

# **PRIVACY POLICY**

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## 1. Introduction, Data Controller's data, contact details

REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals 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)

the following information is provided.

THE CONTROLLER AND ITS CONTACT DETAILS:

The data is processed by **Oxygeni Hair Kft.**

Registered office and mailing address: 2040 Budaörs, Kecskékó utca 8.

Company registration 13-09-201241

number:

Tax number: 27038905-2-13

E-mail: [info@oxygenihair.com](mailto:info@oxygenihair.com)

Telephone: 06703660277

The Data Controller shall endeavor to comply as closely as possible with the recommendations of the National Authority for Data Protection and Freedom of Information, in particular its Recommendation of 29 September 2015 on the data protection requirements of prior information, and shall therefore explain the data protection rules as clearly as possible, if necessary explaining them with examples, and shall describe in detail the individual processing activities, so that the data subject can decide whether or not to give his or her voluntary consent.

If you wish to contact our Company, you may contact our Company as the data controller using the contact details provided in this notice or on the Website.

The Company will delete all e-mails received - together with the sender's name, e-mail address, date, time and other personal data provided in the message - after five years from the date of the communication.

We inform the Data Subjects that the court, the prosecutor, the investigating authority, the law enforcement authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, or other bodies authorised by law may contact the controller to provide information, to disclose or transfer data, or to provide documents.

The Company will disclose to the authorities, if the authorities have indicated the precise purpose and scope of the data, only such personal data as is strictly necessary for the purpose of the request and to the extent strictly necessary for the purpose of the request.

## 2. Scope of the Rules

(applies to data provided online and/or in-store, right to change)

### 2.1. Temporal scope

These Rules shall be in force from 1 October 2021 until further notice or until revoked.

### 2.2. Personal scope

These Rules apply to the following persons:

- the Data Controller, and
- persons whose data are included in the processing covered by this Policy, and
- persons whose rights or legitimate interests are affected by the processing.

-The Data Controller therefore primarily processes the data of natural persons who, through any means or means available to them, such as by electronic means, by sending their data to any of the Data Controller's e-mail addresses, through a social networking site or by telephone or in person,.

- have applied to establish a relationship,
- have used or requested the services of the Data Controller; or
- for reasons or purposes other than establishing a relationship;

-the Staff of the Data Controller;

-the Data Controller natural person's Partners, not natural person's Partners' representatives, contacts, or other employees

### 2.3. Material scope

This Policy applies to all processing of personal data carried out in all departments of the Data Controller, regardless of whether it is carried out electronically and/or on paper. In the case of paper-based processing, the Data Controller shall also establish and operate an archiving policy formally separate from this Policy, which shall complement the general provisions under this Policy and shall be covered by this Policy and therefore be considered as an annex to this Policy.

### 2.4. Data provided online/in-store

This Notice covers the processing of personal data provided to the Company's online portal (Website) at <https://oxygenihair.com> and <https://shop.oxygenihair.com> and to the Company's headquarters/regional centres/other institutions in connection with the use of services.

### 2.5. Amendments to the Privacy Policy

The Company reserves the right to change this information at any time and will notify any changes in due time. Amendments shall take effect for the Data Subject on the date specified in the notice and the amendment, unless the Data Subject objects to the amendments. If Data Subjects have a question that is not clear from this notice, please write to us and our colleague will answer your question.

The Company is committed to maintaining the highest level of service quality, but does not accept any liability for any damage resulting from the use of the system.

### 3. Relevant legislation

The Association's data management principles are in line with the applicable data protection legislation, in particular:

Act CLV of 1997 - on Consumer Protection (Fgytv.)  
Act XIX of 1998 on Criminal Procedure (Be  
Act C of 2000 - on Accounting (Accounting Act  
Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (Eker. tv  
Act C of 2003 - on electronic communications (Eht  
Act CXXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigation (Act on the Protection of Private Investigators)  
Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Economic Advertising (Act XLVIII of 2008  
Act XLVII of 2008 on the prohibition of unfair commercial practices against consumers  
Act . 2011 - on right to self-determination  
information and on freedom of information (Infotv.)  
Act CLIX of 2012 on Postal Services (Postal Services Act)  
Act V of 2013 on the Civil Code (Civil Code)  
Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

### 4. Definition of term

**4.1. Data Controller or Company:** Oxygeni Hair Kft.

**4.2. Data Subject:** a natural person identified or identifiable on the basis of any information; for the purposes of this Policy, the Partner and other data subjects collectively;

**4.3. Data subject's consent:** a voluntary, specific, informed and unambiguous indication of the data subject's wishes, by which the data subject signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or an unambiguous act of affirmation;

**4.4 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, 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;

**4.5. Processing:** any operation or set of operations which is performed upon 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;

**4.6 Data Controller:** the natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines and implements the purposes and means of the processing of personal data (including the means used) or has a processor appointed by it to implement them;

**4.7 Processor:** a natural or legal person, public authority, agency or any other body that processes personal data on behalf of the controller;

**4.8. data file:** the set of data processed in a register;

**4.9 Recipient:** the natural or legal person, public authority, agency or any other body to whom or with whom personal data are disclosed, whether or not a third party. Public authorities that may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

**4.10. Third party:** a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**4.11. Data Breach:** a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed; and accidental destruction or damage;

**4.12. Partner:** legal entities, unincorporated business entities, to which the Data Controller transfers or may transfer personal data, following the consent of the data subject, or which perform or may perform activities for the Data Controller in relation to data storage, processing, related IT and other activities facilitating secure data management, which are contracted to use the services of the Data Controller and/or facilitate the performance of the services of the Data Controller (performance facilitator);

**4.13. Employee:** a natural person who has a contract, employment or other legal relationship with the Data Controller, who is entrusted with the performance of the Data Controller's services and who, in the course of his/her data processing or data processing tasks, comes or may come into contact with personal data and in relation to whose activities the Data Controller assumes full responsibility towards the data subjects and third parties;

**4.14. Website:** <https://oxygenihair.com> and <https://shop.oxygenihair.com> and all sub-sites operated by the Data Controller;

**4.15. Community page:** a page on the portal related to the website and its content, which is maintained by the Data Controller.

## 5. Data processing related to the operation of the Company

### 5.1. Customer correspondence, contacts

Personal data	Purpose of data processing	Time of data processing	Legal basis for data processing
Name	If the Data Subject has any questions, he or she may contact the Data Controller through the contact details provided in	The Data Controller shall process the data received by it process e-mails and postal letters together with the	<b>The Data Subject's voluntary consent pursuant to Article 6(1)(a) of the Regulation.</b>
E-mail address			
Phone number			

	<p>this Notice and on the Website.</p> <p>It serves the purpose of maintaining contact between the Data Controller and the Data Subject in relation to the issue raised.</p>	<p>sender's name, e-mail address and other personal data provided in the message, from the moment of disclosure until the Data Subject's query or comment has been resolved, reply to</p>	
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**Data source:** recorded directly from the Data Subject.

**Possible consequences of non-delivery of data:** failure to contact you via customer correspondence.

## 5.2. Ordering on the Website (data processed for the purpose of concluding a contract)

Personal data	Purpose of data processing	Time of data processing	Legal basis for processing
<b>Full name</b>	<p>Processing of the data provided purpose</p> <ul style="list-style-type: none"> <li>- the conclusion and performance of a contract between distance buyers,</li> <li>- the inclusion and identification of the Data Subject in the database,</li> <li>- communication.</li> </ul> <p>Providing the data is a condition for the conclusion of the contract, and is essential for the fulfilment of the order (online contract).</p>	<p>The Data Subject's data for the performance of the contract after the expiry of the limitation period under civil law (5 years).</p>	<p><b>Article 6 (1) of the Regulation performance of the contract concluded with the Data Subject as a customer pursuant to paragraph 1(b).</b></p>
<b>E-mail address</b>	<p>The Data Controller will send a confirmation email to the email address you have provided, which is essential for the fulfilment of the order (online contract). Furthermore, the purpose of the processing:</p> <ul style="list-style-type: none"> <li>- send system message(s) related to the service (e.g. delivery time).</li> <li>- communication.</li> </ul>		
<b>Phone number</b>	<p>The order related</p>		

	maintaining contact (e.g. coordinating with a courier)		
<b>Delivery information: postal code, city, street, house number, floor if necessary, door</b>	The delivery information is necessary for the Data Controller to be able to deliver the order to your home or parcel delivery point. The provision of the data is a condition for the conclusion of the contract, essential to fulfill the order (online contract).		
<b>Billing information: postcode, town, street, house number, if necessary floor, door</b>	Required to issue an invoice. The data must be provided in order to contract, is essential to fulfill the order (online contract).	Data on the account for 8 years must be retained by the Data Controller (for more information, see section 5.3).	<b>Article 6 (1) of the Regulation a legal obligation under paragraph 1(c) fulfilment.</b>

**Data source:** recorded directly from the Data Subject.

**Possible consequences of not providing the data:** the Data Subject cannot place an order, as it is impossible to fulfill the order without providing personal data. The data controller will not have the necessary data to fulfill the order (e.g. delivery).

### 5.3. Issue of invoice

<b>Personal data</b>	<b>Purpose of data processing</b>	<b>Duration of data processing</b>	<b>Legal basis for data processing</b>
<b>Company name</b>	Mandatory content of an invoice, the purpose of which is to manage accounts, prepare and keep records.	Data on the account for 8 years must be kept by the Data Controller.	<b>Article 6 (1) of the Regulation legal persons within the meaning of paragraph 1(c) fulfil the</b>
<b>Billing address (Country, postcode,</b>	Mandatory content of the invoice.		



<b>city, address, door/floor)</b>			<b>obligation to.</b>
<b>Tax number (not required data to be provided)</b>	During which, as a tax payment the obligor of the product sales, provision of services.		
<b>Full name</b>	<p>Purpose of processing the data provided:</p> <ul style="list-style-type: none"> <li>- the conclusion and performance of a contract between distance buyers,</li> <li>- the inclusion and identification of the Data Subject in the database,</li> <li>- communication.</li> </ul> <p>Providing the data is a condition for the conclusion of the contract, and is essential for the fulfilment of the order (online contract).</p>	The Data Subject's data for the performance of the contract after the expiry of the limitation period under civil law (5 years).	<b>Article 6 (1) of the Regulation performance of the contract concluded with the Data Subject as a customer pursuant to paragraph 1(b).</b>
<b>E-mail address</b>	<p>The Data Controller will send a confirmation email to the email address you have provided, which is essential for the fulfilment of the order (online contract).</p> <p>Furthermore, the purpose of the processing:</p> <ul style="list-style-type: none"> <li>- send system message(s) related to the service (e.g. delivery time).</li> <li>- communication.</li> </ul>	The Data Subject's data for the performance of the contract after the expiry of the limitation period under civil law (5 years).	<b>Article 6 (1) of the Regulation performance of the contract concluded with the Data Subject as a customer pursuant to paragraph 1(b).</b>
<b>Phone number</b>	The order related maintaining contact (e.g. coordinating with a courier)		

**Data source:** recorded directly from the Data Subject.

**Possible consequences of non-disclosure:** The Data Controller cannot fulfil its legal obligations under the provisions of the Act on Accounting and the VAT Act.

#### 5.4. Complaints handling

<b>Personal data</b>	<b>Purpose of data processing</b>	<b>Time of data processing</b>	<b>Legal basis for processing</b>
<b>Name</b>	If the Data Subject has the right to	Under the Consumer Protection Act	<b>Article 6 (1) of the Regulation</b>
<b>E-mail address</b>			

<b>(optional)</b>	<p>the Data Controller intends to enforce a claim arising from the provision of a product or service, or handles other types of complaints from the Data Subject, the Data Controller also processes personal data in the course of the administration. The purpose of the processing is to deal with the complaint in accordance with the law and to maintain contact between the Data Controller and the Data Subject in relation to the issue raised</p> <p>In context.</p>	<p>data and the corresponding complaint letters shall be kept by the Data Controller for 5 years after the complaint has been dealt with.</p>	<p><b>the legal obligations provided for in the Consumer Protection Act and the Civil Code under paragraph 1(c) fulfilment.</b></p>
<b>Telephone number (optional)</b>			
<b>By the Data Subject complaint lodged</b>	<p>Filing a complaint, keeping it in the for the period laid down by the legislation in force</p>		

**Data source:** recorded directly from the Data Subject.

**Possible consequences of non-disclosure:** failure to address warranty and other legal claims and complaints, given that without the provision of personal data, the Data Controller is unable to contact the Data Subject in relation to the matter in question, to maintain contact and to remedy the problem.

## 5.5. Newsletter, DM activities

Pursuant to Article 6 a of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activity, the Data Subject may expressly consent in advance to being contacted by the Company with advertising offers and other mailings at the contact details provided during the subscription.

In addition, the Data Subject may, subject to the provisions of this Notice, consent to the processing of personal data by the Data Controller necessary for the sending of advertising offers.

The Data Controller will not send unsolicited commercial communications and the Data Subject may unsubscribe from receiving offers without restriction and without giving any reason, free of charge. In this case, the Data Controller shall delete all personal data necessary for sending the advertising messages from its records and shall not contact the Data Subject with further advertising offers. The Data Subject may unsubscribe from the newsletter at any time, without restriction and without giving any reason, free of charge, in the following ways.

You can request the withdrawal of your consent to receive direct marketing messages and the deletion or modification of your personal data by contacting:

- by clicking on the link in the newsletter
- by e-mail at [info@oxygenihair.com](mailto:info@oxygenihair.com), and
- by sending written request by post to 2040 Budaörs, Kecskékő utca 8.

Personal data	Purpose of data processing	Time of data processing	Legal basis for data processing
<p><b>Full name (first name, surname)</b></p> <p><b>E-mail address</b></p>	<p>Recording and identification of the Data Subject subscribing to the newsletter database. In the case of subscription, the Data Controller will send direct marketing content sends an electronic newsletter to the Data Subject.</p> <p>In the case of subscription, the Data Controller will use the email address and full name provided by the Data Subject as personal data in the course of the application, unless otherwise stated, objected or objected to, in order to send information material, promotions, offers, information about its services.</p> <p>send us an email.</p>	<p>The Data Controller shall process these data until the Data Subject unsubscribes from the newsletter in the manner specified above. In the event of unsubscription, the Data Controller will not contact the data subject with further newsletters or offers.</p> <p>Affected.</p>	<p><b>Article 6 a) of the Regulation (having regard to Article 32 of the Regulation), and the economic 2008 on the basic conditions and certain limitations of advertising activities Act XLVIII No 6.</b></p> <p><b>§ (1) of the Voluntary consent of the data subject.</b></p>

**Data source:** recorded directly from the Data Subject.

**Possible consequences of non-disclosure of data:** the Data Subject does not receive a newsletter with direct marketing content, or does not have access to or is not notified of the information, offers, coupons or promotions contained therein.

### 5.6. Data processed by partners and their contacts for the purposes of contracting

Personal data	Purpose of data processing	Time of data processing	Legal basis for data processing
<b>Contact name, email Title, telephone number</b>	<p>Where the legal person acts through a representative (contact person who is an employee or agent of the legal person), the management and recording of the contact person's data necessary for the performance of the contract.</p>	<p>The Data Controller processes the contact data until the contact objects. If any contact person or the legal entity represented by him or her so requests, the Partner or the contact person shall be entitled, even in the event of the contact person's objection, to request the Data Controller to exercise its legitimate interests or to fulfill a legal obligation in accordance with the provisions of the Civil Code of the Republic of Cyprus. Exception to this rule: where the interests or fundamental rights and freedoms of the data subject override these interests and require the protection of personal data, in particular where the data subject is a child or a minor, or where the data subject is a minor or a minor with a legitimate interest in the protection of personal data.</p>	<p><b>The Regulation legitimate interest within the meaning of Article 6(1)(f)</b></p>
<b>Company name (employer) and address, tax number, company registration number</b>	<p>a. Contract conclusion, b. Contract performance, c. Contract amendment, addendum d. Identification</p>	<p>They will be kept until the end of the contractual relationship or until the end of the period (5 years) during which the claims arising from it may be enforced (exception to this rule: if the interests or fundamental rights and freedoms of the data subject</p>	<p><b>The Regulation Article 6(1)(b):</b></p> <p><b>Treaty fulfilling</b></p>
<b>E-mail address</b>			
<b>Phone number</b>			
<b>Individual Entrepreneurship</b>			

<b>registration number,</b>  <b>location</b> <b>tax number</b>		override these interests and require the protection of personal data, in particular if the Data Subject is a child).
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**Data source:** recorded directly from the Data Subject.

**Possible consequences of failure to provide data:** the Partner is unable to make a purchase on the Website, the Data Controller is unable to conclude a cooperation contract or, in the case of a concluded contract, the lack of contact makes it difficult or impossible to fulfil the contract.

#### 5.7. Data processed to enforce claims arising from the contract

<b>Personal data</b>	<b>Purpose of data processing</b>	<b>Time of data processing</b>	<b>Legal basis for data processing</b>
<b>Name of contracting party</b>	It is necessary for the purpose of pursuing legal claims arising after the termination of the contract or to investigate and, if necessary, fulfill the claims of the Partners arising from the contract.	The Data Controller shall keep the data until the end of the period (5 years) for the enforcement of claims arising from the contract. If any contact person or legal entity represented by him or her objects to the processing, the Data Controller is entitled to keep the data for a further period of 5 years from the termination of the contract in order to pursue his or her legitimate interests or to comply with a legal obligation, even if he or she objects (exception to this rule: if the interests or fundamental rights and freedoms of the data subject override these interests and require the protection of personal data, in particular if the data subject is a child.)	<b>Article 6 of the Regulation (1) (f) of the following provisions</b> <b>The processing is carried out in the legitimate interest of the controller.</b>

**Data source:** recorded directly from the Data Subject.

**Possible consequences of not providing the data:** the Data Controller is prevented from enforcing its claims under the contract.

## 5.8. Processing of data of Data Subjects undergoing oxygen therapy treatment

Personal data	Purpose of data processing	Time of data processing	Legal basis for processing
<b>Name, e-mail address, telephone number</b>	Diagnosis page, consent form and disclaimer filling in and keeping a declaration; assessing the condition of hair or skin, evaluating a satisfaction questionnaire for statistical purposes.	During oxygen therapy treatment and during the after the end of the oxygen therapy treatment until the end of the period (5 years) during which the claims arising from the service relationship may be asserted (exception to this rule: if the interests or fundamental rights and freedoms of the data subject override these interests and require the protection of personal data, in particular if the Data Subject is a child).	<b>The Regulation Article 6(1) (b): Treaty fulfilling</b>

**Data source:** recorded directly from the Data Subject.

**Possible consequences of non-disclosure:** The Data Subject may not participate in the oxygen therapy treatment.

## 6. Data processors, data transfers

Name and contact details of the data processor	Activity	Information about data processing
Oxygeni Hair Ltd.	Providing and delivering orders and services. Providing customer service support.	Data relating to orders, data relating to the use of services, data relating to the connection of a partner.
Express One Hungary Kft.	Courier service to deliver your order	Delivery of the order to the customer's home. Data processed: name, e-mail address, telephone number, delivery address.
A General Logistics Systems B.V.	Courier service to deliver your order	Data processed: name, e-mail address, telephone number, delivery address.
Stripe, Inc.	Online payment service provider	Data processed: name,

		e-mail address. The purpose of data processing is to process transactions, confirm transactions and protect users fraud-monitoring (fraud control).
RackForest Ltd.	Storage space service	The purpose of data processing is to make the website available and to ensure its proper operation.
Lion Stack Ltd.	Website development, hosting services	The purpose of data processing is to make the website available and to ensure its proper operation.
MS Reklám Ltd.	Accounting	Scope of data processed: data on the account.
Partners - the oxygen therapy Members of the Network - reference salons, hairdressers, hairdressers Partner list available at: <a href="https://oxygenihair.com/salons/">https://oxygenihair.com/salons/</a>	Cooperative providing oxygen therapy treatment Personal data collected by partners, which relate only to the personal data of guests receiving oxygen therapy treatment.	Data processed: name, email address, telephone number, company name, company information, address.
The Rocket Science Group LLC (Mailchimp)	The Data Controller uses the services of MailChimp to send newsletters. The operator of this service is The Rocket Science Group LLC (512 Means St Suite 404 Atlanta, GA 30318 USA) to whom the e-mail addresses of the subscribers to the newsletter are forwarded. The e-mail addresses are stored by MailChimp at <a href="http://www.mailchimp.com">www.mailchimp.com</a> until consent to data processing is withdrawn. MailChimp's privacy policy is available at <a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a> .	Data processed: name, email address, telephone number, company name, company information, address.

## 7. Cookies

## 7.1. What is a cookie?

Cookies are small text files in which websites store information about your visits for a specified period of time and for a specified purpose. During repeated visits, the website is able to recognise the text file, thereby identifying the previous visitor.

The primary function of cookies is to make browsing more convenient and personalised, as they help us to store various personal data and settings. Cookies can also be used for well-targeted, personalised advertising campaigns.

..... website with regard to the provisions of Article 155, paragraph 4 of Act C of 2003, which stipulates that

*"Data may be stored or accessed on a subscriber's or user's electronic communications terminal equipment only on the basis of the clear and full consent of the user or subscriber concerned, including the purposes for which the data are processed"* provides the following information on the analytical tools, i.e. cookies, it uses.

The Company has created its website using the portal, which is the engine used by the website. The Portal and the pages created through the Portal may use the cookies set out below, but the Data Controller does not use these cookies in any way on its own. The cookies used may communicate between the Data Subject's device and the portal, they do not transmit or transfer any data to the Data Controller, and the portal's own privacy policy applies to the cookies used.

## 7.2. Types of cookies

The cookies used on the Company's website fall into 4 different categories, according to the classification of the International Chamber of Commerce: strictly necessary for operation, performance-enhancing, storing personal preferences, web analytics and advertising targeting.

### 7.2.1. Essential for operation

This type of cookie allows you to browse the website. Without these cookies, it will be impossible to serve the content (including the use of secure protocols) visited on the Company's website.

The Company's website uses a cookie containing an encrypted string to identify you when you use the Website. Each time you access the Contact Us interface, a cookie containing this unique identifier is placed on your computer. For example: session cookie These cookies are strictly necessary for the functioning of the Website and cannot be disabled. Please stop using the Company's website if you do not want these cookies to be downloaded to your browser.

### 7.2.2. Performance enhancer

These cookies collect information about how visitors use a website. For example, which pages are visited most often, where visitors encounter error messages.

These cookies do not store any information that would identify visitors to the websites. The information they collect is used only in aggregate and anonymised form. Their purpose is to improve the functionality and user experience of the Company's website. For example: has\_js cdrop



Cookies that collect data about the performance of the website can be disabled or deleted in the browser settings.

### **7.2.3. Storing custom settings**

These cookies allow us to store the username and selected language preference used on the website. For example, a website may be able to serve local news based on the geographic location of the visitor stored in the cookie. These cookies can store changed font size and other similar preferences. The preferences stored in the cookies are anonymous. Their stored values cannot be traced back to individual Data Subjects by the operator. For example: Drupal.tableDrag.showWeight Drupal.toolbar.collapsed

Cookies that store personal preferences can be disabled or deleted in the browser settings. You can find more information here.

Disabling this type of cookie will affect the functionality of the Company's website and thus the user experience.

### **7.2.4. Deleting a cookie**

You have the right to delete the cookie from your computer or to disable the use of cookies in your browser. You can usually manage cookies by going to the Tools/Preferences menu of your browser and selecting Privacy/Preferences/Custom Preferences, then selecting the cookie, cookie or tracking option. To find out more about what cookies your browser uses, please visit one of the following websites that are appropriate for your browser:

Google Chrome

(<https://support.google.com/chrome/answer/95647?hl=hu> )

Mozilla Firefox (<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>)

Windows Internet Explorer

(<https://support.microsoft.com/hu-hu/help/260971/description-of-cookies> )

## **7.3. Data processing by external service providers, their cookies**

### **7.3.1. Google Ads**

The data controller uses the online advertising program "Google Ads" and makes use of Google's conversion tracking service within its framework. Google Conversion Tracking is an analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When you reach a website through a Google ad, a cookie is placed on your computer to track conversions. These cookies have a limited validity and do not contain any personal data, so the Data Subject cannot be identified by them.

When you browse certain pages of the website and the cookie has not expired, Google and the data controller may see that you have clicked on the ad.

Each Google Ads Data Subject receives a different cookie, so they cannot be tracked through the Ads Data Subjects' websites.

The information, which is obtained through the use of conversion tracking cookies, is used to provide conversion statistics to Data Subjects who opt in to Ads conversion tracking. In this way, they are informed of the number of Contactees who click on their ad and are referred to a page with a conversion tracking tag. However, they do not have access to information that would allow them to identify any of their Contacts.

If you do not wish to participate in conversion tracking, you can opt out by disabling the option to set cookies in your browser. You will then not be included in the conversion tracking statistics.

More information and Google's privacy statement can be found at [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/)

### **7.3.2. Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the website you have visited.

The information generated by the cookies on the website used by the Data Subject is usually transferred to a Google server in the USA and stored there. By activating the IP anonymisation on the website, Google will previously shorten the IP address of the Data Subject within the Member States of the European Union or in other states party to the Agreement on the European Economic Area.

The full IP address will be transmitted to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity for the website operator and to provide other services relating to website activity and internet usage.

The IP address transmitted by the Data Subject's browser within the framework of Google Analytics will not be merged with other data held by Google. You may refuse the use of cookies

by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may also prevent Google from collecting and processing data (including IP address) about your use of this website by means of cookies by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=hu>

### **7.3.3. Use of social networking sites**

The Website uses social plugins from social networks such as Youtube, TikTok, Mailchimp, Facebook and Instagram.

#### **7.3.3.1. Facebook**

If you access a page on our website that contains such a plug-in, your browser will establish a direct connection with the Facebook or Instagram servers. Facebook or Instagram will transfer the content of the plug-in directly to your browser and integrate it into the page. Such integration allows Facebook or Instagram to receive information that your browser has accessed the corresponding page of our website, even if you do not have a profile on Facebook/Instagram or if you were not logged in to Facebook/Instagram at that moment.

Please consult Facebook's notes on the purpose and extent of Facebook's collection of data, your rights in this regard and the possible settings you can make to protect your privacy at the following link: <https://www.facebook.com/policy.php>. For an overview of Facebook plug-ins and how they appear, please visit: <https://developers.facebook.com/docs/plugins>. If you do not want Facebook to associate the data collected through our website directly with your Facebook profile, you must log out of Facebook before visiting our website. If you use plug-ins such as "Facebook blocker" for your browser, you can completely prevent Facebook plug-ins from being downloaded.

#### **7.3.3.2. Instagram**

The Website also makes use of the Instagram plug-ins ("Plugins") operated by Instagram. These modules are marked with an Instagram logo, for example, "Instagram Camera".

If the Data Subject clicks on the Instagram Logo, he/she will be taken directly to the Instagram page of the Website and his/her browser will establish a direct connection with the Instagram servers. The content of the Plugin is sent by Instagram directly to the visitor's browser, embedded in the website. In this way, Instagram receives information that the browser has visited the relevant page of the Website, even if the browser does not have an Instagram profile or is not logged in to Instagram.

The data protection rules regarding the purpose and scope of data collection, as well as the further processing and use of data by Instagram, can be found in the Instagram Privacy Policy: <https://help.instagram.com/155833707900388/>.

### 7.3.3.3. Youtube

You can check and update how your data is being managed under Google activity settings. Using Google Dashboard, you have the ability to control and manage the types of information that are associated with your Google Account. In the advertising settings, you can query and change the display specifications for Google ads. You can find information on this and further setting and selection options here (with further links):

<https://www.google.de/policies/privacy/>. You can also set your browser to block all cookies (including the provider's cookies) or to receive a report when a cookie from the provider is set. In addition, for mobile devices, you can restrict the service's access to contact and calendar data, photos, location data, etc. under the relevant settings options. You can also access and update your personal data under the privacy statement of the service: <https://www.google.de/policies/privacy/>.

Cookies and similar technologies also allow us to record your visits to this website and associate them with your profile. This data can be used to provide you with personalised content or advertising. Information on YouTube's contact options can be found here:

[https://www.google.com/intl/de\\_de/+policy/imprint.html](https://www.google.com/intl/de_de/+policy/imprint.html). Information on how YouTube processes the data obtained from your visit to the YouTube platform for its own purposes or transfers it to third parties can also be found in Google's privacy policy:

<https://www.google.com/intl/de/policies/privacy/>. Please note that YouTube may combine personal data with information and personal data from other Google services. Further information on this can be found here:

<https://www.google.com/intl/de/policies/privacy/example/combine-personalinformation.html>. If you have your own account, your activities on other sites and applications may also be combined with your personal data to improve YouTube or Google services or the advertising they publish. However, this will depend on your account settings. More information on this can be found here:

<https://www.google.com/intl/de/policies/privacy/example/your-activity-on-other-sites-and-apps.html>.

### 7.3.3.4. Tiktok

The consent given to TikTok is the legal basis for the processing of the videos and the viewers of the videos. In accordance with the criteria, its processor displays advertisements to persons registered on the TikTok platform, either randomly or targeted. The search criteria may be the data provided by the data subject in his/her TikTok profile or personal data generated by sharing or other activities, which data (the scope of the data and the way it is used) is governed by the TikTok Privacy Policy

(<https://www.tiktok.com/legal/page/eea/privacy-policy/hu>) and the TikTok Cookie Policy (<https://www.tiktok.com/legal/page/global/cookie-policy/hu>) and is not accessible by the data processor or the data controller.

It is up to the user to decide whether to give consent to targeted advertising and how much and what kind of personal data to share in relation to the mandatory data. Oxygeni Hair Ltd. does not record, has no access to, and does not transmit any data of the persons visiting the videos, and the above-mentioned TikTok information and regulations apply.

The TikTok account is accessed by the Marketing Manager and his/her approved staff. However, personal data may be transferred by TikTok to third countries, such as Singapore and the United States of America, which provides a lower level of protection of personal data compared to the GDPR. TikTok applies the standard contractual clauses (standard contractual clauses) under Chapter V of the GDPR.

## **8. Rights of data subjects (erasure, blocking, objection, etc.)**

The Data Subject may request information on the processing of his or her personal data and may request the rectification, erasure or blocking of his or her personal data, except for mandatory processing, by filling in the request form.

### **8.1. Right to information**

Upon the Data Subject's request, the Company, as Data Controller, shall provide information about the data processed by it or by a processor it has appointed, the source of the data, the purpose, legal basis and duration of the processing, the name and address of the data processor and its activities related to the processing, the circumstances of the data breach, its effects and the measures taken to remedy it, and, in the case of data transfer, the legal basis and the recipient of the data.

The Company shall provide the information in writing, in an intelligible form and at the request of the data subject, within the shortest possible time from the date of the request, but not later than 25 days.

This information is free of charge if the person requesting the information has not yet submitted a request for information to the controller for the same set of data in the current year. In other cases, the Company shall charge a fee. In the event of refusal to provide information, the Company shall inform the Data Subject in writing of the provision of the Information Act on the basis of which the refusal to provide information was made. In the event of refusal to provide information, the Company shall inform the Data Subject of the possibility of judicial remedy and of recourse to the Supervisory Authority (NAIH).

### **8.2. Right of rectification, right to add**

If the personal data is not accurate and the accurate personal data is available to the Company, the Company will correct the personal data.

Upon the Data Subject's written request, the Company shall, without undue delay, correct inaccurate personal data provided by the Data Subject in writing or in person at the Company's registered office, or complete the incomplete data with the content indicated by the Data Subject. The Company shall inform any recipient to whom it has disclosed the personal data of the rectification or completion, unless this proves impossible or involves a disproportionate effort. The Data Subject will be informed of the data of such recipients if he or she so requests in writing.

### **8.3. Right to erasure**

The Company will delete the personal data if:

- a) treatment is unlawful;
- b) the data subject requests (unless the processing is required by law);
- c) it is incomplete or inaccurate - and this condition cannot be lawfully remedied - provided that deletion is not precluded by law;

- d) the purpose of the processing has ceased or the statutory time limit for the storage of the data has expired (except for data whose data medium must be placed in archival custody pursuant to legislation on the protection of archival material);
- e) ordered by a court or the Authority.

The processing of data is unlawful if:

- a) the data are incomplete or inaccurate - and this situation cannot be lawfully remedied - provided that erasure is not excluded by law;
- b) the purpose of the processing has ceased or the statutory time limit for storing the data has expired;
- c) ordered by a court or the Authority.
- d) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- e) the data subject objects to the processing and there is no overriding legitimate ground for the processing;

Limits to data erasure:

- a) exercise of the right to freedom of expression and information;
- b) to comply with an obligation under Union or Member State law that requires the controller to process personal data or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) public interest in the field of public health;
- d) for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1) of Regulation EU 2016/679, where the right to erasure would be likely to render impossible or seriously impair such processing; or
- e) bringing, asserting or defending legal claims.

#### **8.4. Right to restriction of processing**

The Data Subject shall have the right to obtain from the Controller, at his or her request, the restriction of processing if one of the following conditions is met:

- a) the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- c) the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- a) the Data Subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller prevail over the legitimate grounds of the data subject.

If the processing is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject 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 Union or of a Member State.

The Data Controller shall inform the Data Subject at whose request the processing has been restricted in advance of the lifting of the restriction.

## **8.5 Right to data portability**

If the processing is necessary for the performance of a contract, or if the processing is based on the Data Subject's voluntary consent, the Data Subject has the right to request to receive the data provided by the Data Subject to the Company in a machine-readable form. If technically feasible, you may request that the data be transferred to another controller. In any case, the right is limited to the data provided by the Data Subject, no other data may be carried (e.g. statistics, etc.)

The Data Subject shall provide the personal data relating to him or her that are held in the Company's system:

- in a structured, widely used, machine-readable format,
- to another controller,
- may request the direct transfer of the data to another controller - if technically feasible in the controller's system.

The Company will comply with requests for data portability only on the basis of a written request sent by email or post. In order for the request to be granted, the Company must be satisfied that the Data Subject who is entitled to exercise the right is the person who intends to exercise it. The Data Subject may request the portability of data that he or she has provided to the Company under this right, but data generated by the Company (e.g. statistical data) cannot be used under this right. Exercising this right does not automatically entail the deletion of the data from the Company's systems, and therefore the Data Subject will remain registered in the Company's systems after exercising this right, unless he/she also requests the deletion of his/her data.

## **8.6 Objection to the processing of personal data**

The Data Subject may object to the processing of his or her personal data by means of a declaration to the Company if the legal basis for the processing is.

- public interest within the meaning of Article 6(1)(e) of the GDPR; or
- a legitimate interest within the meaning of Article 6(1)(f) of the GDPR.

In the event of the exercise of the right to object, the Company may no longer process the personal data concerned, unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims. The Company shall decide whether the processing is justified by compelling legitimate grounds. It will inform the Data Subject of its position in this regard in an opinion. The Data Subject may object in writing (by email or post). The Company may not delete the Data Subject's data if the processing is required by law. However, the data may not be transferred to the data recipient if the Company has agreed to the objection or if the court has ruled that the objection is justified.

## **8.7 Automated decision-making in individual cases, including profiling**

The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which would have legal effects concerning him or her or similarly significantly affect him or her.

The above right shall not apply if the processing is necessary for the conclusion or performance of a contract between the Data Subject and the Company; is permitted by Union or Member State law applicable to the Company which also lays down appropriate measures to protect the Data Subject's rights and freedoms and legitimate interests; or is based on the Data Subject's explicit consent.

The Company informs Data Subjects that it does not carry out profiling using the personal data provided.

### **8.8. Enforcement by others of the rights of the deceased Data Subject**

Within five years after the death of the Data Subject, the rights of the deceased during his or her lifetime, such as the rights of access, rectification, erasure, restriction of processing, data portability and objection, may be exercised by the person authorised by the deceased by means of an administrative order or a declaration in a public or private document of full probative value made before the Company. If the deceased has made more than one such declaration to the Company, the person named in the declaration made at a later date may assert these rights.

If the deceased did not make such a declaration, the rights to which the deceased was entitled during his or her lifetime and which are set out in the previous paragraph may be exercised by the close relative of the person concerned within five years of the death of the person concerned (in the case of more than one close relative, the first to exercise the rights shall be the closest relative).

The Civil Code defines a close relative as. 8:1 (1) 1) of the Civil Code, a spouse, a relative in the direct line of marriage, an adopted, step- or foster child, an adoptive, step- or foster parent and a brother or sister. The close relative of the deceased must provide proof:

- the fact and date of the death of the deceased person concerned by means of a death certificate or court order, and
- certifies his or her identity - and that of close relatives, if necessary - by means of a public document.

The person asserting the rights of the deceased - in particular in proceedings against the Data Controller and before the National Authority for Data Protection and Freedom of Information and the courts - shall be entitled to the rights and shall be subject to the obligations to which the deceased was entitled during his or her lifetime in accordance with the Data Protection Act and the Regulation.

Upon written request, the Company is obliged to inform the next of kin of the action taken, unless the deceased has expressly prohibited this in his/her declaration.

### **8.9. Procedural rules**

The Company shall inform the Data Subject of the measures taken without undue delay, but no later than one month after receipt of any request as defined in point 7. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by the Data Controller by a further two months, but in that case the Data Controller shall inform the Data Subject within one month of receipt of the request, stating the reasons for the delay. If the request is rejected, the Data Controller shall inform the Data Subject of the possibility of judicial remedy and of recourse to the Authority.

If the Data Subject's request is manifestly unfounded or excessive (in particular in view of its repetitive nature), the Company may charge a reasonable fee for complying with the request or refuse to act. The burden of proof shall be on the Data Controller.

If the Data Subject has submitted the request electronically, the Company will provide the information electronically, unless the Data Subject requests otherwise.

The Company shall inform any recipient to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing that it has carried out, unless this proves impossible



or involves a disproportionate effort. Upon the Data Subject's request, the Company will inform the Data Subject of these recipients.

### **8.10. Damages and compensation**

Any person who suffers pecuniary or non-pecuniary damage as a result of a breach of the Regulation shall be entitled to compensation from the Company or the data processor for the damage suffered. A processor shall be liable for damage caused by the processing only if it has failed to comply with the obligations expressly imposed on processors by law or if it has disregarded or acted contrary to lawful instructions from the Company. The Company or the processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

## **9. Enforcement options**

You can exercise your rights by sending a written request by email or post.

The Data Subject cannot enforce his or her rights if the Company proves that it is not in a position to identify the Data Subject. If the Data Subject's request is manifestly unfounded or excessive (in particular in view of its repetitive nature), the Company may charge a reasonable fee for complying with the request or refuse to act. The burden of proof shall be on the Company. If the Company is in doubt as to the identity of the natural person making the request, it may request further information necessary to confirm the identity of the applicant.

On the basis of the Info.tv., the Regulation and the Civil Code (Act V of 2013), the Data Subject is entitled to.

- a. You can contact the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/c.; [www.naih.hu](http://www.naih.hu)) or
- b. Enforcing your rights before the courts: you can go to court if your rights are infringed. If the Data Subject has the right to a judicial remedy, the Data Controller may challenge the processing of the data. The courts have jurisdiction to rule on the case. The Data Subject may choose to bring an action before the courts for the place of residence or domicile of the Data Subject (for a list of courts and their contact details, please consult the following link: <http://birosag.hu/torvenyszekek>).

The Data Controller shall notify the Data Subject of rectification, blocking, flagging and erasure, as well as all those to whom the data were previously transmitted for processing. It shall refrain from such notification if this does not prejudice the legitimate interests of the Data Subject in relation to the purposes of the processing.

## **10. Security principles for data processing**

The Company selects and operates the IT tools used to process personal data in the course of providing the service in such a way that the data processed:

- a) is accessible to authorised persons (availability);
- b) authenticity and verification (authenticity of processing);
- c) can be verified to be unchanged (data integrity);

d) be protected against unauthorised access (data confidentiality).

The Company shall ensure the security of data processing by technical, organisational and organisational measures that provide a level of protection appropriate to the risks associated with the processing.

In the course of data processing, the Company shall keep

- a) confidentiality: it protects information so that only those who are entitled to it have access to it;
- b) integrity: it protects the accuracy and completeness of the information and the method of processing;
- c) availability: ensuring that when the authorised user needs it, he or she can actually access the information and has the means to do so.

The Company's IT system and network are protected against computer fraud, espionage, sabotage, vandalism, fire and flood, computer viruses, computer intrusions and attacks that lead to denial of service. The operator ensures security through server-level and application-level protection procedures.

We inform the Data Subjects that electronic messages transmitted over the Internet, regardless of the protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that could lead to fraudulent activity, contract disputes, or disclosure or modification of information. The Company will take all reasonable precautions to protect against such threats. It monitors systems to record and provide evidence of any security incidents. System monitoring also allows the effectiveness of the precautions taken to be checked.

### **Backup management policy**

The Data Controller shall ensure, in particular, that measures are in place to ensure the possibility of restoring data files, including regular backups and the separate and secure management of copies (backups), as part of its duties relating to the protection of information systems.

Accordingly, in order to prevent the loss of electronically stored data, the Data Controller regularly backs up the data in its database, including personal data, on a separate storage medium on a monthly and annual basis.

The location of the backups is Gábor Toronyai e.v. Duration of backup storage: 1 year

Schedule for deleting backups: monthly

Access to the backup: Access to the backup is restricted, only persons with specific rights have access. Access to data is only possible after proper identification (at least username and password). Restoring backups is only possible in the event of system destruction or data loss, at the initiative of the authorised person and with the approval of the company's CEO.

## **11. Declaration of rights**

The Company publishes information and documents on the Website for information purposes only. The trademarks and logos displayed, as well as the information and other materials available, are protected by copyright and the rights thereto are the exclusive property of the Data Controller.

The trademarks on the Website are protected by trademark law. They may not be used, copied, distributed or published by any third party in any manner or under any title without the express prior written consent of the owner. You may not create a link to any other website from the Website without prior written consent. Unauthorised use may result in prosecution under copyright, civil and criminal law.

The Data Subject may use the information in its original form, download it to his or her computer or print

it out for his or her own purposes only. This authorisation only allows the processing and archiving of an original copy of the website.

The Company does not guarantee the accuracy, reliability or content of the website displayed on the screen of the Data Subject, unless otherwise provided by law, for changes of any nature whatsoever, independent of the Company.

The Company reserves the right to modify the content of the Website and to remove its availability.

The Company does not guarantee or warrant that access to the Website will be uninterrupted or error-free.

The Company shall not be liable for any damage or loss arising from access to or use of the Website, the information and documentation contained therein, or from any direct or indirect use thereof, or from the inoperability to use the Website, or from any failure, defect, malfunction or ambiguity of the Website.

The Company shall not be liable for any material created, transmitted or published by third parties that is linked to or referenced from the Company's website.

If the Data Subject provides written material to the Company, the Data Subject acknowledges that it is suitable for publication and agrees that the Company may publish it, without any liability, and use its content in whole or in part, with attribution of authorship. The data subject hereby also undertakes that the document or content made available does not infringe the copyright or other rights of any third party, and shall not bring any legal proceedings against the Company in connection therewith, or make any claim or assert any claim, and shall indemnify the Company in the event of any third party claim.

The Company's website may also provide different provisions from these regulations in accordance with the legislation in force, so the knowledge and acceptance of the current regulations and terms of use is a condition of the use of certain services.

This Policy constitutes a copyright work and may not be copied, reproduced, retransmitted, distorted, mutilated in whole or in part, used, exploited, processed or sold in whole or in part without the written consent of the author. The author of this Policy is the Data Controller.

## **12. Other provisions**

### **12.1. Applicable law**

Any disputes relating to the Company and its services shall be subject to the jurisdiction of the Hungarian courts, subject to Hungarian law.