the right for privacy of the data subject was caused by a reason beyond the control of data processing. Therefore, the damages resulting from the behavior, whether intentional or due to gross negligence, of the injured party shall not be compensated.

In case of any complaint on the data processing procedure of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság, the data subject may contact NAIH:

Hungarian National Authority for Data Protection and Freedom of Information,

Szilágyi Erzsébet fasor 22/C., Budapest 1024, Hungary

www.naih.hu

We inform you that data processing is based on your consent. Providing personal data is necessary to complete the order. If you fail to provide the data, we will not be able to manage your order.

4.1. Data processing of the website

Anyone may access the website of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság without exposing its identity or providing its personal data, and information may be obtained from the website and the pages connected to it freely and without limitation. However, information not related to a person is collected without limitation and automatically by the website from the visitors. However, personal data cannot be gained from such data, therefore no personal data is processed in accordance with the Infotv.

ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság uses the web analytics service of Google Analytics at the website. Google Analytics uses “cookies” i.e. text files placed at the computer of the website visitor, in order to help to analyze the use of the website. Information on the use of the website generated by the cookies (IP address of the website visitor) is forwarded to the Google server in the USA, and also stored there.

Google does not connect the information generated by cookies with other data – therefore, in accordance with the applicable laws on data protection, it does not control personal data. The visitor of this website may refuse the use of cookies by selecting the settings of the browser accordingly.

By using this website, the visitor of the website agrees the processing of its data, by the methods and for the purposes described above.

Google uses the above data to evaluate and analyze the way you used the website, to prepare reports on the activities performed at the website, and to provide other services in connection with the activity performed at the website and the internet use.

4.2. Management of complaints

Fact of data processing, scope of processed data, **Purpose of data processing:**

Personal data	Purpose of data processing:
First name and last name	Identifying, contacting
Email address	Contacting.
Telephone number	Contacting.
Invoicing name and address	Identifying, managing any complaint, question and problem incurring in connection with the ordered products.

Scope of data subjects: Any data subject making a purchase in the online store, and making a complaint on the quality.

Duration of data processing, deadline of data erasure: In accordance with Subsection (7) of Section 17/A of Act CLV of 1997 on Consumer Protection, the copies of the record on the recorded claim, and the response given to it, shall be retained for 5 years.

Possible data controllers entitled to learn the data, receivers of the personal data:

Personal data may be processed by the sales and marketing colleagues of the data controller, in accordance with the above principles.

Description of the rights of the data subjects related to data processing.

The data subject may request the data processor to provide access to the personal data related to it, to rectify, erase or restrict the processing of such personal data, it may object to the processing of such personal data, and data subjects also have the right for data portability, and to withdraw the consent anytime.

The access, erasure, modification, restriction of processing of personal data, the portability of data, and the objection against processing data may be requested by the data subject by the following means:

- by post: at the address Budapesti út 4., Szeged 6728, Hungary;
- by email: at the email address atcexport@atctrade.com;
- by telephone: at phone number +36 30 440 8531.

Legal basis of data processing: consent of the User, Point a) of Paragraph (1) of Article 6, Subsection (1) Section 5 of the Infotv, and Subsection (7) of Section 17/A of Act CLV of 1997 on Consumer Protection.

We inform you that providing your personal data is required to manage your complaint. As a result of the failure of providing data, we will not be able to manage your complaint received by us.

4.3. Contacting ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság

At the website of ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság, the visitor may contact ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság by the contacting means indicated at the website (telephone, email, post).

The legal basis of the present data processing is the consent of the data subject [in accordance with

Point a) of Subsection (1) of Section 5 and Subsection (6) of Section 6 of the Infotv], prescribing that “for any other case initiated upon the request of the data subject, the consent of the data subject shall be considered granted regarding the provided personal data”.

Data controlling registration number: NAIH-113958/2017

Purpose of data processing: to make contacting ATC-Trade Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság easier

Scope of processed data: name, email address, subject, text of message

Legal basis of data processing: Point a) of Subsection (1) of Section 5 of the Infotv. Deadline

of data storage: the resolution of the matter subject to the case of contacting (completion of the purpose), Method of data storage: electronic

5. Matters not regulated by this document: Any matter not regulated by this document shall be governed by the rules established by the Infotv.