

## **INFORMATION ABOUT DATA PROTECTION AND PRIVACY POLICY**

in which we inform you, as a visitor to our website and webshop, as well as the user of our services, about our company's data management and data protection rules.

### **1. What are the principles behind our data management?**

Our Company follows the below principles in its data management:

- a) your personal data is treated legally and fairly and is treated transparently for you.
- b) personal data is collected only for specific, unambiguous and legitimate purposes and are not treated in a manner that is incompatible with these purposes.
- c) personal data collected and managed by us are appropriate and relevant to the purposes of data management and are limited to what is necessary.
- d) our Company takes all reasonable measures to ensure that the information we manage is accurate and, if necessary, up-to-date; inaccurate personal data is deleted or corrected immediately.
- e) personal data is stored in a format that you can only be identified for the time period necessary for the purposes of personal data collection.
- f) we provide adequate technical and organizational measures to ensure the security of personal data against unauthorized or unlawful handling, accidental loss, destruction or damage to data.

### **With reference to your data, our Company**

- a) treats the data on the basis of your prior, informed and voluntary consent and only to the extent necessary and in a manner always limited to an objective – that is: data is collected, observed, systematized, stored and used this way.
- b) in some cases, management of your data is based on law and mandatory; in such cases we will specifically call your attention to this fact.
- c) in some cases, our Company or a third party has a legitimate interest in managing your personal data, such as related to the operation, development and security of our website and webstore.

### **2. Who are we?**

**K&R Trading Co. Ltd.**

Our Company's legal seat: H-1195 Budapest, Hofherr Albert utca 3/a, HUNGARY

Our Company's premises: H-1195 Budapest, Hofherr Albert utca 3/a, HUNGARY

Our Company's websites: [www.wraptrade.com](http://www.wraptrade.com); [www.nyomdashop.hu](http://www.nyomdashop.hu); [www.autofolia.eu](http://www.autofolia.eu); [www.skyfolablakfolia.hu](http://www.skyfolablakfolia.hu); [www.karosszeriaautofoliazas.hu](http://www.karosszeriaautofoliazas.hu); [www.kpluszr.hu](http://www.kpluszr.hu); [www.skyfol.hu](http://www.skyfol.hu); [www.skyfol.com](http://www.skyfol.com); [www.autofoliazas-arak.hu](http://www.autofoliazas-arak.hu); [www.budapest-autofoliazas.hu](http://www.budapest-autofoliazas.hu); [www.skyfol-autofoliazas.hu](http://www.skyfol-autofoliazas.hu); [www.skyfol-autofolia.hu](http://www.skyfol-autofolia.hu)

Contact person: Peter Veres, general manager

Phone number: +36 1 410 7611

Email address: info@kpluszr.hu

VAT number: 10512478-2-43

EU VAT number: HU10512478

The name of our Company's hosting provider: Versanus Kft.

In managing data, our Company uses the following data processors, in order to provide high quality service to our customers:

NAME	ADDRESS	ACTIVITY
Vision Software Számítástechnikai Kereskedelmi és Szolgáltató Kft.	1149 Budapest, Pósa Lajos utca 51. HUNGARY	<i>IT service provider</i>
VS Fejlesztési Stúdió Kft.	1149 Budapest, Pósa Lajos utca 51. HUNGARY	<i>IT service provider</i>
Visionsoft Üzleti Megoldások Kft.	1149 Budapest, Pósa Lajos utca 51. HUNGARY	<i>IT service provider</i>
Versanus Kft.	1034 Budapest, Verhovina utca 8. HUNGARY	<i>hosting provider</i>
GLS	2351 Alsónémedi, GLS Európa utca 2. HUNGARY	<i>courier service</i>
DPD	1158 Budapest, Késmárk utca 14 B. ép. HUNGARY	<i>courier service</i>
UPS	2220 Vecsés, Lőrinci út 154. Airport City Logistic Park g. ép. HUNGARY	<i>courier service</i>
Fedex	2200 Vecsés, Lőrinci út 59. HUNGARY	<i>courier service</i>
TNT	1185 Budapest, II. Logosztikai központ – Irodaépület, BUD Nemzetközi Repülőtér 283.	<i>courier service</i>

In case we change the scope of our data processors, the changes will be transmitted in our present document.

**Data managed by our Company:**

<b>Name of activity and the objective of data management</b>	<b>Legal basis</b>	<b>Data managed</b>	<b>Time period</b>
<p><b>Register on the website</b></p> <p>Objective: to provide our users with a fuller user experience</p> <p>to give notice of a break of services, change of contact details of our Company, etc.</p>	consent	<p>surname, first name</p> <p>email address</p>	<p>until the registration is canceled, and until the consent is withdrawn</p>
<p><b>Using Webstore services</b></p> <p>Objective: to register and record details of visitors,</p> <p>to handle and perform orders, purchases, billing and delivery management,</p> <p>to handle complaints and recalls,</p> <p>to analyse the habits of our customers,</p>	<p>consent</p> <p>contract</p> <p>legal regulation (GDPR Art.6 Sect. 1) c)</p> <p>Eker tv. 13/A §,</p> <p>Számv. tv. 169. §).</p>	<p>full name,</p> <p>phone number and email address,</p> <p>details of your purchases (product, quantity, price, date&amp;time),</p> <p>data related to payment (due date, bank account number, debit or credit card number, e-wallet, c.o.d., etc.),</p> <p>participation in one-time or permanent</p>	<p>for an indefinite period of webstore functioning, but not later than the revocation of the consent to data management</p> <p>The retention period for data related to the performance of contracts is</p>

<p>to contact our customers.</p>		<p>discounts,  details of delivery: delivery deadline and address (ZIP code, city, street address, floor, apt)  billing name, full name for private persons,  your VAT number (in case it is necessary to create invoices)  billing address (ZIP code, city, street address, floor, apt).</p>	<p>5 years.  The invoices issued and the documents on the basis of which the invoices were issued have a conservation period of 8 years.</p>
<p><b>Newsletter service</b>  Objective: to keep in contact,  to inform you of new products and discounts</p>	<p>consent</p>	<p>full name,  email address</p>	<p>until you unsubscribe from the newsletter</p>
<p><b>Customer service, complaints</b>  Objective: to respond to information requests and claims</p>	<p>legal requirement</p>	<p>full name  email address  phone number  mailing address  other personal message</p>	<p>5 years</p>

We only ask our visitors for their personal information when they intend to register, log in or shop at our webshop.

We shall not link personal data provided upon registration or use of the webshop services and we do not fundamentally aim to identify our visitors.

With requests about the management of data you can contact us by e-mail at [info@wraptrade.com](mailto:info@wraptrade.com) and [info@kpluszr.hu](mailto:info@kpluszr.hu). We will send you further information without delay, within 3 business days at the contact details you provided.

### 3. What are cookies and how do we manage them?

Cookies are small data files that are sent to your computer via the website and through the use of the website, so that they are saved and stored by your web browser. Most of the most frequently used web browsers (Chrome, Firefox, etc.) accept and allow the download and use of cookies by default, however, it is up to you to modify your browser settings to reject or disable them, or you can also delete already stored cookies, too. For more information on using cookies, see the "Help" section of each browser.

There are cookies that do not require your prior consent. Our website provides brief information about these cookies upon your first visit. Examples are cookies for authentication, multimedia player, load balancing, user interface customizing, and user-centered security cookies.

About the cookies requesting consent, if your data management is started already by visiting the site, our Company will inform you and you will be asked to give your consent at the start of the first visit.

Our company does not use or authorize cookies that allow third parties to collect data without your consent.

Acceptance of cookies is not mandatory, but our Company accepts no liability if, in the absence of enabling cookies, our website may not function as expected.

#### What cookies do we use?

Type	Name	Consent	Description	Objective	Validity
<i>system cookies</i>		<i>not required</i>	<i>session cookie on the web application firewall to prevent misuse of cross links</i>	<i>to provide the functioning of the website</i>	<i>end of browser session</i>
<i>tracking cookies (originating from third parties)</i>		<i>not required</i>	<i>for the identification of new sessions and visitors, Google Analytics saves a web tracking</i>	<i>related to third party (e.g. Google) services while visiting the website</i>	<i>15 minutes</i>

			<i>application</i>		
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About third party cookies, you can find more information at <https://www.google.com/policies/technologies/types/>, and about data protection at <https://www.google.com/analytics/learn/privacy.html?hl=en-GB>

#### **4. What do you need to know about our webstore's data management?**

You voluntarily provide us with your personal information when registering, purchasing or contacting our Company. Therefore, we ask you to keep in mind the accuracy and correctness of your information when communicating it, because you are responsible for these details. Incorrect, inaccurate or incomplete data may be an obstacle to using our services.

If you do not provide personal information of your own but of another person, we assume that you have the authority to do so.

You may revoke your consent for data management at any time

- by deleting the registration,
- by withdrawal of your consent to data handling, or
- by a request to withdraw or block the management or usage of any data entered at registration.

We acknowledge the registration of the withdrawal of consent - for technical reasons - with a deadline of 3 working days, however, please note that we may still manage some of the data to fulfil our legal obligation or to enforce legitimate interests after the withdrawal of the consent (e.g. Számv tv. 169. § , Fogyv tv. 17/A §)

In the event of fraudulent use of personal data or when a visitor commits a criminal offense or attacks our Company's system, simultaneously with the deletion of that visitor's registration, their data will be deleted immediately or, if necessary, retained for the time period and purpose of establishing civil liability or prosecuting.

#### **5. What do you need to know about our data management related to direct marketing and newsletters?**

You may make a declaration of your consent of using your personal data for marketing purposes when registering or by modifying your personal information stored in the webshop at a later time (that is by making an explicit consent). In this case, until your consent is withdrawn, your data will also be managed for direct marketing and / or newsletter purposes and you will be sent advertising and other items, as well as information and offers and / or newsletters (Grtv. 6. §).

**You may grant your consent for direct marketing and newsletter either collectively or separately and / or withdraw them free of charge and at any time.**

Cancellation of the registration is always considered as withdrawal of consent. Withdrawal of consent for direct marketing and / or newsletter management is not interpreted as withdrawing a data management contribution related to our webstore.

The registration of the withdrawal or cancellation of individual contributions is registered, for technical reasons, with a deadline of 3 working days.

## **6. Other questions of data management**

Your data may only be transmitted under legal terms, and we may be provided to our data processors under contractual terms, so that your personal information may not be used for purposes contrary to your consent. See Section 2 for more information.

Our company may transmit data abroad only based on the relevant regulations of GDPR and Infotv.

The court, the prosecutor's office and other authorities (e.g. police, tax office, National Privacy and Data Protection Authority) may contact our Company for information, disclosure of data or documents. In these cases, we must fulfil our reporting obligation, but only to the extent necessary to achieve the purpose of the request.

Contributors and employees participating in the data management of our company are entitled to get to know your personal information, with a confidentiality obligation, to a predetermined extent.

We protect your personal information with appropriate technical and other measures, and ensure the security and availability of data, as well as protect it from unauthorized access, alteration, damage, disclosure and any other unauthorized use.

Through organizational measures, we check physical access to our buildings, keep our employees trained continuously and keep paper-based documents protected with adequate measures. We use encryption, password protection and anti-virus software within the range of technical measures. However, your attention is drawn to the fact that data transmission over the Internet cannot be considered be a fully secure data transfer. Our company does its utmost to make the processes as safe as possible, but we cannot take full responsibility for the transfer of data via our website; nevertheless, we comply with strict measures in order to protect the security of your data that arrives to our Company to and prevent unauthorized access.

For security issues, please help us with keeping your existing password on our website and / or our webstore in safety and with sharing this password with no one.

## **7. What are your rights and legal remedies?**

About data management, you may

- ask for information,
- request the rectification, amendment, supplementation of personal data managed by us,

- object to data handling and may request the deletion or blocking of your data (excluding mandatory data handling),
- have legal remedies before the courts,
- file a complaint with the supervisory authority or initiate a procedure (<https://naih.hu/panaszuegyintezes-rendje.html>).

**Supervisory Authority: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority of Data Protection and Freedom of Information)**

- Legal seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/c. HUNGARY
- Mailing address: 1530 Budapest, Pf.: 5. HUNGARY
- Phone: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Website: <https://naih.hu/>

**At your request**, we will provide you with information about the below, managed by us or by a data processor commissioned by us:

- data,
- their source,
- the purpose and legal basis of data management,
- its duration or, if this is not possible, the factors of the determination of this period,
- about the name, address and data management activities of our data processors,
- the circumstances, effects of data protection incidents and the actions to overcome and prevent them, and
- in case of the transfer of your personal data: about the legal basis and the addressee of the transfer.

We will provide information at the earliest possibility after your request, within 3 working days. Information is provided free of charge unless you have already submitted an information request for the same data group in the current year. We will refund amounts that you have already paid in the event that your data was unlawfully handled or your request for information has resulted in a correction. The information can only be denied in legal cases by indicating the legal reference and by providing information on the judicial remedy or the opportunity to appeal to the Authority.

Our Company will notify you of any personal data correction, blocking, marking or deletion and will notify anyone who were previously forwarded the data for data processing, unless the failure to notify does not violate your legitimate interest.

If we fail to comply with your request for rectification, blocking or cancellation of data, we will send you, in writing or with your consent, electronically, within 14 days (or within a maximum of 1 month of receipt of your request), the reasons for the rejection and inform you of judicial remedies, the possibility of appeal to the Authority.

If you object to the handling of your personal information, the protest will be examined as soon as possible, within 14 days (but not more than within 1 month) from the submission of the application and we will inform you in writing about our decision. If we have decided that your objection is well-founded, data management, including further data collection and transfer, will be discontinued and the data will be blocked, and we will notify about the



actions taken all those who were previously passed personal data affected by the objection and its follow-up actions, and who are required to take action in order to enforce the right to protest.

We will refuse to comply with this request if we prove that data processing is justified by legitimate reasons of enforceability that prevail over your interests, rights, and freedoms or which relate to the submission, validation or protection of legal claims. If you do not agree with our decision, or if we fail to comply with the deadline, you may contact court within 30 days of the date of the communication of the decision or of the last day of the deadline.

The processing of data protection laws falls within the jurisdiction of the court, and the proceedings may be initiated (upon the concerned party's decision) also before the court of domicile or residence of the person concerned. Foreign nationals may also apply to a supervisory authority competent for their place of residence.

**Please do not hesitate to contact our Company before contacting the supervisory authority or court with your complaint - in order to resolve the issue and solve the problem as quickly as possible.**

## **8. What are the main guiding legal regulations related to our activities?**

- 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 (GDPR)
- Act CXII of 2011 on Informational Self-determination and Freedom of Information - (Info tv.)
- Act V of 2013 on the Civil Code (Ptk.)
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services - (Eker tv.)
- Act C of 2003 on Electronic Communications - (Ehtv)
- Act CLV of 1997 on Consumer Protection (Fogyv tv.)
- Act CLXV of 2013 on Complaints and Public Interest Disclosures (Pktv.)
- Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising (Grtv.)
- Act C of 2000 on Accounting (Számv tv.)

## **9. Modification of the data protection information and privacy policy**

Our Company reserves the right to modify this Privacy Policy, about which we will inform concerned parties appropriately. Data management information is published on all the websites we manage.

Budapest, 2018.05.24.