

Data protection information

Dear Customer!

When you visit our Company's website, request a quote, place an order or send us a message, our Company processes personal data about you. Below we would like to provide you with the most important information about the processing of your personal data and your rights. If you have any further questions about the processing of your personal data, please feel free to contact us by e-mail at info@aquacrom.eu or by using the contact details of our Company set out below.

What does personal data mean?

Personal data is any data relating to an identified or identifiable natural person (data subject). For example, your name, address, date of birth, the content of a message you send us, or the details of your order are personal data.

Data of a non-natural person is not considered personal data. In other words, data relating to a company, institution, public office or association (such as the name of the company, contact details or the details of an order placed by a company) do not fall within the concept of personal data. Also excluded is data where the data subject cannot be identified, i.e. anonymised or statistical data.

Who processes your personal data?

AQUACROM PRODUKT Gyártó és Kereskedelmi Korlátolt Felelősségű Társaság

head office: 9028 Győr, Fehérvári u. 75.

company registration number: 08-09-021290

representative: Zsolt Károly Papp, managing director

telephone number: +36 96 433 032

Data Protection Officer: Zsolt Papp, Managing Director

e-mail: info@aquacrom.eu

(hereinafter referred to as "the Company")

What personal data does the Company process and for what purposes?

To prepare a quote, our Company will process your name, address (town, street, house number), contact details (phone number, e-mail address) and the content of the quote request (i.e. the product or service for which you have requested a quote). The purpose of the data processing is to identify the customer and to contact him/her in order to send him/her a quotation.

If you place an order for one of our products or services, we will process your name, address, contact details, the name, characteristics and content of the product or service ordered and the content of any additional requests you send to us in connection with your order in order to fulfil the order. In this case, the purpose of the processing is to ensure the accurate fulfilment of your order to the fullest extent possible and to keep in contact with you in order to inform you of the information and status of your order in relation to the product or service you have ordered. In order to fulfil the order, the Company will enter into a contract with you for the product or service ordered. In order to conclude

the contract, in addition to the information provided during the ordering process (listed above), you will be required to provide the following additional information: your place of residence, your mother's name, place and date of birth, and your identity document.

After the order has been fulfilled, our Company will issue you with an invoice or receipt for your order in accordance with the legislation in force. To issue the invoice, our Company will process your name, address, the name and price of the product or service ordered.

The Company's assembly employee shall take photographic documentation of the finished product, which shall depict the finished product at the assembly site in its environment. By taking these photographs, the Company and the reseller selling the Company's product shall document the contractual performance and shall keep the photographs in order to prevent future disputes and to prove the contractual performance. The processing of data in this respect is based on the Company's legitimate interest. With your consent, the Company may publish certain photographs on its website for reference.

If our Company provides a warranty for the product or service ordered or is legally obliged to provide a warranty, the Company will process your name, address, details of your order, the data content of the warranty ticket and/or invoice and the content of the warranty claim in order to fulfil the warranty claim (to determine the validity of the claim and to identify the product or service concerned).

In order to prevent future disputes or to prove the facts in the event of a dispute, the Company shall keep the personal data not deleted after the failure of the conclusion of the contract, the performance of the contract or the termination of the contract for five years after the failure of the conclusion of the contract or the termination of the contract, in accordance with the general limitation rules of Act V of 2013 on the Civil Code. The purpose of the processing of data under this clause is to enable the Company to enforce its rights and claims arising from the contract, and to defend itself in the event of such legal claims.

When you visit the website of our company, the website collects data about the visitors of the website in order to improve the services and to provide a better user experience, and for analytics purposes, the website places a short piece of code, a cookie, on the computer of the visitor. We inform the user of this fact when he first opens the site, and he can confirm that he has been informed and gives his consent to the processing of his data. The cookies placed by our website are stored on your computer and you can delete them at any time. You can delete cookies by using the instructions for Mozilla Firefox browser (<https://support.mozilla.org/hu/kb/weboldalal-altal-elhelyezett-sutik-torlese-szamito>), Chrome browser (https://support.google.com/chrome/answer/95647?hl=hu&ref_topic=7438325), Microsoft Edge browser (<https://privacy.microsoft.com/hu-hu/windows-10-microsoft-edge-and-privacy>).

The Company sends targeted advertisements to visitors to the website for remarketing purposes. It uses an external service (Google analytics, Facebook) to record the fact of visiting the website and to target the advertisements. The Company does not receive your data during the targeted marketing activities, which are only recorded by the external service provider. In this respect, the data processing information and policies of the external service provider shall apply.

The Company sends newsletters, marketing or advertising messages (hereinafter collectively referred to as "commercial messages") to natural persons only with the consent of the data subject. By subscribing to a commercial message (on the website, by e-mail or on paper), the data subject consents to the Company sending an electronic commercial message to the e-mail address he or she has provided. The purpose of the processing of the data related to the sending of commercial messages is

to provide the recipient with comprehensive general or personalised information about the latest promotions, products and news of the Company.

The personal data provided will be stored by the Company on a separate list, separately from the data provided to the Company for other purposes, and only the Company's authorised employees and data processors will have access to this list. The list or the data will not be disclosed to any unauthorised third party and all security measures will be taken to ensure that they cannot be disclosed to unauthorised persons.

The Company will only process the personal data collected for this purpose for as long as it wishes to inform you by means of a commercial message or until you unsubscribe from the commercial message list.

You can unsubscribe from the commercial message at any time by sending an unsubscribe request to info@aquacrom.eu.

You can subscribe to the newsletter by post to Aquacrom Kft. (9028 Győr, Fehérvári u. 75.).

The Company will organise a prize draw to promote its services and to encourage subscription to the newsletter. The prize draw is open to subscribers to the newsletter (on the Company's website and Facebook page) who register to participate. To participate in the competition, the following information is required:

- name;
- address;
- phone number;
- e-mail address.

The purpose of data processing is to encourage registration in the marketing database, to reward newsletter and marketing database subscribers, and to maintain contact so that the Company can deliver the prize to the winner. The processing of data related to the prize draw will continue until the end of the prize draw, and within 5 (five) working days after the end of the prize draw, the data processed in this way (with the exception of the winner's data) will be deleted. The Company shall store the winner's data for a period of time in accordance with the applicable tax and accounting regulations and shall delete them after the expiry of the time limit. Registration in the marketing database and the newsletter will not be affected at the end of the prize draw period. If you do not wish to receive any further marketing communications or newsletters from the Company, you can indicate this by clicking on the link in the newsletter or marketing communication or by sending a postal or electronic message to the Company. If you unsubscribe from the newsletter or marketing database before the winner of the prize draw is selected, you will not be eligible to participate in the prize draw.

What is the legal basis for processing?

- a) The legal basis for processing the personal data provided for the purposes of preparing a quotation is the preparation of a contract with you.
- b) In the case of personal data provided in the course of fulfilling an order, the legal basis for the processing is the performance of the contract (order) concluded with you.
- c) In the case of personal data provided for the purpose of issuing an invoice, the legal basis for processing is the fulfilment of a legal obligation to which the controller is subject.

- d) In the case of personal data provided for the enforcement of warranty claims, the legal basis for the processing is the fulfilment of a legal obligation to which the controller is subject.

In the cases referred to in points a) to d) above, the provision of the requested personal data is a condition for the use of the service or the conclusion of the contract, and you are therefore obliged to provide them when requesting a quote, ordering, purchasing or invoicing the product/service, and when claiming under warranty. Failure to provide this information may result in the Company refusing to enter into a contract or to fulfil your request or other request.

- e) The legal basis for the processing of data when you fill in and submit the contact and request for proposal form on the Company's website is your consent. By submitting the form, you consent to the Company's accessing, storing and using the data you provide in order to answer your question or prepare a quotation.
- f) When you visit the Company's website, cookies placed on your computer to enhance your user experience or used for analytical purposes are placed, stored and read with your consent.
- g) The placement, storage and reading of cookies placed by the Company's website and ensuring the correct functioning of the website is a condition of the functioning of the website, in which case the legal basis for data processing is the preparation and performance of the contract with the customer. The non-processing of the data would hinder the proper functioning of the website, and therefore the Customer visiting the website cannot prohibit the processing of data for this purpose.
- h) The legal basis for sending newsletters, marketing enquiries and advertising is your explicit consent.
- i) The legal basis for the processing of data related to the competition is your explicit consent.

Does the Company transfer your personal data?

The Company shall forward the personal data on the invoice to the accounting firm appointed by the Company (M.SZ. Számviteli Kft 9025 Győr, Kunszigeti út 2.) for accounting purposes.

If you have ordered the product from us through a reseller, the Company will also inform the reseller of the status of the order and the finished product.

The Company has ascertained in advance that the recipient of the data transfer or the entity entitled to access the data is established in the European Union and provides adequate guarantees that the processing of the data by the Company complies with the data protection laws of Hungary and the European Union.

In addition to the above, the Company may only transfer your personal data to a court or other authority in cases and in the manner provided by law, on the basis of a request, a legal obligation or a decision.

How long will the Company keep your personal data?

The Company is obliged to store your personal data collected for billing or ordering purposes for a period of time that complies with applicable accounting and tax legislation.

The Company shall retain the personal data used for contacting, ordering, contracting and invoicing, which have not been deleted after the failure of the contract, the performance of the contract or the

termination of the contract, for five years after the failure of the contract or the termination of the contract, in accordance with the general limitation rules of Act V of 2013 on the Civil Code. The purpose of the processing of data under this clause is to enable the Company to enforce its rights and claims arising from the contract, and to defend itself in the event of such legal claims.

The Company will retain the personal data processed with your consent for as long as it is necessary for the purposes for which it is processed or until you request the deletion of your personal data.

What are your rights regarding the processing of your personal data?

Information and access

You have the right of access during the processing. Therefore, you may ask the Company whether your personal data is being processed and, if so, whether it is being processed by the Company or by a processor appointed by it or on its behalf, the source of the data, the purposes of the processing and the legal basis for the processing, the name, address and activities of the data processor in relation to the processing, the circumstances of the personal data breach, its effects and the measures taken to remedy it, and, in the case of a transfer of personal data, the legal basis and recipient of the transfer. Upon your request, the Company will provide you with a copy of the data it processes.

Correction

During the processing, you may at any time request the Company to correct or supplement the personal data concerning you. If the personal data is not accurate and the accurate personal data is available to the Company, the Company will correct the personal data. The Company will notify you of the rectification, as well as any third parties to whom the data may have been previously disclosed for processing purposes.

Delete

At any time during the processing, you have the right to request that the Company delete your personal data(s) without undue delay if one of the following grounds applies:

- a) the personal data you have provided is not necessary for the purposes for which it was collected or otherwise processed by the Company,
- b) the Company processed the personal data on the basis of your consent, you have withdrawn your consent in writing and there is no other legal basis for the processing,
- c) You object to the processing based on the Company's legitimate interests and there are no compelling legitimate grounds for the Company to override your interests, rights and freedoms or to assert, exercise or defend legal claims,
- d) the Company unlawfully processed the personal data,
- e) the data processed by the Company must be deleted in order to comply with a legal obligation under Union or national law applicable to the Company,
- f) You object to the processing and there is no overriding reason for the processing.

Please note that you must make your request for erasure in writing (by post or e-mail) and indicate the reason for which you wish to erase the personal data.

If the Company grants your request for erasure, it will erase the personal data processed from all its records and will inform you accordingly.

In the event that the Company is under an obligation to delete your personal data, the Company will take all reasonable steps, including the use of technical measures, necessary to inform the data controllers who have become aware of your personal data as a result of its disclosure of the obligation to delete your personal data. The Company shall inform other data controllers in its prospectus that you have requested the deletion of links to your personal data or of copies or replicas of such personal data. The Company will inform the persons to whom your personal data have been disclosed without undue delay after complying with your request to exercise your right to erasure, provided that this is not impossible or involves a disproportionate effort on the part of the Company.

The Company is not obliged to delete personal data in cases where the processing is necessary:

- a) the exercise of the right to freedom of expression and information,
- b) to comply with an obligation imposed on the Company by Hungarian or European Union law to process personal data,
- c) for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company,
- d) to achieve a public interest in the field of public health,
- e) for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, provided that the exercise of the right to be forgotten would be likely to render the processing impossible or seriously jeopardise the data subject's right to be forgotten,
- f) to bring, enforce or defend legal claims.

Restriction

You have the right at any time to request that the Company restrict the processing and use of your personal data(s) if one of the following grounds applies:

- a) You dispute the accuracy of the personal data (in which case the restriction will last until the Company verifies the accuracy of the data),
- b) the Company has unlawfully processed the personal data, but you request restriction instead of erasure,
- c) the purpose of the processing has ceased to exist for the Company, but you require the data for the establishment, exercise or defence of legal claims,
- d) you object to processing based on the Company's legitimate interests and there are no compelling legitimate grounds for the Company to override your interests, rights and freedoms or to assert, exercise or defend legal claims, in which case the restriction shall continue until it is determined whether the Company's legitimate grounds override your legitimate grounds.

In the case of restriction, personal data, except for storage, may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the EU or of an EU Member State.

The Company will promptly inform the persons to whom your personal data has been disclosed of your request to exercise your right to restriction, provided that this is not impossible or involves a disproportionate effort on the part of the Company.

Protest

You have the right to object to the processing of your personal data and in such a case the Company may no longer process your personal data unless it can be demonstrated that.

- a) the processing is justified by compelling legitimate grounds on the part of the Company which override your interests, rights and freedoms; or
- b) the processing relates to the establishment, exercise or defence of legal claims by the Company.

Withdrawal of consent

If the processing has been carried out with your consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal.

Data portability

You may at any time request to receive personal data concerning you that the Company has provided to you in a structured, commonly used, machine-readable format and you have the right to transfer such data to another controller without the Company's hindrance.

Claims

In the event of a violation of your privacy rights, you may take legal action against the Company.

You can always ask the National Authority for Data Protection and Freedom of Information for help with data protection issues:

President: dr. Attila Péterfalvi
mailing address: 1534 Budapest, PO Box 834
address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
Phone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
www: <http://www.naih.hu>
e-mail: ugyfelszolgalat@naih.hu

For the enforcement of your rights in matters not covered by this Policy, Act CXII of 2011 on Informational Self-Determination and Freedom of Information and 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, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation, GDPR) shall apply.

The detailed Privacy Policy on the processing of personal data and the operation of the CCTV system is available at the Company's headquarters and on the Company's official website.

If you have any questions about the processing of your personal data or if you wish to exercise your data subject rights, please contact the Company's designated data protection officer, Zsolt Papp, at info@aquacrom.eu.