

Privacy Policy - Király Computer

1. General principles

- We collect and process personal data only in accordance with applicable laws.
- We transfer personal data to third parties only with consent.
- We do not sell the personal data processed by us to third parties under any circumstances.
- We store data as securely as possible.
- We only send newsletters to those who have given their prior and clear consent.
- Data subjects may request access to, modification or deletion of the data stored about them at any time.

2. Details and contact information of our company (data controller, Service Provider)

Name of the data controller: Király Computer Szerviz Kft.

Contact details of the data controller: 1068 Budapest, Király utca 72. Ground floor 1.

Phone: 06-20-494-9418

E-mail: info@kiralycomputer.hu, lendi@lendi.hu

Web: www.kiralycomputer.hu

Tax number: 32737820-2-42

The service provider reserves the right to amend this Privacy Policy, about which it will inform the data subjects in an appropriate manner. Information related to data processing is published on the **LINK GOES HERE** website.

3. Definitions according to the GDPR (Regulation)

3.1. data subject/User: any natural person identified or identifiable, directly or indirectly, on the basis of specific personal data;

3.2. personal data: data that can be associated with the data subject, in particular the name, identification mark of the data subject, and information relating to one or more physical, physiological, mental, economic, cultural or social characteristics of the data subject, as well as conclusions that can be drawn from such data concerning the data subject;

3.3. consent: the voluntary and definite expression of the data subject's wishes, based on appropriate information, by which the data subject gives their unambiguous agreement to the processing of personal data concerning them, either fully or for specific operations;

3.4. data controller: the natural or legal person, or organisation without legal personality, who or which independently or jointly with others determines the purpose of data processing, makes and implements decisions concerning data processing, including the tools used, or has them implemented by a data processor;

3.5. data processing: any operation or set of operations performed on data, regardless of the procedure applied, including in particular collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, blocking, deletion and destruction, as well as preventing further use of the data, taking photographs, audio or video recordings, and recording physical characteristics suitable for identifying a person, such as fingerprints, palm prints, DNA samples or iris images;

3.6. **data transfer:** making data available to a specified third party;

3.7. **disclosure:** making data available to anyone;

3.8. **data deletion:** making data unrecognisable in such a way that restoration is no longer possible;

3.9. **data processing activity:** performing technical tasks related to data processing operations, regardless of the method and means used to carry out the operations, as well as the place of application, provided that the technical task is performed on the data;

3.10. **data processor:** the natural or legal person, or organisation without legal personality, who or which processes data on the basis of a contract, including a contract concluded pursuant to a legal provision;

3.11. **data breach:** unlawful processing or handling of personal data, in particular unauthorised access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction and damage.

4. Scope of processed data, purpose and duration of data processing, and data processor

Type of processed data	Purpose of data processing	Duration of data processing	Legal basis of data processing	Processor of the given personal data
Username	Identification, registration.	Until consent is withdrawn	Consent of the data subject.	
Password	Secure login to the user account.	Until consent is withdrawn	Consent of the data subject.	
Name	Contact, coordination of arising questions.	Until consent is withdrawn	Consent of the data subject.	
E-mail address	Contact, coordination of arising questions.	Until consent is withdrawn	Consent of the data subject.	
Phone number	Contact, coordination of arising questions.	Until consent is withdrawn	Consent of the data subject.	

Billing name and address	Issuing a proper invoice, creating and then fulfilling the contract.	We process the data for 5 years according to the civil law limitation period.	Issuing an invoice is mandatory pursuant to Section 159 (1) of Act CXXVII of 2007 on Value Added Tax, and pursuant to Section 169 (2) of Act C of 2000 on Accounting.
Delivery name and address	Enabling home delivery.	Until delivery of the ordered goods.	Performance of the contract. [Data processing according to Article 6 (1) b) of the Regulation]
Date of purchase/registration	Proof of consent.	Until the limitation period following the termination of data processing	This obligation is prescribed by Article 7 (1) of the Regulation. [Data processing according to Article 6 (1) c) of the Regulation]
IP address at the time of purchase/registration	Proof of consent.	Until the limitation period following the termination of data processing	This obligation is prescribed by Article 7 (1) of the Regulation. [Data processing according to Article 6 (1) c) of the Regulation]

Scope of data subjects: All data subjects registered on / purchasing through the webshop website.

Personal data are shared only and exclusively with the third party indicated in the "Processor of the given personal data" column, for the purpose of fulfilling the obligations set out in the contract.

Details and tasks of data processors used during data processing

Hosting provider

Name: InfoNetfort Kft.

Address: 7900 Szigetvár, Szent István ltp 17. IV/25.

Phone: +36-30/530-2953

E-mail: kapcsolat@netfort.hu

Web: www.netfort.hu

Tax number: 26648082-2-02

Company registration number: 02 09 084205

Accounting tasks

Courier service

Direct marketing, newsletter

Name:

Address:

4.1 Contact form:

Type of processed data	Purpose of data processing	Duration of data processing	Legal basis of data processing
Name	Contact	For 90 days after the data subject's last contact	Consent of the data subject during contact
E-mail address	Contact	For 90 days after the data subject's last contact	Consent of the data subject during contact
Phone number	Contact	For 90 days after the data subject's last contact	Consent of the data subject during contact
Other personal data provided by the data subject during contact		For 90 days after the data subject's last contact	Consent of the data subject during contact

Scope of data subjects: Persons contacting us by phone, e-mail or through the contact form.

We do not share personal data with third parties.

5. Newsletter, direct marketing activity

We send newsletters only to Users who have given their prior and express consent. Consent is given using the "Newsletter subscription" form.

Type of processed data	Purpose of data processing	Duration of data processing	Legal basis of data processing
Name	Sending newsletters	Until withdrawal (unsubscribe).	Consent of the data subject
E-mail address	Sending newsletters	Until withdrawal (unsubscribe).	Consent of the data subject
Time of consent and the data subject's IP address.	Verifiability of consent	Until withdrawal (unsubscribe).	This obligation is prescribed by Article 7 (1) of the Regulation.

Scope of data subjects: All data subjects subscribed to the newsletter.

The operator of the newsletter sending system and the data processor:

Name: Király Computer Szerviz Kft.

Address: 1068 Budapest, Király utca 72. Ground floor 1.

5.1 Procedure for withdrawing consent (unsubscribe)

The data subject may unsubscribe from the newsletter at any time, free of charge. Unsubscription may take place using the link sent in newsletters, or by sending an e-mail to info@kiralycomputer.hu.

6. Handling of cookies

6.1 What is a cookie?

During visits to the website, the Data Controller uses so-called cookies. A cookie is an information package made up of letters and numbers, which our website sends to the data subject's browser in order to save certain settings, make the use of our website easier, and help us collect certain relevant statistical information about our visitors. Cookies do not contain personal information and are not suitable for identifying individual users. Cookies often contain a unique identifier, a secret randomly generated string of numbers, which is stored on the data subject's device.

Some cookies expire after the website is closed, while others are stored on your computer for a longer period.

6.2. Legal background and legal basis for cookie handling

Cookies typical of webshops include so-called "password-protected session cookies", "cookies required for the shopping cart" and "security cookies", the use of which does not require prior consent from data subjects.

Fact of data processing and scope of processed data: unique identification number, dates, times

Scope of data subjects: All data subjects visiting the website.

Purpose of data processing: Identification of users, tracking of visitors.

Legal basis of data processing: consent of the data subject in accordance with Section 5 (1) a) of the Info Act.

6.3 Duration of data processing, deadline for deleting data: the website uses the following cookies:

- Security cookies: __cfduid, _biz_flagsA, _biz_nA 3, _biz_pendingA, _biz_sid, _biz_uid
- Google Analytics cookies: _ga, _gid
- Cookies required for proper use of the site:

Possible data controllers entitled to access the data: the data controller does not process personal data through the use of cookies.

Description of data subjects' rights related to data processing: Data subjects have the option to delete cookies in the Tools/Settings menu of browsers, usually under the Privacy settings. If the data subject does not accept the use of cookies, certain functions will not be available to them. Further information on deleting cookies is available at the following links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: https://support.apple.com/kb/ph21411?locale=en_US

7. Google Analytics

7.1. This website uses Google Analytics, a web analytics service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer and help analyse the use of the website visited by the User.

7.2. The information generated by cookies related to the website used by the User is usually transferred to and stored on one of Google's servers in the USA. By activating IP anonymisation on the website, Google shortens the User's IP address beforehand within the Member States of the European Union or in other states party to the Agreement on the European Economic Area.

7.3. The full IP address is transferred to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the User used the website, to prepare reports for the website operator related to website activity, and to perform further services related to website and internet use.

7.4. The IP address transmitted by the User's browser within the framework of Google Analytics is not combined with other data by Google. The User may prevent the storage of cookies by selecting the appropriate settings in their browser; however, please note that in this case some functions of this website may not be fully usable. The User may also prevent Google from collecting and processing data related to the User's website use through cookies, including the IP address, by downloading and installing the browser plugin available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=hu>

8. Google Adwords conversion tracking and remarketing

8.1. The data controller uses the online advertising programme called "Google AdWords" and, within its framework, uses Google's conversion tracking service. Google conversion tracking is an analytics service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

8.2. When a User reaches a website through a Google advertisement, a cookie required for conversion tracking is placed on their computer. These cookies have limited validity and do not contain any personal data, so the User cannot be identified through them.

8.3. When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller can see that the User clicked on the advertisement.

8.4. Each Google AdWords customer receives a different cookie, so they cannot be tracked through the websites of AdWords customers.

8.5. The information obtained with the help of conversion tracking cookies serves the purpose of preparing conversion statistics for customers who choose AdWords conversion tracking. Customers are informed about the number of users who clicked on their advertisement and were forwarded to a page equipped with a conversion tracking tag. However, they do not receive information that could identify any user.

8.6. If you do not wish to participate in conversion tracking, you can refuse this by disabling the installation of cookies in your browser. After this, the data subject will not be included in the conversion tracking statistics.

8.7. Further information and Google's privacy policy are available at:

www.google.de/policies/privacy/

8.8. Google Adwords Remarketing

8.9. Data processing as remarketing activity is carried out with the help of cookies.

Processed data

Data processed by the cookies specified in the cookie notice.

Duration of data processing

The data storage duration of the given cookie; further information is available here:

Google general cookie notice: <https://www.google.com/policies/technologies/types/>

Google Analytics notice:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>

Legal basis of data processing

The voluntary consent of the data subject, which the data subject gives to the service provider by

using the website.

9. Rights of data subjects

9.1 Right to information

At the request of the data subject, the Service Provider, as data controller, provides information about the data processed by it or by the processor commissioned by it, the source of such data, the purpose, legal basis and duration of data processing, the name and address of the data processor and its activity related to data processing, the circumstances, effects of a data breach and the measures taken to remedy it, as well as, in the case of data transfer, its legal basis and recipient. The data controller provides the information in an understandable form, in writing upon the data subject's request, within the shortest possible time from submission of the request, but no later than within 30 days. This information is free of charge if the person requesting information has not yet submitted a request for information to the data controller concerning the same data scope in the current year. In other cases, the Service Provider may determine a cost reimbursement.

9.2 Right to rectification

The Service Provider rectifies personal data if it does not correspond to reality and the correct personal data is available to it.

9.3 Right to blocking

The Service Provider blocks personal data if the data subject requests this, or if, based on the information available to it, it can be assumed that deletion would harm the legitimate interests of the data subject. Blocked personal data may be processed only as long as the data processing purpose that excluded deletion of the personal data exists. The Service Provider marks the personal data processed by it if the data subject disputes its correctness or accuracy, but the incorrectness or inaccuracy of the disputed personal data cannot be clearly established.

9.4 Right to deletion

The Service Provider deletes personal data if its processing is unlawful, the data subject requests it, the processed data is incomplete or incorrect and this condition cannot be lawfully remedied, provided that deletion is not excluded by law, the purpose of data processing has ceased, or the statutory deadline for storing the data has expired, or deletion has been ordered by a court or the National Authority for Data Protection and Freedom of Information.

9.5 Procedural rules

The data controller has 30 days to delete, block or rectify personal data. If the data controller does not fulfil the data subject's request for rectification, blocking or deletion, it shall communicate the reasons for refusal in writing or, with the data subject's consent, electronically within 30 days. The Service Provider informs the data subject, as well as all those to whom the data was previously transferred for data processing purposes, about the rectification, blocking, marking and deletion. Notification may be omitted if this does not harm the legitimate interest of the data subject with regard to the purpose of data processing.

9.6 Objection

The data subject may object to the processing of their personal data if

- a) the processing or transfer of personal data is necessary solely for fulfilling a legal obligation applicable to the data controller or for enforcing the legitimate interest of the data controller, the data recipient or a third party, unless the data processing was ordered by law;
- b) in other cases specified by law.

The Service Provider examines the objection within the shortest possible time from submission of the request, but no later than within 15 days, makes a decision on its merits, and informs the applicant of its decision in writing. If the data controller establishes that the data subject's objection is well-founded, it terminates the data processing, including further data collection and

data transfer, and blocks the data, and informs all those to whom the personal data affected by the objection was previously transferred, and who are obliged to take measures to enforce the right to object, about the objection and the measures taken on its basis.

If the data subject does not agree with the decision made by the data controller, they may turn to court within 30 days from communication of the decision.

The Service Provider may not delete the data subject's data if data processing was ordered by law. However, the data may not be transferred to the data recipient if the data controller agreed with the objection, or if the court established the legitimacy of the objection.

9.7. Right to data portability

If data processing is carried out by automated means, or if data processing is based on the data subject's voluntary consent, the data subject has the right to request from the Data Controller the data provided by the data subject to the Data Controller, which the Data Controller shall provide to the data subject in XML, JSON or CSV format, and, if technically feasible, the data subject may request that the Data Controller transmit the data in this format to another data controller.

9.8 Compensation and damages for non-material harm

The Service Provider compensates damage caused to others by unlawful processing of the data subject's data or by breach of data security requirements. In the event of infringement of the data subject's personality rights, the data subject may claim damages for non-material harm (Civil Code Section 2:52). The data controller is also liable towards the data subject for damage caused by the data processor. The data controller is exempt from liability if the damage was caused by an unavoidable reason outside the scope of data processing.

The data controller shall not compensate damage and damages for non-material harm may not be claimed to the extent that the damage or the infringement caused by violation of personality rights resulted from the intentional or grossly negligent conduct of the injured party or the data subject.

9.9 Right to turn to court

In the event of violation of their rights, the data subject may turn to court against the data controller. The court shall proceed in the case out of turn.

9.10 Complaint

A complaint may be lodged with the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

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

Phone: +361/391-1400

Fax: +361/391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

10. Data security

The service provider designs and carries out data processing operations in such a way as to ensure the protection of the privacy of data subjects.

The service provider and, within its scope of activity, the data processor ensure the security of the data, take the technical and organisational measures and establish the procedural rules necessary to enforce the Info Act and other data and confidentiality protection rules.

The service provider protects data with appropriate measures, in particular against unauthorised access, alteration, transfer, disclosure, deletion or destruction, as well as accidental

destruction and damage, and against becoming inaccessible due to changes in the technology used.

During data processing, the service provider preserves:

- confidentiality: it protects information so that only those authorised can access it
- integrity: it protects the accuracy and completeness of the information and the processing method
- availability: it ensures that when an authorised user needs it, they can actually access the desired information and that the related tools are available.

The IT systems and networks of the service provider and its partners involved in data processing are protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, computer intrusions and denial-of-service attacks. The operator ensures security through server-level and application-level protection procedures.

11. Applicable laws used for the Privacy Policy

- Act CXII of 2011 – on Informational Self-Determination and Freedom of Information (Info Act)
- Act V of 2013 – on the Civil Code (Civil Code)
- Act CLV of 1997 – on Consumer Protection
- Act XIX of 1998 – on Criminal Procedure
- Act CVIII of 2001 – on Electronic Commerce Services and Certain Issues Related to Information Society Services
- Act C of 2003 – on Electronic Communications
- Act XLVIII of 2008 – on the Basic Conditions and Certain Restrictions of Economic Advertising Activity
- Recommendation of the National Authority for Data Protection and Freedom of Information on the data protection requirements of prior information
- GDPR, Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing and protection of personal data of natural persons and on the free movement of such data

01.06.2026