

## Data Processing Information Notice

### Introduction

Romsics Sándor ev. (2030 Érd, Zengő utca 35., Registration number: 59435325, tax number: 90276741-2-41) (hereinafter: Service Provider, data controller) submits itself to the following notice. In accordance with Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (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 processing notice governs the data processing of the following websites:  
<https://creannafabrics.com>

The data processing notice is available at the following page:  
<https://creannafabrics.com/info/adatkezelesitajekoztato-2/>

Amendments to this notice shall enter into force upon publication at the above address.

### The data controller and its contact details:

Name: Romsics Sándor ev.

Registered office: 2030 Érd, Zengő utca 35.

E-mail: [romsics65@gmail.com](mailto:romsics65@gmail.com)

Telephone: +36 20/5668882

### Definitions

1. “personal data”: any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. “processing”: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. “controller”: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State

law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

4. “processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

5. “recipient”: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall comply with the applicable data protection rules according to the purposes of the processing;

6. “the data subject’s consent”: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

7. “personal data breach”: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

## Principles relating to processing of personal data

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”);
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (“purpose limitation”);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimisation”);
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1), subject to implementation of appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (“storage limitation”);

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).

The controller shall be responsible for, and be able to demonstrate compliance with, the above (“accountability”).

## Processing activities

### Processing related to operating the web shop

1. The fact of data collection, the scope of data processed and the purpose of processing:

Personal data	Purpose of processing
Password	Serves secure login to the user account.
Surname and given name	Required for contacting you, for purchasing, and for issuing a proper invoice.
E-mail address	Keeping in contact.
Telephone number	Keeping in contact; more efficient consultation of billing or delivery-related questions.
Billing name and address	Issuance of a proper invoice; furthermore, establishing the contract, determining its content, modifying it, monitoring its performance, invoicing fees arising from it, and enforcing related claims.
Shipping name and address	Enabling home delivery.
Time of purchase/registration	Performing a technical operation.
IP address at the time of purchase/registration	Performing a technical operation.

In the case of the e-mail address, it is not necessary that it contain personal data.

2. Data subjects concerned: all data subjects who are registered/purchasers on the web shop website.

3. Duration of processing, deadline for deletion of data: immediately upon deletion of the registration. Except for accounting documents, as pursuant to Section 169(2) of Act C of 2000 on Accounting, these data must be retained for 8 years.

*“Accounting documents directly and indirectly supporting bookkeeping records (including general ledger accounts and analytical and detailed registers) must be retained in a legible form for at least 8 years, in a manner that can be retrieved based on references in the bookkeeping records.”*

4. Possible persons entitled to access the data, recipients of personal data: personal data may be processed by the controller’s sales and marketing employees, with respect for the above principles.

5. Description of the data subjects’ rights in relation to processing: the data subject may request from the controller access to personal data concerning him or her, rectification, erasure or restriction of processing, and may object to such processing, and the data subject has the right to data portability and to withdraw consent at any time.

6. Access to personal data, deletion, modification, restriction of processing, data portability and objection to processing can be initiated by the data subject as follows: by post to 2030 Érd, Zengő utca 35.; by e-mail to romsics65@gmail.com; by phone at +36 20/5668882.

7. Legal basis of processing:

7.1 The data subject’s consent, Article 6(1)(a), Section 5(1) of the Infotv.

7.2 Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (hereinafter: Eker tv.):

*“For the purpose of providing the service, the service provider may process personal data that are technically indispensable for the provision of the service. Subject to the equivalence of other conditions, the service provider must choose and, in all cases, operate the tools applied in the provision of information society services in such a way that personal data are processed only if this is strictly necessary for the provision of the service and for the fulfilment of other purposes set out in this Act, and even then only to the extent and for the time necessary.”*

7.3 In the case of issuing an invoice in accordance with accounting legislation, Article 6(1)(c).

We inform you that:

- processing is based on your consent;
- you are required to provide personal data so that we can fulfil your order;
- failure to provide the data will result in the consequence that we will not be able to process your order.

## **Data processors used**

### **Delivery**

1. Activity performed by the processor: delivery and carriage of products.

2. Name and contact details of the processor: Magyar Posta Zrt., Customer Service Directorate, 3512 Miskolc, [https://www.posta.hu/adatkezesesi\\_tajekoztato#2](https://www.posta.hu/adatkezesesi_tajekoztato#2).

3. The fact of processing, scope of processed data: shipping name, shipping address, telephone number, e-mail address.

4. Data subjects concerned: all data subjects requesting home delivery.

5. Purpose of processing: delivery of the ordered product to the home address.

6. Duration of processing, deadline for deletion: lasts until completion of the home delivery.

7. Legal basis of processing: the User's consent, Article 6(1)(a), Section 5(1) of the Infotv.

#### **Web shop software provider**

1. Activity performed by the processor: maintenance of the web shop software.

2. Name and contact details of the processor: WEBHASZON Enterprise. Horváth Lászlóné EV. Tax number: 41924026-1-40, 8800 Nagykánizsa, Varazsdi utca 32. E-mail: [ugyfel@webaruhazberlese.hu](mailto:ugyfel@webaruhazberlese.hu). Telephone: 30/854-9598. Website: <https://www.webaruhazberlese.hu/>

3. The fact of processing, scope of processed data: all personal data provided by the data subject.

4. Data subjects concerned: all data subjects using the website.

5. Purpose of processing: proper operation of the web shop software.

6. Duration of processing, deadline for deletion: until termination of the agreement between the controller and the software maintainer, or until the data subject's deletion request addressed to the software maintainer.

7. Legal basis of processing: the User's consent, Section 5(1) of the Infotv., Article 6(1)(a), and Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

#### **Hosting provider**

1. Activity performed by the processor: hosting service.

2. Name and contact details of the processor: Cweb.hu Informatikai Kft. Address: 1173 Budapest, Borsó utca 12-32. Company registration number: Cg.01-09 436264. Tax number: 32666032-1-42. Telephone: +36-70-282-7206. E-mail: [info@cweb.hu](mailto:info@cweb.hu)

3. The fact of processing, scope of processed data: all personal data provided by the data subject.

4. Data subjects concerned: all data subjects using the website.
5. Purpose of processing: making the website available and ensuring proper operation.
6. Duration of processing, deadline for deletion: until termination of the agreement between the controller and the hosting provider, or until the data subject's deletion request addressed to the hosting provider.
7. Legal basis of processing: the User's consent, Section 5(1) of the Infotv., Article 6(1)(a), and Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

#### Bank card acceptor

Online bank card and other payment methods are implemented through the Barion system. Bank card and other payment-related data do not reach the merchant. The service provider, Barion Payment Zrt., is an institution supervised by the Hungarian National Bank; its licence number is: H-EN-I-1064/2013.

#### Cookies

1. Cookies typical for web shops are the so-called "cookie used for password-protected session", "cookies necessary for the shopping cart" and "security cookies", the use of which does not require prior consent from the data subjects.
2. The fact of processing, scope of processed data: unique identification number, dates, times.
3. Data subjects concerned: all data subjects visiting the website.
4. Purpose of processing: identifying users, maintaining the "shopping cart", and tracking visitors.
5. Duration of processing, deadline for deletion:

Cookie type	Legal basis of processing	Duration of processing	Scope of data processed
Session cookies (session)	Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Eker tv.) Section 13/A(3)	The period lasting until the relevant visitor session is closed	connect.sid

6. Possible persons entitled to access the data: by using cookies, the controller does not process personal data.

7. Description of the data subjects' rights in relation to processing: data subjects have the possibility to delete cookies in browsers, generally under the Tools/Settings menu, under the Privacy settings.

8. Legal basis of processing: the data subject's consent is not required if the exclusive purpose of using cookies is the transmission of communication over an electronic communications network, or if the service provider strictly needs them to provide an information society service explicitly requested by the subscriber or user.

### Newsletter, DM activity

1. Pursuant to Section 6 of Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activity, the User may, in advance and expressly, consent to the Service Provider contacting him or her with advertising offers and other mailings at the contact details provided upon registration.

2. Furthermore, taking into account the provisions of this notice, the Customer may consent to the Service Provider processing the personal data necessary for sending advertising offers.

3. The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from receiving offers free of charge, without restriction and without justification. In this case, the Service Provider deletes from its records all personal data necessary for sending advertising messages and will not contact the User with further advertising offers. The User may unsubscribe from advertisements by clicking the link in the message.

4. The fact of data collection, the scope of data processed and the purpose of processing:

Personal data	Purpose of processing
Name, e-mail address.	Identification; enabling subscription to the newsletter.
Time of subscription	Performing a technical operation.
IP address at the time of subscription	Performing a technical operation.

5. Data subjects concerned: all data subjects subscribing to the newsletter.

6. Purpose of processing: sending electronic messages containing advertisements (e-mail, SMS, push message) to the data subject; providing information on current information, products, promotions, new functions, etc.

7. Duration of processing, deadline for deletion: processing lasts until the withdrawal of the consent statement, i.e., until unsubscription.

8. Possible persons entitled to access the data, recipients of personal data: personal data may be processed by the controller's sales and marketing employees, with respect for the above principles.

9. Description of the data subjects' rights in relation to processing: the data subject may request from the controller access to personal data concerning him or her, rectification, erasure or restriction of processing, and may object to such processing, and the data subject has the right to data portability and to withdraw consent at any time.

10. Access to personal data, deletion, modification, restriction of processing, data portability and objection to processing can be initiated by the data subject as follows: by post to 2030 Érd, Zengő utca 35.; by e-mail to romsics65@gmail.com; by phone at +36 20/5668882.

11. The data subject may unsubscribe from the newsletter at any time, free of charge.

12. Legal basis of processing: the data subject's consent, Article 6(1)(a), Section 5(1) of the Infotv., and Section 6(5) of Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activity:

*"The advertiser, the advertising service provider and the publisher of the advertisement, within the scope defined in the consent, keep a register of the personal data of persons who have given a consent statement to them. The data recorded in this register relating to the recipient of the advertisement may be processed only in accordance with the consent statement, until it is withdrawn, and may be transferred to a third party exclusively with the prior consent of the data subject."*

13. We inform you that:

- processing is based on your consent;
- you are required to provide personal data if you wish to receive newsletters from us;
- failure to provide the data will result in the consequence that we will not be able to send you newsletters.

## Complaint handling

1. The fact of data collection, the scope of data processed and the purpose of processing:

Personal data	Purpose of processing
Surname and given name	Identification; keeping in contact.
E-mail address	Keeping in contact.
Telephone number	Keeping in contact.

Billing name and address

Identification; handling quality complaints, questions and problems arising in relation to the ordered products.

2. Data subjects concerned: all data subjects who purchase on the web shop website and who submit quality complaints and lodge complaints.

3. Duration of processing, deadline for deletion: copies of the minutes, transcript taken about the complaint and the response given thereto must be retained for 5 years pursuant to Section 17/A(7) of Act CLV of 1997 on consumer protection.

4. Possible persons entitled to access the data, recipients of personal data: personal data may be processed by the controller's sales and marketing employees, with respect for the above principles.

5. Description of the data subjects' rights in relation to processing: the data subject may request from the controller access to personal data concerning him or her, rectification, erasure or restriction of processing, and may object to such processing, and the data subject has the right to data portability and to withdraw consent at any time.

6. Access to personal data, deletion, modification, restriction of processing, data portability and objection to processing can be initiated by the data subject as follows: by post to 2030 Érd, Zengő utca 35.; by e-mail to romsics65@gmail.com; by phone at +36 20/5668882.

7. Legal basis of processing: the data subject's consent, Article 6(1)(c), Section 5(1) of the Infotv., and Section 17/A(7) of Act CLV of 1997 on consumer protection.

8. We inform you that:

- providing personal data is based on a contractual obligation;
- processing of personal data is a precondition for concluding the contract;
- you are required to provide personal data so that we can handle your complaint;
- failure to provide the data will result in the consequence that we will not be able to handle your complaint received by us.

### **Social media pages**

1. The fact of data collection, scope of processed data: the registered name on Facebook/Google+/Twitter/Pinterest/YouTube/Instagram etc. social media sites and the user's public profile picture.

2. Data subjects concerned: all data subjects who are registered on Facebook/Google+/Twitter/Pinterest/YouTube/Instagram etc. social media sites and have "liked" the website.

3. Purpose of data collection: sharing and/or “liking” and promoting certain content elements, products, promotions of the website, or the website itself, on social media pages.
4. Duration of processing, deadline for deletion, possible persons entitled to access the data and description of data subjects’ rights: the data subject can obtain information about the source of the data, their processing, the method of transfer and the legal basis on the given social media site. Processing takes place on social media sites; therefore, the duration, method, and possibilities for deleting and modifying data are governed by the rules of the given social media site.
5. Legal basis of processing: the data subject’s voluntary consent to the processing of his or her personal data on social media sites.

### **Customer relations and other processing**

1. If, during the use of the controller’s services, a question arises or the data subject has a problem, the data subject may contact the controller through the channels provided on the website (telephone, e-mail, social media pages, etc.).
2. The controller deletes incoming e-mails, messages, and data provided by phone, on Facebook, etc., together with the enquirer’s name and e-mail address, and other personal data provided voluntarily, no later than 2 years after the communication.
3. With respect to processing activities not listed in this notice, we provide information at the time of data collection.
4. In the event of an exceptional official request, and in the event of requests by other bodies based on statutory authorisation, the Service Provider is obliged to provide information, disclose and transfer data, and make documents available.
5. In these cases, the Service Provider shall provide personal data to the requesting party only to the extent and in a measure that is indispensable for achieving the purpose of the request, provided that the request has indicated the precise purpose and the scope of the data.

### **Rights of data subjects**

1. The right of access: You have the right to receive feedback from the controller as to whether your personal data are being processed, and, where that is the case, access to the personal data and to the information listed in the Regulation.
2. The right to rectification: You have the right to obtain from the controller, without undue delay, the rectification of inaccurate personal data concerning you. Taking into account the purposes of processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. The right to erasure: You have the right to obtain from the controller the erasure of personal data concerning you without undue delay, and the controller is obliged to erase personal data concerning you without undue delay under certain conditions.

4. The right to be forgotten: Where the controller has made the personal data public and is obliged to erase it, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers processing the data that you have requested the erasure of links to, or copies or replications of, those personal data.

5. The right to restriction of processing: You have the right to obtain from the controller restriction of processing where one of the following applies:

- accuracy;
- you contest the accuracy of the personal data, in which case the restriction applies for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;
- you have objected to processing; in such case, the restriction applies pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

6. The right to data portability: You have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (...)

7. The right to object: You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you (...), including profiling based on those provisions.

8. Objection in case of direct marketing: Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

9. Automated decision-making in individual cases, including profiling: You have the right not to be subject to a decision based solely on automated processing – including profiling – which produces legal effects concerning you or similarly significantly affects you. The previous paragraph shall not apply if the decision:

- is necessary for entering into, or performance of, a contract between you and the controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

### **Time limit for taking action**

The controller informs you without undue delay, but in any event within 1 month of receipt of the request, of the measures taken following the above requests.

If necessary, this may be extended by 2 months. The controller informs you of the extension of the time limit within 1 month of receipt of the request, stating the reasons for the delay.

If the controller does not take measures upon your request, it shall inform you without delay, but at the latest within one month of receipt of the request, of the reasons for failure to take action, and of the possibility that you may lodge a complaint with a supervisory authority and exercise your right to an effective judicial remedy.

### **Security of processing**

The controller and the processor, taking into account the state of the art and the costs of implementation, as well as the nature, scope, context and purposes of processing, and the risks of varying likelihood and severity for the rights and freedoms of natural persons, implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including, among others, as appropriate:

- pseudonymisation and encryption of personal data;
- ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of processing.

### **Information to the data subject about a personal data breach**

Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

In the communication to the data subject, the nature of the personal data breach must be described clearly and in plain language, and the name and contact details of the data protection officer or other contact point for more information must be provided; the likely consequences of the personal data breach must be described; and the measures taken or proposed to be

taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects, must be described.

The data subject shall not have to be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;
- it would involve disproportionate effort. In such a case, the data subjects shall be informed by means of a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

If the controller has not yet communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so.

### **Notification of a personal data breach to the authority**

The controller shall notify the personal data breach to the supervisory authority competent under Article 55 without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification is not made within 72 hours, it shall be accompanied by reasons for the delay.

### **Possibility to lodge a complaint**

In case of an alleged infringement by the controller, you may lodge a complaint with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

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

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

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

### **Closing**

When preparing this notice, we took into account the following legislation:

- 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) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (27 April 2016)
- Act CXII of 2011 – on the right of informational self-determination and on freedom of information (hereinafter: Infotv.)
- Act CVIII of 2001 – on certain issues of electronic commerce services and information society services (mainly Section 13/A)
- Act XLVII of 2008 – on the prohibition of unfair commercial practices against consumers;
- Act XLVIII of 2008 – on the basic conditions and certain limitations of economic advertising activity (in particular Section 6)
- Act XC of 2005 on electronic freedom of information
- Act C of 2003 on electronic communications (specifically Section 155)
- Opinion No. 16/2011 on the EASA/IAB recommendation on best practice for behavioural online advertising
- Recommendation of the National Authority for Data Protection and Freedom of Information on the data protection requirements of prior information
- Regulation (EU) 2016/679 of the European Parliament and of the Council (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

2026.03.14