Privacy Policy

Date of acceptance: 2022-05-28

Data controller

Name: Galco Rope Manufacturee and Distributor Ltd.

Headquarters: 2700 Cegléd, Szarka utca 2.

Mailing address, complaint handling: 2701 Cegléd, Pesti út 210

E-mail: webshop@galco.hu

Phone: +3653310772, +36205231365

Website: http://www.galco.hu

Hosting

Name: FlashNet telecommunications service provider Ltd..

Mailing address, complaint handling:: 2700 Cegléd, Damjanich utca 8. B Iépcsőház fszt. 3.

E-mail: info@flash-net.hu

Phone: 06-80-804-080

Description of data processing during the operation of the webshop

This document contains all relevant data management information regarding the operation of the webshop in accordance with the European Union's General Data Protection Regulation No. 2016/679 (hereinafter: Regulation, GDPR) and CXII of 2011. TV. (hereinafter: Infotv.) based on

Information about the use of cookies

What is the cookie?

The Data Controller uses so-called cookies when visiting the website. The cookie is an information package consisting of letters and numbers that our website sends to your browser with the aim of saving certain settings, facilitating the use of our website and helping us to collect some relevant, statistical information about our visitors. Some of the cookies do not contain personal information and are not suitable for identifying the individual user, but some of them contain an individual identifier - a secret, randomly generated string of numbers - which is stored on your device, thereby

ensuring your identification. The operational duration of each cookie is contained in the relevant description of each cookie. A cookie-k jogszabályi háttere és jogalapja:

The legal basis for data management is your consent based on Article 6, paragraph (1) point a) of the Regulation.

The main characteristics of the cookies used by the website:

- Cookies strictly necessary for operation: These cookies are essential for the use of the website and enable the use of the basic functions of the website. In the absence of these, many functions of the site will not be available to you. The lifetime of these types of cookies is limited to the duration of the session.
- If you do not accept the use of cookies, certain functions will not be available to you. You can find more information about deleting cookies at the following links
- Internet Explorer: http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11
- Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
- Mozilla: https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito
- Safari: https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac
- Chrome: https://support.google.com/chrome/answer/95647
- Edge: https://support.microsoft.com/hu-hu/help/4027947/microsoft-edge-delete-cookies

Data processed for the purpose of concluding and fulfilling the contract

In order to conclude and fulfill the contract, several cases of data management may be implemented. We would like to inform you that data processing related to complaint handling and warranty administration is only carried out if you exercise one of the aforementioned rights.

If you do not make a purchase through the webshop, but are only a visitor to the webshop, then the provisions of data management for marketing purposes may apply to you if you give us consent for marketing purposes.

The data processing carried out for the purpose of concluding and fulfilling the contract in more detail:

Contact

If, for example, you contact us with a question about a product by email, contact form, or phone. Prior contact is not mandatory, you can skip this and order from the webshop at any time.

Managed data

During data management, the Data Controller manages your name, address (optional), telephone number, and e-mail address.

Duration of data management

We process the data until the contact is completed.

Legal basis for data management

Your voluntary consent, which you give to the Data Controller by contacting us. [Data management according to Article 6 (1) point a) of the Regulation]

Register on website

By storing the data entered during registration, the Data Controller can provide a more convenient service (e.g. the data subject does not have to be entered again when making a new purchase). Registration is not a condition for concluding a contract.

Managed data

The data controller manages your name, address, telephone number, e-mail address, the name of the purchased product and the date of purchase.

Duration

of data management We process your data until you withdraw your consent.

Legal basis for data management

Your voluntary consent, which you give to the Data Controller by registering [Data management according to Article 6 (1) point a) of the Regulation]

Order processing

During the processing of orders, data management activities are necessary in order to fulfill the contract.

Managed data

During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product, the order number and the date of purchase.

If you have placed an order in the webshop, data management and the provision of data are essential for the fulfillment of the contract.

Duration

of data management We process data for 5 years according to the statute of limitations in civil law.

The legal basis for data management is

the fulfillment of the contract. [Data management according to Article 6 (1) point b) of the Regulation]

Issue of the invoice

The data management process takes place in order to issue an invoice in accordance with the legislation and to fulfill the obligation to preserve accounting documents. The Sztv. Pursuant to § 169, paragraphs (1)-(2), economic companies must keep the accounting documents directly and indirectly supporting the accounting.

Managed data

During data management, the Data Controller manages your name, address, telephone number, and e-mail address.

Duration of data management

The issued invoices are subject to Sztv. Based on § 169, paragraph (2), it must be kept for 8 years from the date of issue of the invoice.

Legal basis for data management

Article CXXVII of 2007 on general sales tax. On the basis of Section 159 (1), the issuance of the invoice is mandatory and it must be kept for 8 years on the basis of Section 169 (2) of Act C of 2000 on accounting [Data processing according to Article 6 (1) point c) of the Regulation].

Data management related to the delivery of goods

The data management process takes place in order to deliver the ordered product.

Managed data

During data management, the Data Controller manages your name, address, telephone number, and e-mail address.

Duration of data management

The Data Controller manages the data until the delivery of the ordered goods.

The legal basis for data management is

the performance of a contract [data management according to Article 6 (1) point b) of the Regulation].

Recipients and data processors of data processing related to the delivery of goods

Name of recipient: GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.

of the addressee: 2351 Alsónémedi, GLS Európa u. 2.

Recipient's phone number: 06-29-88-67-00

Recipient's e-mail address: info@gls-hungary.com

The addressee's website: https://gls-group.eu/HU/hu/home

The courier service contributes to the delivery of the ordered goods based on the contract concluded with the Data Controller. The courier service handles the personal data received in accordance with the data management information available on its website.

Management of warranty and guarantee claims

Warranty and guarantee claims are covered by Art. 19/2014. (IV. 29.) We must act according to the rules of the NGM decree, which also determines how we must handle your claim.

Managed data

19/2014 when handling warranty and guarantee claims. (IV. 29.) We must act according to the rules of the NGM decree.

On the basis of the decree, we are obliged to take a record of the warranty or guarantee claim notified to us, in which we record:

- a. your name, address, and a statement that you consent to the processing of your data recorded in the protocol in accordance with the regulations,
- b. the name and purchase price of the movable item sold within the framework of the contract between you and us,
- c. the date of performance of the contract,
- d. the date of notification of the error,
- e. description of the error,

- f. the right you want to enforce based on your warranty or guarantee claim, and
- g. the method of settlement of the warranty or guarantee claim or the reason for rejecting the claim or the right to be asserted based on it.

If we receive the purchased product from you, we must issue a receipt for this, on which it must be stated

- a. your name and address,
- b. data necessary to identify the thing,
- c. the date of receipt of the item, as well
- d. the time when you can receive the repaired item.

Duration of data management

The company is obliged to keep the record of the consumer's warranty or guarantee claim for three years from the date of its recording, and to present it at the request of the inspection authority.

Legal basis for data management

The legal basis for data management is 19/2014. (IV. 29.) NGM decree [4. Compliance with legal obligations under § (1) and § 6 (1)] [Data management according to Article 6 (1) point c) of the Regulation].

Handling of other consumer protection complaints

The data management process takes place in order to handle consumer protection complaints. If you have contacted us with a complaint, data management and the provision of data are essential.

Managed data

Customer name, phone number, email address, content of complaint.

Duration of data management

Warranty complaints are kept for 5 years based on the Act on Consumer Protection.

The legal basis for data management

Whether you file a complaint with us is your voluntary decision, however, if you file a complaint with us, the CLV of 1997 on consumer protection. Act 17/A. § (7) we are obliged to keep the complaint for 5 years [data management according to Article 6 (1) point c) of the Regulation].

Data processed in relation to the verifiability of consent

During the registration, order, and subscription to the newsletter, the IT system stores the IT data related to the consent for later provability.

Processed data

Date of consent and IP address of the person concerned.

Duration of data management

Due to legal requirements, the consent must be proven later, therefore the data storage period is stored for a period of limitation after the end of data management.

Legal basis for data management

Article 7 (1) of the Regulation prescribes this obligation. [Data management according to Article 6 (1) point c) of the Regulation]

Data management for marketing purposes

Data management related to sending newsletters

The data management process takes place in order to send out newsletters.

Managed data

Name, address, e-mail address, telephone number.

Duration of data management Until the data

subject's consent is revoked.

Legal basis for data management

Your voluntary consent, which you give to the Data Controller by subscribing to the newsletter [Data management according to Article 6 (1) point a) of the Regulation]

Additional data management

If the Data Controller wishes to carry out further data processing, it provides preliminary information on the essential circumstances of data processing (legal background and legal basis of data processing, purpose of data processing, scope of data processed, duration of data processing).

Recipients of personal data

Data processing for the storage of personal data

Name of the data processor: FlashNet Távközlési szolgáltató Kft.

Contact details of the data processor:

Phone number: 06-80-804-080

E-mail address: info@flash-net.hu

Headquarters: 2700 Cegléd, Damjanich utca 8. B Iépsőház fszt. 3.

Website: https://flash-net.hu/

The Data Processor stores personal data based on the contract concluded with the Data Controller. You are not entitled to access personal data.

Data processing activity related to sending newsletters

Name of the company operating the newsletter system: IT-Nav Hungary Limited Liability Company Newsletter Giant

Headquarters of the company operating the newsletter system: 3300 Eger, Hatvani kapu tér 8, 3, em. 21.

Telephone number of the company operating the newsletter system: 06-20-580-0489

Email address of the company operating the newsletter system: info@it-nav.hu

Website of the company operating the newsletter system: www.itnav.hu http://hirlevelorias.hu/

The Data Processor participates in the sending of newsletters based on the contract concluded with the Data Controller. In doing so, the Data Processor processes the data subject's name and e-mail address to the extent necessary for the newsletter.

Accounting-related data management

Name of the data processor: CONTO KFT

The seat of the data processor is: 2700. CEGLÉD TELEKI UTCA 38

The phone number of the data processor: 06-53-505-550

The e-mail address of the data processor is: conto@conto.hu

Website of the data processor:

Based on a written contract with the Data Controller, the Data Processor participates in the bookkeeping of accounting documents. In doing so, the Data Processor will provide the name and address of the data subject to the extent necessary for accounting records, Sztv. It is

processed for a period of time in accordance with paragraph (2) of § 169, after which it is deleted immediately.

Invoicing-related data processing

Name of the data processor: Kulcs-Soft Nyrt.

The seat of the data processor is: 1016 Budapest, Mészáros u. 13.

The phone number of the data processor is: 06 1 336 53 00

The e-mail address of the data processor is: info@kulcs-soft.hu

Website of the data processor: www.kulcs-soft.hu

Based on the contract concluded with the Data Controller, the Data Processor participates in the registration of accounting documents. In doing so, the Data Processor will provide the name and address of the data subject to the extent necessary for accounting records, Sztv. It is processed for a period corresponding to paragraph (2) of § 169, after which it is deleted.

Data management related to online payment

Name of the data controller: Barion Payment Zrt

The registered office of the data controller is: 1117 Budapest, Infopark sétány 1.

The telephone number of the data controller is +36 1 464 70 99

The e-mail address of the data controller:

Website of the data controller: www.barion.com

Based on the contract concluded with the Data Controller, the payment service provider participates in the implementation of online payment, for which data is transferred to the online payment service provider during the purchase process. In doing so, the online payment service provider handles the invoicing name, name and address, order number and date of the concerned person in accordance with its own data management rules.

The purpose of the data transmission is to provide the online payment service provider with the transaction data necessary for the payment transaction initiated by the online payment service provider.

The legal basis for data transmission: the fulfillment of the contract between you and the Data Controller pursuant to Article 6 (1) point b) of the Regulation, which includes payment by the customer, and in the case of online payment, data transmission in accordance with this point is required for payment

Your rights during data management

Within the period of data management, you are entitled to the following rights according to the provisions of the Regulation:

- the right to withdraw consent
- access to personal data and information about data management
- right to rectification
- restriction of data management,
- right to erasure
- right to protest
- right to portability.

If you wish to exercise your rights, it involves your identification, and the Data Controller must necessarily communicate with you. Therefore, for the purpose of identification, it will be necessary to provide personal data (but the identification can only be based on data that the Data Controller manages about you anyway), and your complaints about data management will be available in the Data Controller's email account within the period specified in this information regarding complaints. If you were a customer of ours and would like to identify yourself in order to handle complaints or warranty, please enter your order ID for identification. Using this, we can also identify you as a customer.

The Data Controller will respond to complaints related to data management within 30 days at the latest.

The right to withdraw consent

You have the right to withdraw your consent to data management at any time, in which case the data provided will be deleted from our systems. However, please note that in the case of an order that has not yet been fulfilled, the cancellation may result in us not being able to deliver to you. In addition, if the purchase has already been completed, based on the accounting regulations, we cannot delete the data related to invoicing from our systems, and if you owe us a debt, then based on a legitimate interest related to the collection of the claim, we can process your data even if you withdraw your consent.

Access to personal data

You are entitled to receive feedback from the Data Controller as to whether your personal data is being processed, and if it is being processed, you are entitled to:

- get access to the processed personal data and
- inform the Data Controller of the following information:
 - o the purposes of data management;
 - o categories of personal data processed about you;
 - o information about the recipients or categories of recipients to whom the personal data has been or will be communicated by the Data Controller;
 - o the planned period of storage of personal data or, if this is not possible, the criteria for determining this period;
 - your right to request from the Data Controller the correction, deletion or restriction of processing of your personal data and, in the case of data processing based on legitimate interests, to object to the processing of such personal data;

- o the right to submit a complaint to the supervisory authority;
- if the data was not collected from you, any available information about its source;
- about the fact of automated decision-making (if such a procedure is used), including profiling, as well as, at least in these cases, comprehensible information about the logic used and the significance of such data management and the expected consequences for you.

The purpose of exercising the right may be aimed at establishing and checking the legality of data management, therefore, in case of multiple requests for information, the Data Controller may charge a fair fee in exchange for providing the information.

Access to personal data is ensured by the Data Controller by sending you the processed personal data and information by email after your identification. If you have registered, we provide access so that you can view and check your personal data by logging into your user account.

Please indicate in your request that you are requesting access to personal data or information related to data management.

Right to rectification

You have the right to request that the Data Controller correct inaccurate personal data concerning you without delay.

Right to restriction of data processing

You have the right to request that the Data Controller restrict data processing if one of the following is true:

- You dispute the accuracy of the personal data, in which case the restriction applies to the period that allows the Data Controller to check the accuracy of the personal data, if the exact data can be determined immediately, the restriction will not apply;
- the data management is illegal, but you oppose the deletion of the data for any reason (for example, because the data are important to you in order to assert a legal claim), therefore you do not request the deletion of the data, but instead request the restriction of their use;
- The Data Controller no longer needs the personal data for the purpose of the indicated data management, but you require them to submit, enforce or defend legal claims; obsession
- You objected to the data processing, but the Data Controller's legitimate interests may also justify the data processing, in this case until it is established whether the Data Controller's legitimate reasons take precedence over your legitimate reasons, the data processing must be limited.

If data management is subject to restrictions, such personal data may only be processed with the consent of the data subject, with the exception of storage, or to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the Union or a member state.

The data controller will inform you in advance (at least 3 working days before the restriction is lifted) of the lifting of the restriction on data management.

Right to erasure - right to be forgotten

You are entitled to have the Data Manager delete your personal data without undue delay if one of the following reasons exists:

- the personal data are no longer needed for the purpose for which they were collected or otherwise processed by the Data Controller;
- You withdraw your consent and there is no other legal basis for data processing;
- You object to data processing based on legitimate interest and there is no overriding legitimate reason (i.e. legitimate interest) for data processing,
- the personal data was handled illegally by the Data Controller and this was established based on the complaint,
- personal data must be deleted in order to fulfill the legal obligation prescribed by EU or member state law applicable to the Data Controller.

If, for any legitimate reason, the Data Controller has made public the personal data processed about you and is obliged to delete it for any of the above-mentioned reasons, it is obliged to take the reasonably expected steps - including technical measures - taking into account the available technology and the implementation costs, in order to inform the data controller and other data controllers that you have requested the deletion of the links to the personal data in question or the copy or duplicate of this personal data.

Deletion does not apply if data management is necessary:

- for the purpose of exercising the right to freedom of expression and information;
- fulfilling the obligation under the EU or Member State law applicable to the data controller requiring the processing of personal data (such a case is data processing carried out in the context of invoicing, as the retention of the invoice is required by law), or for the purpose of performing a task carried out in the public interest or in the exercise of public authority granted to the data controller;
- for the presentation, enforcement and protection of legal claims (e.g. if the Data Controller has a claim against you and has not yet fulfilled it, or a consumer or data management complaint is in progress).

Right to protest

You have the right to object to the processing of your personal data based on legitimate interests at any time for reasons related to your own situation. In this case, the Data Controller may no longer process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the presentation, enforcement or defense of legal claims .

If personal data is processed for direct business acquisition, you have the right to object at any time to the processing of your personal data for this purpose, including profiling, if it is related to direct business acquisition. If you object to the processing of personal data for direct business purposes, then the personal data may no longer be processed for this purpose.

Right to portability

If the data management is carried out in an automated way or if the data management is based on your voluntary consent, you have the right to ask the Data Controller to receive the data you have provided to the Data Controller, which the Data Controller sends in xml, JSON or csv format at your disposal, if this is technically feasible, you can request that the Data Controller forward the data in this form to another data controller.

Automated decision making

You have the right not to be subject to the scope of a decision based solely on automated data management (including profiling) that would have legal effects on you or would similarly significantly affect you. In these cases, the Data Controller is obliged to take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention on the part of the data controller, to express his point of view and to submit objections to the decision.

The above does not apply if the decision:

- Necessary to conclude or fulfill the contract between you and the Data Controller;
- is made possible by EU or member state law applicable to the Data Controller, which also establishes appropriate measures for the protection of your rights and freedoms, as well as your legitimate interests; obsession
- based on your express consent.

Registration in the data protection register

Infotv. pursuant to its provisions, the Data Controller had to register certain data operations in the data protection register. This reporting obligation was terminated on May 25, 2018.

NAIH number registered before May 25, 2018:

Data protection registration number: Complaint handling data management registration number: NAIH-113902/2017.

NAIH number registered before May 25, 2018:

Additional data protection registration number: Registration number for data management related to regular customer registration: NAIH-113898/2017.

NAIH number registered before May 25, 2018:

 $\label{lem:additional} \textbf{Additional data protection registration number}: Registration number for data management related to sending the newsletter: NAIH-113900/2017.$

NAIH number registered before May 25, 2018:

Additional data protection registration number: Registration number for data management related to presence on social media sites: NAIH-113901/2017.

NAIH number registered before May 25, 2018:

Additional data protection registration number: Registration number for data management related to the evaluation system: NAIH-117444/2017.

Data security measures

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, as well as against becoming inaccessible due to changes in the technology used.

The Data Controller will do everything within its organizational and technical capabilities to ensure that its Data Processors also take appropriate data security measures when working with your personal data.

Remedies

If, in your opinion, the Data Controller has violated a legal provision relating to data management, or has not fulfilled any of your requests, you can initiate the investigation procedure of the National Data Protection and Freedom of Information Authority in order to terminate alleged illegal data management (address: 1363 Budapest, Pf. 9., e-mail: ugyfelszolgalat@naih.hu, phone numbers: +36 (30) 683-5969 +36 (30) 549-6838; +36 (1) 391 1400).

We would also like to inform you that in the event of a violation of the legal provisions on data management, or if the Data Controller has not fulfilled any of your requests, you may file a civil lawsuit against the Data Controller in court.

Modification of data management information

The Data Controller reserves the right to modify this data management information in a way that does not affect the purpose and legal basis of data management. By using the website after the amendment enters into force, you accept the amended data management information.

If the Data Controller wishes to carry out further data processing in relation to the collected data for a purpose other than the purpose of their collection, it will inform you of the purpose of the data processing and the following information before the further data processing:

- on the period of storage of personal data, or if this is not possible, on the criteria for determining the period;
- of your right to request from the Data Controller access to your personal data, their correction, deletion or restriction of processing, and in the case of data processing based on legitimate interest, you may object to the processing of personal data, and in the case of data processing based on consent or a contractual relationship, you may request data portability provision of rights;
- in the case of data management based on consent, that you can withdraw your consent at any time,
- on the right to submit a complaint to the supervisory authority;
- about whether the provision of personal data is based on legislation or a contractual obligation or is a prerequisite for concluding a contract, as well as whether you are obliged to provide personal data, as well as the possible consequences of failure to provide data;

• about the fact of automated decision-making (if such a procedure is used), including profiling, as well as, at least in these cases, comprehensible information about the logic used and the significance of such data management and the expected consequences for you.

The data processing can only start after this, if the legal basis of the data processing is consent, in addition to the information, you must also consent to the data processing.