

## **PRIVACY POLICY**

### **to website**

**This Privacy Policy contains the rules for the handling of the necessary personal data. Please do not use this website if you do not agree with these rules. This Policy is an integral part of the Company's general terms and conditions, so acceptance of the General Terms and Conditions also means acceptance of this Policy.**

**In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, GDPR) and the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: "Infotv.")**

Data controller

Company name: Cecz Central-European Llc.

Representatives: Zheng Shaomin és Wang Dongxia

Address: 1152 Budapest., Szentmihályi út 171. Hungary

Tax nr: 23462098-2-42

Email: [info@cecz.eu](mailto:info@cecz.eu)

Website operated by the Company: [www.cecz.eu](http://www.cecz.eu) – not adapted for the blind and partially sighted persons

The company does not have a data protection officer.

**The Companies are managing the personal data described in the sections people concerned in the data protection, aim and length of data protection.**

Profiling: Company does not do profiling data management

Our company uses cookies on its website. You should read this policy so you can

understand what type of cookies we use, the information we collect using cookies and how that information is used.

During your visit on our website, we will send one or more cookies (small text files) on your device, which individually identify your browser. These cookies are provided by Google and are used through the Google Adwords system. Cookies will be sent to your device only when visiting specific subpages. Hence, we only store the fact and the date of your visit in these cookies, without any further information.

We use these cookies in the following way. External service providers, such as Google, use these cookies for storing the information that the user has already visited the website of the advertiser and display advertisements for the user on the websites of the external service providers, including Google. Users can disable the cookies of Google on the Google webpage for turning off advertisements. (This may also indicate to users that they can disable the cookies of external providers of the unsubscribe website of the Network Advertising Initiative.)

We use the following cookies:

- analytical, tracking cookies
- cookies for tracking via the website
- login, user identification cookies

The Help function found in the menu of most browsers provides information about how you can:

- disable the cookies in your browser
- accept new cookies
- command your browser to set up a new cookie or to disable other cookies
- how to turn off other cookies.

The Company does not collect personal data on its website.

- **The legal basis for data management**

Our company does not use any profile-building data management and does not collect any personal information on its website. If a contract is concluded, the data management is needed for the performance of the contract or by virtue of law. The supplying of data is voluntary, and the person concerned is not required to grant his or her consent to the data management. It should be noted, however, that without supplying the necessary data, the Company is not able to enter into business relationships or continue its business relationships with him or her.

In other cases, the provision of data is voluntary, and the revocation of the approval to the data management does not affect the legitimacy of former data management.

- **The range of persons involved (data subject), the purpose and duration of data management**

The data management covers the data of all registered sellers and buyers, visitors of the website, users of the services and facilitators of the website (concerned parties). The Company handles personal data (regarding the purposefulness of data collection) exclusively in order to provide the services and payments determined in the management contract for the concerned parties.

### **The principles and method of data management**

- The Company will handle all data processing according to the requirements of good faith, fairness and transparency, in collaboration with the involved parties. The Company will only manage the data required by law or supplied by the concerned parties, for the purposes specified below. The scope of the personal data that is processed is proportionate to the objective of the data management and may not exceed its limits.
- Whenever the Company wishes to use the personal data for other purposes than those for which they were collected, it will inform the concerned parties about this fact and obtain their prior explicit consent or provide the opportunity for them to prohibit the use of their data.
- The company does not check the provided data for their adequacy. The person supplying the data is solely responsible for this aspect.
- For people aged under 16, personal data may only be managed with the consent of the adult exercising parental responsibility. It does not rely in the power of the Company to control the right of the consenting person or the content of his

or her statement. Hence, the person concerned or the person exercising parental control over him or her guarantees for the legal compliance of the statement. In lack of this declaration of consent, the Company will process the data of natural persons under 16 exclusively based on legal provisions or if the data management is of general interest or necessary for the completion of tasks assigned to the Company in exercise of public powers, or if the Company has a legitimate interest in the processing of the data.

- The Company will not transfer the personal data that are handled by it to any third parties outside the data processors specified in the present Privacy Policy and it may only transfer them to the third parties specified as external service providers, in the cases referred to in the present Privacy Policy. The use of data in statistically aggregated form is excepted from the provisions of this paragraph. These data may not contain any element that could serve to individually identify the concerned party, which is, in fact, not considered data management or data transfer.

In some cases, the Company will make available to third parties the available personal data of the concerned person. The cases may include official court and police inquiries, legal proceedings due to copyright, property rights or others infringements, respectively if there are reasonable grounds for the suspicion of such infringement, in cases of prejudice to the legitimate interests of the company, the endangerment of the service's insurance etc.

The Company will notify the person concerned about any correction, limitation or deletion of the managed personal data, as well as the parties to who it has forwarded the personal data for purposes of data management. Such notification may be omitted if it does not prejudice the legitimate interests of the person concerned regarding the purpose of the data management.

The Company manages personal data exclusively for specified purposes, in order to exercise certain rights and fulfil specific obligations. The data management process is in accordance with these purposes at each of its stages. The recording and management of the data is done fairly and lawfully. The Company aspires to only handle personal data strictly necessary and suitable for achieving the purpose of the data management. The personal data may only be managed to the extent and for the duration of realizing this purpose.

The Company manages the following data:

<b>Type of data</b>	<b>Purpose and reason of data management</b>	<b>Length of data management</b>
photos, videos on the business website / request for quotes from customers, other people (total images without consent, close-up photos with contributions)	on the basis of voluntary consent, documentation, presentation of the activity to the interested	pending the withdrawal of individual contributions from the involved persons
name of newsletter subscribers, e-mail, date of subscription	on the basis of voluntary contribution information providing due to voluntary approval, contacting	from subscribing to unsubscribing, or 3 months after sending the last data correction email if the e-mail sent for correcting the data did not receive any active answer
the name / online image / online voice of the user of the website chat service, the start and end date of using the service	on the basis of voluntary contribution, business information, contact	3 years after each chat service

<p>personal information of the users of the company social network page (not closed group) name and public profile picture of the willingly registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram/Linkedin etc. social networks</p>	<p>providing information and contacting all the Involved who willingly registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram/Linkedin etc. social networks and „liked” the webpage of the Company</p>	<p>the Involved can gain information on the certain social page about the source of data, data management and way of transmitting; the data management is being realized on the social media, so the own regulation of the social page defines the period, way and cancellation and modification of the data</p>
<p>in case of authorisation: personal information of the empowered: name, address, ID type and number of the person acting instead of and in the name of the Involved</p>	<p>due to voluntary permission the arrangement of the case of the Involved</p>	<p>5 years after closing the case</p>
<p>in case of complaint: name, address, ID type and number of the person filing liability claim or complaint</p>	<p>due to legal procedure the assessment of the claim/complaint</p>	<p>5 years after posting the answer</p>
<p>for persons with an agency contract with cecz.eu; private person / sole proprietor's family and forename, email address, telephone number, address or registered office, bank account number, unique partner code provided by Cecz.eu</p>	<p>creating a contract, keeping in touch</p>	<p>8 years after cancelling the framework contract or fulfilling the occasional mandate (accounting preservation)</p>

for persons with an agency contract with Cecz.eu : name of natural person who represents a company, e-mail, phone number, unique partner code provided by Cecz.eu	creating a contract, keeping in touch	8 years after cancelling the framework contract or fulfilling the occasional mandate (accounting preservation)
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Supplying the data necessary for concluding the contract represents a condition for the provision of the services included in the contract. In lack of these data or if you subsequently request their deletion, the service cannot be will not be available. Supplying of other data is on a voluntary basis. The withdrawal of consent to the data management does not affect the legitimacy of previous data management.

- **The persons involved in data processing**

**The persons entitled to data management** are the employees and representatives of the COMPANY, holding special entitlements.

- **Regarding the data transmission and data processing**

The Company is entitled to engage the services of a data processor. The data processors will not take any individual decisions, but are only entitled to proceed on the basis of the contract and of the instructions received from the Company. The Company as data manager will verify the work of the data processors. The data processors are only entitled to employ the services of further data processors with the consent of the data manager.

The Company has a data processor. The data processors of the Company are identified in this Privacy Policy.

The Company is forwarding data to the lawyer dealing with legal issues: Dr. Füzi Tamás, Szalay u. 5/b. II. 3. Budapest, HU-1055

Server provider: Tárhely.Eu Kft. 1144, Budapest Ormánság u. 4.

Operator of the Company website: **Gemic Consulting LLC** Representative:

**Kökény Viktória** Base of company: 2636 Tésa. Petőfi utca 16.

News letters forwardig via MailChimp (Ponce City Market, Atlanta, Georgia, USA

- **The rights of the affected parties regarding the management of their personal data**

The right to information: at the request of the affected person, the Company is required to supply information that is easy to find and is of the appropriate size and in a suitable and clear language, about the relevant aspect of the data management (who manages what data, how and from when to when).

The right to access: the private person may request information about whether there is any data management relating to him or her as well as about the data that is managed.

Requesting the correction of data: the affected person may indicate that the data relating to him or her is inaccurate and request the correct data to be indicated. The responsibility for the correctness of the data lies with the data processor. Hence, it is advisable to periodically check the data for accuracy.

The right to deletion: the affected person may at any time ask for the deletion of his or her data. If the affected person has granted access to any third person to the data that is required to be deleted, he or she has to inform about this everyone to whom he or she has disclosed the data, in for all references and stored personal data to be deleted.

The right to the restriction of data processing: in some cases, the person affected by the management of his or her personal data may request the restriction of the management of his or her data, e.g., in situations that are unclear or involve legal disputes or if the data processing is no longer necessary, but the subject would still prefer it to continue.



The right to data portability: the affected person may request access to the data in clearly structured, widely used and device-readable forms (e.g. doc, pdf etc.) and is entitled to forward these data to another data manager without being hindered by the original data manager. In other words, the situation of the person affected by the data management is made easier regarding the transfer of his or her data from one data manager to another.

The right to protestation: the affected person is entitled to object at anytime to the management of his or her data, for reasons related to his or her specific situation. This is typically the case when the affected person did not give his or her assent to the data management.

The right to the withdrawal of consent: the affected person is entitled to withdraw his or her consent anytime. The withdrawal of consent does not affect the legitimacy of the data management based on consent from before the withdrawal.

The affected person may ask for his or her rights regarding the data to be exercised through addressing a declaration to the data manager, either verbally or in writing, through post, email or the website – preferably through the forum through which the data manager has received the data. In the case of a verbal request, a minute about the request should be recorded and a copy of the minute should be handed over to the concerned person.

If the affected person has any complaints about the data management, we recommend that it be first by the data manager, i.e., the Company. The data manager has 25 calendar days at his disposal to examine and respond to the complaint. If the concerned person upholds the complaint, he or she can turn to the tribunal (the competent court of Budapest) or to the Hungarian National Authority for Data Protection and Freedom of Information.

Contact details:

Mailing address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) - (customer service)

URL <http://naih.hu>

Coordinates: North 47°30'56"; East 18°59'57"

The official language of the website is English. If there is a discrepancy between the English and other parts of the language, the English language is always the guiding principle.

This Privacy Policy may be modified by the Company. The current version is always accessible on the Company's website.

Budapest, 06 October 2020

Cecz Central-European Llc