

Privacy Policy

The Rati Kft. as data manager (hereinafter referred to as Data Manager) agrees to be bound by the content of this legal notice. The Data Manager undertakes the obligation that all data management processes related to its activities comply with the requirements set forth in this regulation and the applicable legislation.

The purpose of these regulations is that the rights, the fundamental right for freedom, in particular, the right to privacy are ensured for all individuals (hereinafter referred to as User) during the automatic and/or manual data processing (data protection) within all ranges of services provided by the Rati Kft., without regard to the individual's nationality or place of residence.

The data management by the Data Manager is carried out in accordance with Subsection a) Section (1) Article 5 of Act CXII. of 2011 on the right of informational self-determination and on freedom of information (hereinafter referred to as Act on Information) on the basis of voluntary approval by the Users and in accordance with Act CVIII. of 2001 on certain aspects of e-commerce services and services relating to the information society. The contribution with respect to each data processing procedure is provided by the User through using the Website, by the registration and the voluntary provision of the data in issue.

Data Manager shall respect the personal rights of the Users of the web shop www.rati-shop.hu and shall manage the personal data entered by the User as confidential information, in compliance with legislation and international recommendations on data protection and in accordance with this Privacy Policy.

The User, by using the web shop shall accept the following and shall contribute to the data management procedure as described below.

1. Definitions:

- a. **Concerned person/User:** any physical person, identified or identifiable on the basis of the personal information provided directly or indirectly;
- b. **Personal data:** the data that can be related to the concerned person – in particular, the name and identification number of the concerned person, and one or more data characteristic of the person's physical, physiological, mental, economic, cultural or social identity and knowledge – or any conclusion that can be deduced from such information;
- c. **Contribution:** voluntary and determined expression of the will of the concerned person, which is based on information provided appropriately, and with which the concerned person gives unambiguous consent to the management of the concerning personal data either generally or for certain operations;

- d. **Objection:** the statement of the concerned person, in which objects the management of the personal data and calls for the termination of data management and cancellation of the managed data;
- e. **Data Manager:** the physical or legal person or entity without legal personality - in this case the Data Manager - who or which individually or jointly with others determines the purpose of the data management, makes decisions on data processing (including the equipment used) and implements the related decisions or enforces their implementation by a data processor commissioned by the Data Manager;
- f. **Data management:** irrespective of the method applied, any operation or a set of operations performed on the data, in particular, their collection, recording, organization, storage, alteration, use, querying, transmission, disclosure, alignment or combination, blocking, erasure or destruction, as well as prevention of data re-use, taking photo, audio or video records and recording physical characteristics suitable for purposes of identification of individuals (e.g. fingerprints, palm prints, DNA samples and iris images);
- g. **Data Processing:** performance of technical tasks related to data processing operations, irrespective of the method and device applied to perform the operations and the place of application, provided that the technical tasks are performed on the data;
- h. **Data Processor:** natural or legal person or entity without legal personality who or which, under contract with the Data Manager - including the execution of contract under the provisions of the legislation – processes the data;
- i. **Data transfer:** making the data available for a certain third party;
- j. **Disclosure:** making the data available to anyone;
- k. **Data deletion:** making the data unrecognizable in such a way that their restoration is no longer possible;
- l. **Data blockage:** addition of an identification code to the data in order to finally or permanently limit their further management;
- m. **Data destruction:** total physical destruction of the media storing the data;
- n. **Third person:** any natural or legal person or entity without legal personality who or which is not identical to the concerned person, the Data Manager or the Data Processor;

2. **Name of Data Manager :**

Name: **RATI Kft.**

Registered office and mailing address: 7300 Koml6, Nagyr6t utca 2.

Company registration number: 02-09-064760

Registering Court: Court of Registration of the Court of Justice of Pécs
VAT number: 11542935-2-02
Email address: webshop@rati.hu

The Data Manager shall accept the complaints and comments associated with its data management to the above mentioned e-mail address only and the User can request the correction, deletion and blocking of the data and information in relation to the data management.

3. Purpose of data management:

The Data Manager shall store the data made available by the User solely for the designated purpose and for the performance of the contract, sending newsletters and the later performance of the conditions of the contract. The Data Manager shall not use the personal information for purposes other than stated herein.

4. Duration of data management:

The management of the personal data provided during the registration process shall be commenced with the registration and terminated with its deletion. This applies both to the data provided as mandatory and the data provided voluntarily as well.

The registration may be deleted by the User and may be deleted by the Data Manager at any time and in a manner as set out in the General Terms and Conditions. (GTC Section 4.1.6.2.)

In case of a request to cancel the registration, the **Data Manager** deletes the registration and at the same time the personal data from the system, within 2 working days of receiving the request. If the User cancels the registration itself, the data will be automatically deleted from the **Data Manager's** system.

After the cancellation, the User's data are permanently deleted from the Data Manager's system, which data are no more possible to be recovered, that means new registration is required.

In case of purchase without registration, upon the fulfilment of the order, the User's data are deleted from the system.

These provisions shall not affect the performance of certain retention obligations imposed by law (for example, the obligation to keep the invoices, set forth in specific regulations on accounting), as well as data management during the registration on the website or otherwise on the basis of the additional contributions.

The logged data – with the exception of the date of the last visit, which is automatically overwritten – are stored by the system for 6 months from the date of logging.

5. Range of managed data

5.1. Registration: During registration the User shall provide the following mandatory personal information:

- last name
- first name
- E-mail address
- password

After entering the data, the **Data Manager** shall notify the User on the successful registration in e-mail.

After registration, the User can enter additional data on a voluntary basis, provided that they are necessary for the performance, provision of the service by the **Data Manager**.

5.2. Cookie

The computers of the Website's visitors' are identified by so called cookies. In order to make all content accessible on the **Data Manager**'s Website, the User is required to authorise the cookies. Accordingly, when the certain parts of the Website are downloaded, cookies are placed on the User's computer, which are necessary for the operation of certain features of the Website.

A cookie is a small text file that is saved to your computer and browser. On the completion of this the User receives no further notification from the Data Manager.

The cookies used on the site www.rati-shop.com do not cause any damage to the User's computer and do not contain viruses.

In the menu bar of most of the browsers a "Help" function can be found, that provides information related to how can the User

- disable the cookies
- accept new cookies or
- instruct the browser to set a new cookie, or
- turn off the other cookies.

in the User's browser

The Data Manager uses two types of cookies:

- Temporary (session) cookie: the session cookies are automatically deleted after the User's visit. These cookies are used for the more efficient and safer operation of the **Data Manager**'s Website, that is, they are indispensable for the proper operation of some functions of the Website or some applications.

- Permanent (persistent) cookies: the **Data Manager** uses permanent cookies in the interest of providing a better user experience (e.g. to provide optimal navigation). These cookies are stored in the browser's cookie file for long periods of time. The period of this depends on the setting applied by the User on the web browser. With the help of these cookies, the **Data Manager** collects anonymous data for marketing and optimization purposes. These data are intended by the **Data Manager** to identify the specific needs of specific user groups, and to assist the **Data Manager** to deliver the relevant information for the Users in a more customised manner. The data shall not be used by the **Data Manager** to identify the User personally. Naturally, the User may prohibit the use of the data this way any time through any contacts of the **Data Manager** as stated above.
- The cookies are unsuitable for identifying the User's personally and are valid only for a session. The purpose of placing the cookies by the **Data Manager's** is that it can deliver the relevant information for the visitors in a more customised manner.
- This aforementioned information shall be used by the **Data Manager** solely for the technical operation of the **Website**, sending targeted newsletters and for statistical purposes.

5.3. Technical data: During browsing the Website, technical information is recorded (e.g. in the form of log files, which contain the User's IP address, the date, the URL of visited page).

In our Server Log files such information is stored, which is transferred to the Service Provider by the User. These are the following:

- referrer URL (the URL of the previously visited page)
- browser type / version
- used operating system
- IP address
- the exact time of the server

The logging of these data is carried out by the system continuously, but it is associated with the data provided during the registration or the use. The Data Manager may record the data of those internet pages as well, from which the User has reached the Website, and of those which were visited on the Website, as well as the time and duration of the visit. The data obtained this way are not available for the Users, only for the Data Manager. This information is used by the Data Manager only for the technical operation of the Website and for statistical purposes.

6. The range of the persons cognising the data

Primarily, the **Data Manager** and the **Data Manager's** internal staff shall be entitled to view the data, who shall not be entitled to publish or transfer them to third parties, and shall be entitled and can use them only for the purposes specified in the Privacy Policy.

With the purpose of the operating the underlying information system, fulfilling the orders and settling the accounts, the **Data Manager** can employ a data processor (e.g. system operator, accountant). The **Data Manager** shall not be responsible for the privacy practices of such external parties.

7. Data processing

The **Data Manager**, with the purpose of fulfilling the orders, (e.g. delivery) shall employ a data processor, which shall carry out data processing under a contract with the **Data Manager**. The data processing shall be carried out solely for purposes specified by the **Data Manager**, the personal data provided by the User shall not be used for purposes other than specified by the Data Manager.

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

Registered Office: 2351 Alsónémedi, GLS Európa u. 2.

Postal address: 2351 Alsónémedi, GLS Európa u. 2.

E-mail address: info@gls-hungary.com

The choice of partners by the **Data Management** was preceded by thorough preparation and its partners shall be obliged to manage the data obtained during performing their duties and providing the services in compliance with the statutory provisions and the standards of data protection.

8. Data security

The **Data Manager** shall take all necessary steps to ensure the security of the personal data provided by the Users on the Website during network communications, data storage and safekeeping.

The access to the personal data is strictly limited with respect to unauthorized cognition, unauthorized alteration of personal data, and in order to prevent unauthorized use of the personal data.

9. User's rights and legal remedies

9.1 Right to information

You always have the right to request information on the personal data managed by and concerning the **Data Manager**, and - with the exception of the e-mail address specified in the registration - to change them at any time as provided in the General Terms and Conditions.

If the User requests so, the **Data Manager** shall provide information on the data regarding the User and managed by the **Data Manager**, on the purpose of data management, on its legal basis and duration, as well as on that to whom and for what purpose are the data transferred. The

Data Manager provides the requested information in writing within 30 days of the filing of the request.

The User may apply to any question or notice related to data management to the staff-members of the **Data Manager** through the contact details provided below.

9.2 Data correction, blocking, submitting a request for cancellation by the User

The User shall be entitled to request for the **correction** or **deletion** of the data provided incorrectly at any time, through the contact details provided below. The **Data Manager** deletes the data within 5 working days of the receipt of the request, in which case the data will not be possible to be restored. The cancellation does not apply to the data management required by the legislation (e.g. regulation of accounting), these data are stored by the **Data Manager** for the required time period.

In addition, the Users can request for the **blocking** of the data. The **Data Manager** blocks the personal data if the user requests so, or if it can be assumed on the basis of the available information, that the deletion of the data would harm the legitimate interests of the User. The personal data blocked this way shall only be manageable as long as the purpose of data management exists, which excluded the deletion of the personal data.

On the correction, blocking and deletion, the User, and all those shall be notified to whom the data had been transferred with the purpose of data management. The notification may be omitted, provided if does not violate the legitimate interests of the User with respect to the purpose of data management.

If the **Data Manager** fails to perform or cannot perform the User's request for correction, blocking or deletion, it shall communicate the factual and legal reasons for the denial of the request for the correction, blocking or deletion in writing, within 30 days of receipt of the request.

9.3 The User may **object** the personal data management. The **Data Manager** shall inspect the objection within the shortest possible period after its submission, but no later than 15 days, and shall adopt a decision on its validity and inform the applicant on its decision in writing.

The User's rights may be exercised at the following addresses:

Name: RATI KFT.
Postal address: 7300 Komló, Nagyrét utca 2.
E-mail: webshop@rati.hu

9.4 The User, under the Act on Information and the Civil Code (Act IV. of 1959)

1. May submit request to the Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/c.; www.naih.hu).

2. Enforce the User's rights in court, or

Inasmuch the User, when using the service provides the data of a third party, or causes damage in any way when using the Website, the **Data Manager** shall be entitled to enforce compensation claim against the User. The **Data Manager** in this case shall provide all possible support for the competent authorities in order to establish the identity of the offender.

Use of E-mail addresses

The **Data Manager** shall pay special attention to the legitimacy of using the e-mail addresses it manages, therefor it shall use them only in the manner set out below (for information, advertising or market research purposes) in order to send an email.

The management of e-mail addresses shall serve for the identification of the User and keeping contact during the provision of the services, therefore e-mails shall be sent primarily to that effect.

10. Newsletter

The **Data Manager** shall enable the User to subscribe to the newsletter at the same time when registering to the Website. The newsletter provides direct marketing elements and contains advertisements. When providing the newsletters, the **Data Manager** shall manage the data specified by the User. The **Data Manager** shall send letters containing promotion or advertisement (newsletter) to the electronic mail addresses specified during the registration only with the User's expressed consent, in accordance with the legal requirements in the cases and manner as set out therein, that is, if the User ticks the sign box next to the text "Sign Up for Newsletter".

The User may unsubscribe from receiving newsletters without any limitation or justification, at any time, free of charge. This can be performed by mail, e-mail, or clicking on the link 'Unsubscribe' at the bottom of the newsletters. In this case, the **Data Manager** shall delete the User's all personal data – necessary for sending newsletters – from the register of newsletters and shall send no more offers or newsletters to the User.

11. Miscellaneous provisions

The purpose of registration with Facebook and Google+ is that the **Data Manager** can facilitate the process of registration. The Facebook or Google+ user name and password provided by the User during the registration shall not be subject to technical actions by the **Data Manager**, who shall manage such data as personal data and with the purpose as set forth in Section 3.

The **Data Manager** reserves the right to amend this Privacy Policy unilaterally with prior notice to the user. Following the entry into force of the amendments, the User accepts the provisions of the Privacy Policy as amended through using the services, with tacit approval.

Inasmuch the User provides the data of a third party when registering to the Website or registering to the Newsletter, or causes damage in any way when using the Website, the **Data Manager** shall be entitled to enforce compensation claims against the User. The **Data**

Management in this case shall provide all possible support for the competent authorities in order to establish the identity of the offender.

The **Data Manager** does not inspect the personal data provided for it. The person providing the data shall be exclusively responsible for its authenticity. Any User, at the same time when entering an email address, shall undertake the responsibility for that only the User shall use the services the specified e-mail address. With respect to this liability, any liability associated with the entries to the specified e-mail addresses shall be borne solely by the User who registered the e-mail address.

The registered User, through using the Website shall also undertake the responsibility for that the content, data, information provided, editable by the User and displayed on the Website shall not violate the rights or legitimate interests of any third-party or the **Data Manager**.

The **Data Manager**, in the cases above shall provide all possible support for the competent authorities in order to establish the identity of the offender. The **Data Manager**, in the cases above, or in case of non-compliance with the General Terms and Conditions shall be entitled to cancel the User's registration and newsletter subscription, in which case the **Data Manager** shall not be liable for any damage of the User resulting from deletion the data.

This Privacy Policy shall enter into force on 02/09/2013.