

Privacy Policy

This Privacy Policy (hereinafter: Policy) sets forth the principles, purposes, and other facts regarding the processing of data related to the use of certain services available on the website of PANNADAM Limited Liability Company (registered office: 1124 Budapest, Fürj utca 29. B., tax number: 27952759-1-43) at <https://easyironing.hu/>.

Definitions:

- **Data Controller:** PANNADAM Limited Liability Company (hereinafter: PANNADAM LLC) processes the data provided by the Client, meaning that only PANNADAM LLC can make and execute decisions regarding the Client's personal data.

Data Controller's Details:

- Registered office and mailing address: 1124 Budapest, Fürj utca 29. B.
- Company registration number: 01-09-2358740 (registered by the Company Registry Court of the Metropolitan Court)
- Tax number: 27952759-1-43
- Email address: office@easyironing.hu
- Phone number: +36 20 966 9666

- **Data Processing:** Any activity related to personal data, regardless of the method or means used for processing, and regardless of the location where the processing takes place, provided that the activity is performed on the data. Accordingly, a data processor is any natural or legal person, public authority, agency, or other body that processes personal data on behalf of the data controller.

- **Personal Data:** Any information relating to the Client, based on which the identification or identifiability of the Client is fulfilled. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. The Data Controller collects personal data about the Client as specified for each processing purpose in this policy.

- **Service:** Any service that can be used at the discretion of the Client through the Website.

- **Client:** Any person who uses the services of PANNADAM LLC and whose personal data is processed by the Data Controller.

- **Computer:** Any computing device under the control of the Client, such as a computer, mobile phone, tablet, which is capable of receiving cookies (data packets) as defined by Section 21 of Act C of 2003 on electronic communications.

- **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation).

- **Cookie:** A file (data set) created on the Client's Computer by the program displaying the Website, storing information about the Client, the connection between the Client and the web server. The purpose of using cookies is to identify (recognize) the Client's computer, ensure easier browsing and track it, as well as to analyze and evaluate the usage habits of visitors to the Website, and improve user experience accordingly.

- **Website:** The website of PANNADAM LLC: <https://easyironing.hu/>

- **Data Protection Authority:** National Authority for Data Protection and Freedom of Information

- Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
- Email address: ugyfelszolgalat@naih.hu
- Website: <http://naih.hu>
- Phone number: +36 (1) 391-1400

Data Controller's Contact Information

The contact details of the Data Controller are as follows:

- a) Registered office and mailing address: 1124 Budapest, Fürj utca 29. B. building.
- b) Email: office@easyironing.hu
- c) Phone number: +36 20 966 9666

Data Processing Purposes and Process

The fact of data collection, the scope of processed data, and the purposes of data processing:

Personal data	Purpose of data processing
Name	Identification, billing
Phone nr.	Contact, fulfillment of the contract
E-mail address	Contact, fulfillment of the contract
Address	Contact, fulfillment of the contract, billing
Date of contacting	Technical operation
IP adress	Technical operation

- Scope of data subjects: All individuals who are in contact with the data controller via phone, email, or in person, or who are in a contractual relationship with the data controller.
- Duration of data processing, deadline for deletion of data: Data processing lasts until the termination of the relationship between the data controller and the data subject, or for 8 years following the termination of the contract.
- Identity of possible data processors authorized to access the data, recipients of personal data: Personal data may be accessed by authorized employees and contractual partners of the data controller, while adhering to the above principles and purposes.

Explanation of data subjects' rights related to data processing:

The data subject may request from the data controller access to their personal data, correction, deletion, or restriction of processing, and has the right to data portability, as well as the right to withdraw consent at any time.

The data subject can initiate access to personal data, their deletion, modification, or restriction of processing, and data portability through the following methods:

- By mail at the address: 1124 Budapest, Fürj utca 29. B.,

- By email at the address: office@easyironing.hu,
- By phone at the number: +36 20 966 9666.

Legal basis of data processing:

- Article 6(1)(b) and (c) of the GDPR.
- Pursuant to Section 6:21 of Act V of 2013 on the Civil Code, in the case of enforcement of claims arising from contracts, the retention period is 5 years.

We hereby inform you that:

- This data processing is based on your consent and is necessary for initiating contact.
- You are obliged to provide personal data in order to be able to contact us. • Failure to provide the data will result in the consequence that you will not be able to contact the Service Provider.

Enforcement of Rights and Remedies

Communication with the Data Controller

Communication between the Client and the Data Controller can occur via telephone, email, or postal mail. The email address designated for this purpose by the Data Controller is: office@easyironing.hu; postal address: 1124 Budapest, Fürj utca 29. B. building. The Client is entitled to request feedback from the Data Controller at any time regarding whether the processing of their personal data is in progress, and if so, the Client has the right to access the processed personal data to the extent described below.

Within the scope of access, the information provided by the Data Controller regarding data processing may include, but is not limited to, the following: a) Purposes of data processing; b) Processed personal data; c) Recipients of data transfers; d) Expected duration of data processing, or if this cannot be determined, the criteria for determining the duration; e) Rights exercisable by the Client; f) Right to lodge a complaint with the Authority; g) Source and legal basis of information collected by the Data Controller.

The Data Controller is obliged to provide the requested information without undue delay, but no later than one month from the date of the information request. Upon the Client's request, the Data Controller shall provide a copy of the personal data subject to processing. The Data Controller may charge a reasonable administrative fee for any additional copies requested by the Client.

a) The Data Controller only examines and responds to emails sent by the Client regarding data processing if they are sent from the email address previously provided by the Client (unless the Client refers to a change in their email address in the message, or the Client's identity can be clearly identified from it).

b) The Data Controller shall inform the Client without delay, but no later than one month from the date of the action, of any measures taken regarding personal data and shall provide information about the reasons for any failure to take action upon the Client's request, as well as the Client's right to lodge a complaint with the Authority and to seek judicial remedy.

Correction

The Client is entitled to notify the Data Controller (via email or postal mail as specified above) of any changes in their personal data. The Data Controller shall make the necessary corrections within 8 days of receiving the request. If the Client fails to promptly report changes in their personal data, they shall bear the consequences. If the provided personal data does not correspond to reality and accurate personal data is available to the Data Controller, the Data Controller shall automatically correct the personal data.

Data Deletion

The Client has the right to request the Data Controller to promptly delete their personal data, and the Data Controller is obliged to delete the personal data concerning the Client without undue delay, especially if one of the following reasons applies:

- a) The personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- b) The Client withdraws their consent to the processing, and there is no other legal basis for the processing.
- c) The Client objects to the processing based on legitimate interests.
- d) The personal data has been unlawfully processed by the Data Controller.
- e) The personal data must be erased to comply with a legal obligation under Union or Member State law to which the Data Controller is subject.

The Data Controller is not obliged to delete the processed personal data if processing is necessary for:

- a) Exercising the right to freedom of expression and information.
- b) Compliance with a legal obligation that requires processing by Union or Member State law, or for the performance of a task carried out in the public interest.
- c) Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, where deletion is likely to render impossible or seriously impair the achievement of the objectives of such processing.
- d) The establishment, exercise, or defense of legal claims.

Objection to Data Processing

The Client has the right to object to the processing of their personal data based on legitimate interests according to this policy, at any time for reasons relating to their particular situation (based on legitimate interests according to this policy, including the newsletter service and camera surveillance data processing). In this case, the Data Controller may not further process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the Client, or for the establishment, exercise, or defense of legal claims.

Right to Restrict Processing

The Client has the right to request the Data Controller to restrict the processing of their data if one of the following conditions is met:

- a) The Client disputes the accuracy of their personal data, in which case the restriction shall apply for a period enabling the Data Controller to verify the accuracy of the personal data.
- b) The processing is unlawful, and the Client opposes the deletion of the personal data and requests the restriction of their use instead.
- c) The Data Controller no longer needs the personal data for the purposes of the processing, but the Client requires them for the establishment, exercise, or defense of legal claims.
- d) The Client has objected to the processing, in which case the restriction shall apply for the period until it is verified whether the legitimate grounds of the Data Controller override those of the Client.

If processing is restricted as described above, such personal data may, with the exception of storage, only be processed with the consent of the Client, or for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest. If the restriction on processing is lifted, the Data Controller shall inform the Client in advance of this fact.

Right to Data Portability

With the consent of the Client or for the performance of a contract, the Client has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance from the Data Controller to whom the personal data have been provided. This right is only applicable to personal data processed based on consent or for the performance of a contract.

Initiating Proceedings with the National Authority for Data Protection and Freedom of Information

The Client may initiate an investigation with the Authority by way of notification, claiming that there has been a violation of their rights regarding the processing of personal data, or there is an immediate danger thereof. The investigation by the Authority is free of charge, and the costs of the investigation are advanced and borne by the Authority. No one shall suffer any disadvantage due to the notification made to the Authority. The identity of the notifier shall only be disclosed by the Authority if without it, the investigation cannot be conducted. If the notifier requests, their identity shall not be disclosed by the Authority even if without it, the investigation cannot be conducted.

Legal Remedies before a Court

In case of infringement of rights, the Client may bring an action against the Data Controller before a court. As a general rule, the court having jurisdiction is determined by the registered office of PANNADAM Ltd., but the action may also be brought before the court having jurisdiction over the place of residence or habitual residence of the Client, as chosen by the Client. The jurisdiction of the court can be checked with the "Court Finder" application available on the website www.birosag.hu.

Compensation and Moral Damages

If the Data Controller unlawfully processes the personal data of the Client or breaches the requirements of data security:

- a) If the Client or another person suffers damage, the Data Controller is obliged to compensate for it (compensation);
- b) If the Data Controller violates the personality rights of the Client, the Client may claim moral damages from the Data Controller.

The Data Controller is exempt from liability for the damage caused and from the obligation to pay moral damages if it proves that the damage or the violation of the Client's personality rights was caused by an unavoidable external factor beyond the scope of data processing. Damage does not have to be compensated, and moral damages cannot be claimed to the extent that the damage or the violation of personality rights resulted from intentional or grossly negligent conduct by the Client (injured party).

Miscellaneous Provisions

In the case of Clients under the age of sixteen, the consent of their legal representative (parent) is required to provide personal data.

The Data Controller reserves the right to unilaterally amend the Regulations at any time.

Hungarian law shall apply to the Regulations.

The Regulations shall enter into force on March 1st, 2024.

Budapest, March 1st, 2024.