# PRIVACY STATEMENT

and data management information for visitors and users of the website www.mona-fresh.eu

## 1. INTRODUCTION

A www. mona-fresh . eu - hereinafter referred to as a web page - the owner of the Mona Clean Star Ltd. and. operated by DBA Consultants and Solutions LTD. (hereinafter referred to as a data handler), as Data handling: Describes for data treatment publishing this Privacy Policy and Privacy (Privacy Policy hereinafter) principles which the Data Controllers recognize as binding on them. The Data Controllers do everything reasonably take the necessary action to ensure the security of the personal data it processes.

Please read this Privacy Statement before using our Website, which clearly explains how we handle your personal information! In the Privacy Statement, the Data Controllers shall clearly and in detail inform the data subjects of all relevant facts relating to the processing of the data.

During the operation of the website, the Data Controllers manage the data of the persons registered on the website in order to provide them with a suitable service. The service provider intends to comply fully with the legal requirements for the processing of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council.

This data management notice has been prepared pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of personal data of natural persons and the free movement of data, subject to Annex CXII of the content of the law on the right to information self-determination and freedom of information.

### Service Provider, Name of Data Controllers

Name: Mona Clean Star Kft. Headquarters: 222 0, Monor Hegyesi tanya 48

Name: DBA Consultants and Solutions Kft. Headquarters: 2225, Üllő Boszik József

krt. 35 Website name and address: www. mona-fresh . eu

### The data handling contact

Name: Mona Clean Star Kft. Headquarters: 2220, Monor Hegyesi tanya 48

E-mail: info @ mona -fresh.eu Phone: +36 7 0 607 08 83

Name: DBA Consultants and Solutions Kft. Headquarters: 2225, Üllő Boszik József krt. 35 E-

mail: info @ dbaconsol .hu Phone: +36 20 382 34 78

Website name, address: www. mona-fresh . eu

# 2. DEFINITIONS

• personal data: any information relating to an identified or identifiable natural person (data subject); identifies a natural person who, directly or indirectly, in particular by reference to an identifier such as name, number, location, online identifier or one or

more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;

- data subject: any natural person identified or identifiable, directly or indirectly, on the basis of personal data
- data subject's consent: a voluntary, specific and well-informed and unambiguous statement of the data subject's consent to indicate his or her consent to the processing of personal data concerning him or her, by means of a statement or an unequivocal statement of confirmation:
- Data controllers: any natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; If the purposes and means of processing is determined by the EU or Member State law, the Data handling this or the data handling special criteria for the designation define the EU or national law.
- data management: any operation or set of operations on data, regardless of the procedure used, in particular their collection, recording, recording, systematisation, storage, alteration, use, retrieval, transmission, disclosure, coordination or aggregation, blocking, erasure and destruction; and prevent further use of the data, take photographs, sound or images, and record physical identifiers (eg fingerprints or palm prints, DNA samples, irises)
- data erasure: making the data unrecognizable in such a way that it is no longer possible to recover it
- data processor: a natural or legal person, public authority, agency or any other body that processes personal data on behalf of Data Controllers;
- data processing: the performance of technical tasks related to data management operations, regardless of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data
- data set: the totality of the data managed in one register
- data protection incident: a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored or otherwise handled.
- recipient: any natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not. Public authorities that may have access to personal data in the framework of an individual investigation in accordance with Union or Member State law shall not be considered as 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;
- Third Party means any natural or legal person, public authority, agency or any other entity that is different from the data subject, the data handling k out, the data processor and the persons who are data controllers under or direct control of data processing processing of personal data authorized they got.
- information society service: a service provided electronically, for absenteeism, usually for remuneration, to which the recipient of the service has individual access
- e-commerce service: an information society service for the purpose of holding a movable movable item, including money and securities, and natural forces that can be used for that purpose, a service, real estate, property right (hereinafter: commodity) sale, purchase, exchange or other use.
- GDPR (General Data Protection Regulation ): the new Data Protection Regulation of the European Union;

# 3. RANGE OF USERS

User is both a natural person registered on the Site and a natural person who is not registered but uses the services of the Website and is identified or - directly or indirectly - identifiable on the basis of any specific personal data.

## 4. PRIVACY POLICY

The Data Controllers declare that they process personal data in accordance with the provisions of the data management information and comply with the requirements of the relevant legislation, in particular with regard to the following:

- The processing of personal data must be carried out lawfully and fairly and in a way that is transparent to the data subject.
- Personal data may only be collected for specified, explicit and legitimate purposes.
- The purpose of the processing of personal data must be appropriate and relevant and only to the extent necessary.
- Personal information must be accurate and up to date. Inaccurate personal data must be deleted immediately.
- Personal data must be stored in such a way as to enable identification of data subjects only for as long as is necessary. Personal data may be stored for a longer period only if the storage is for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes.
- The processing of personal data must be carried out in such a way as to ensure adequate security of the personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, by means of appropriate technical or organizational measures.
- The principles of data protection shall apply to all information concerning an identified or identifiable natural person.

# 5. IMPORTANT DATA MANAGEMENT INFORMATION

- The purpose of data management is to provide contact, information and additional services.
- Legal basis for data processing: consent of the data subject.
- Stakeholders in data management: registered users of the website (newsletter subscribers, those interested through the form).
- Duration of data management and deletion of data: The duration of data management always depends on the specific user purpose, but the data must be deleted immediately if the originally set purpose has already been achieved. Your consent to the processing may be withdrawn at any time by the person concerned by sending a letter to the contact e-mail address. If there is no legal impediment to the deletion, then your data will be deleted.
- The data controllers and their employees have the right to get acquainted with the data .
- The data subject may request from the Data Controllers access to, rectification, erasure or restriction of the processing of personal data concerning him or her and may object to the processing of such personal data and to the data subject's right to data portability.
- The data subject may withdraw his or her consent to the processing at any time, but this shall not affect the lawfulness of the processing carried out prior to the withdrawal.
- The person concerned may exercise the right to lodge a complaint with the supervisory authority.

- If the person concerned wishes to take advantage of the benefits of registration, ie to use the services of the website for this purpose, it is necessary to provide the requested personal data. The data subject is not obliged to provide personal data, and there are no adverse consequences for the non-provision of data. However, it is not possible to use certain functions of the website without registration.
- The data subject has the right, at the request of the Data Controllers, to correct or supplement inaccurate personal data concerning him / her without undue delay.
- The data subject has the right, at the request of the Data Controllers, to delete inaccurate personal data concerning him without undue delay, and the Data Controllers are obliged to delete the personal data concerning the data subject without undue delay, unless there is another legal basis for the data processing.
- Modification or deletion of personal data can be initiated by e-mail, telephone or letter using the contact options provided above.

# 6. COMPLETE THE CONTACT FORM ON THE WEBSITE

The Data Controllers use the data accessed by the contact form received through the website only for the purpose of contact and provision of information, they do not store the data in a database.

## 7. SENDING A NEWSLETTER

As the operator of the website, we declare that we fully comply with the relevant legal provisions in the information and descriptions published by us. We also state that when subscribing to a newsletter, we are not in a position to verify the authenticity of the contact information or to establish that the information provided relates to an individual or business. We treat companies that contact us as customer partners.

The purpose of data management is to send professional brochures, electronic messages containing advertisements, information, newsletters, about which you can unsubscribe at any time without consequences. You can also unsubscribe without any consequences if your business has in the meantime ceased to exist, you have left the business, or someone has provided us with your contact information.

The legal basis for data processing is your consent. We inform you that the user may in advance and expressly consent to being contacted by the service provider with advertising offers, information and other items at the e-mail address provided during registration. As a result, the user may consent to the service provider processing the necessary personal data for this purpose.

We would like to inform you that if you want to receive a newsletter from us, you must provide the necessary information. If we do not provide the information, we will not be able to send you a newsletter.

Duration of data processing: Data processing will take place until the withdrawal of consent. You can withdraw your consent to data management at any time by sending an e-mail to the contact e-mail address.

The data will be deleted when the consent to the data processing is revoked. You may revoke your consent to data management at any time by sending an email to your contact email address.

Consent can also be revoked based on the link in the newsletters sent out.

The data controllers and their employees are entitled to access the data . Method of data storage: electronic. Modification or deletion of data can be initiated by e-mail, telephone or letter using the contact options provided above. The data processor used: PaprikaSoft Kft.

Scope of managed data	The specific purpose of the data management data
Name	Identification, contact
E-mail	Identification, contact
Date of subscription	Technical information operation
IP address	Technical information operation

Please note that the e-mail address does not need to contain any personally identifiable information. For example, it is not necessary for the e-mail address to include your name. You are completely free to choose an email address that contains information about your identity. The e-mail address used for contact is absolutely necessary for the newsletter or professional information sent to you to reach its destination.

## 8. PERSON RESPONSIBLE FOR DATA PROCESSING

Mona Clean Star Kft. (Headquarters: 222 0, Monor Hegyesi tanya 48, Company registration number: 13 09 1 97016, Tax number: 25515941 -2-1 3, hereinafter: Data Processor) is entitled to process personal data as a Data Processor. The personal data to be processed may be disclosed to the current legal representative (s), employees / agents / contributors of the Data Processor. The processor shall not transfer personal data to third parties unless the data subject has given his or her express consent.

### **Hosting provider**

The information you provide is stored on a server operated by your hosting provider. The data can only be accessed by our employees and the employees operating the server, but they are all responsible for the secure handling of the data.

Name of the activity: hosting service, server service. The purpose of data management is to ensure the operation of the website. Data processed: personal data provided by the data subject

Duration of the data management and deadline for deleting the data: The data management until the end of the operation of the website or according to the contractual agreement between the website operator and the hosting provider. If necessary, the person concerned may also request the deletion of his data by contacting the hosting provider.

Legal basis for data processing: consent of the data subject or data processing based on law.

# 9. DURATION OF DATA PROCESSING

The Data Controllers process the personal data provided on the basis of the User's consent until the purpose of the data management is realized or the User's consent is revoked. The Data Controllers process the personal data provided by the User during the registration until the termination of the use of the Website, in particular until the cancellation of the registration.

The data handling different provisions of the recorded personal data law in the absence of a) to ensure compliance with the relevant legal obligations, or b) the data managers to validate or third person having a legitimate interest in, if the application of that interest is a restriction of the right to personal data protection ratio without further specific consent, and after the withdrawal of the data subject's consent. / CXII of 2011 Section 6 (5) of the Act /

In order to fulfill the accounting obligations, the Data Controllers may use the personal data provided by the User for 8 years pursuant to Section 169 of Act C of 2000, and pursuant to

Section XCII of 2003 on the Taxation Procedure. retained and managed within the statutory limitation period.

# 10. DATA TRANSMISSION, DATA LINKING

The Data Controllers do not sell, rent or in any way make available personal data or information about the User to any other company or individual.

The Data Controllers shall ensure the appropriate security of the data in the manner expected of them and shall take the technical and organizational measures that guarantee the enforcement of data protection rules and principles and promote the security of personal data.

We inform Dear Users that the Data Controllers will only transfer personal data to third parties or persons with the consent of the data subject.

## 11. COOKIES

The cookies are placed on the websites visited by the user's computer and contain information such as page settings or check status.

The cookie's So small files created by websites you visit. Saving browsing data improves the user experience. With the help of cookies, the website remembers the settings of the website and offers locally relevant content.

The website of the service provider sends a small file (cookie) to the computer of the visitors of the website in order to determine the fact and time of the visit. The service provider informs the visitor of the website about this.

Stakeholders: visitors to the website. The purpose of data management: additional services, identification, tracking of visitors. Legal basis for data management: The consent of the user is not required if the service provider absolutely needs the use of cookies. The scope of the data: unique identification number, time, setting data. The user has the option to delete cookies from the browsers at any time in the Settings menu. You are entitled to Data Privacy & Security 's: not to use personal data for the use of cookies Data Managers. Method of data storage: electronic.

# 12. COMMUNITY SITES

A social site is a media tool where a message is disseminated through social users. Social media uses the Internet and online publishing opportunities to move users from content recipients to content editors.

Social media is an interface for web applications that contains user-generated content, such as Facebook, Google+, Twitter, and more.

Social media appearances can be public speaking, lectures, presentations, products or services.

Social media information can take the form of forums, blog posts, images, videos, and audio, message boards, e-mail messages, and more.

As mentioned above, the scope of the managed data can be not only personal data but also the user's public profile picture.

Stakeholders: all registered users. The purpose of data collection is to promote the website or a related website. The legal basis for data processing is the voluntary consent of the data subject. Duration of data management: according to the regulations that can be viewed on the given social site. Deadline for deleting data: according to the regulations that can be viewed on the given social site. They have the right to get acquainted with the data: according to the regulations that can be viewed on the given social site. Rights related to data management:

according to the regulations that can be viewed on the given social site. Method of data storage: electronic.

It is important to note that when a user uploads or submits any personal information, he or she gives the social network operator permission to store and use such content. Therefore, it is very important to make sure that the user has full authority to communicate the published information.

## 13. GOOGLE ANALYTICS

Our website uses Google Analytics .

#### Google Analytics when using :

Google Analytics internal cookie -k (cookies prepare a report for clients on the basis of) behavior of web users.

On behalf of the website operator, Google uses the information to evaluate how users use the website. As an additional service, it prepares reports related to the activity of the website for the website operator in order to perform the additional services.

The data is stored in an encrypted format on Google's servers to make it more difficult and prevent data misuse.

#### Here's how to disable Google Analytics . Quote from the page:

Website users who do not want Google Analytics to report JavaScript on their data can install the Google Analytics Disable Browser Add-on. The plugin prohibits Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sending information to Google Analytics. The browser extension can be used in most newer browsers. The Google Analytics Disable Browser Plugin does not prevent data from being sent to the site itself and other web analytics services.

https://support.google.com/analytics/answer/6004245?hl=en\_US

The Google Privacy Policy: https://policies.google.com/privacy?hl=hu

Information on the use and protection of the data can be found in detail at the links above.

## 14. DATA PROTECTION IN DETAIL

https://static.googleusercontent.com/media/www.google.com/en//intl/en/policies/privacy/google\_p\_rivacy\_policy\_en.pdf

# 15. RIGHTS RELATED TO DATA PROCESSING

#### Right to request information

You can request information from us through the contact details provided, what data of our company, on what legal basis, for what data management purpose, from what source, for how long. Upon your request, we will send you information without delay, but no later than 30 days, to the e-mail contact you provided.

#### Right to rectification

You can ask us to change any of your details via the contact details provided. We will take action on your request immediately, but within a maximum of 30 days, and we will send you information by e-mail.

### Right of cancellation

You can ask us to delete your data via the contact details provided. At your request, we will do this immediately, but within a maximum of 30 days, and we will send information to the email contact you provided.

#### Right to lock

You can ask us to block your data via the contact details provided. The lock lasts as long as the reason you specify requires the data to be stored. At your request, we will do this immediately, but within a maximum of 30 days, and we will send information to the email contact you provided.

#### Right to protest

You can object to the data management via the contact details provided. We will investigate the protest as soon as possible, but no later than 15 days from the submission of the application, we will make a decision on the merits of it and we will inform you about its decision by e-mail.

# 16. POSSIBILITY OF ENFORCEMENT RELATED TO DATA PROCESSING

In case of any illegal data processing you experience, notify our company, so that you have the opportunity to restore the legal status in a short time. We will do our best to solve the problem outlined.

If you consider that the legal status cannot be restored, please notify the authority at the following contact details:

#### **National Data Protection and Freedom of Information Authority**

Postal address: 1530 Budapest, Pf .: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c Phone: +36 (1) 391-1400 Fax: +36 (1) 391-1410 E-mail: customer service (at) naih .hu URL https://naih.hu Coordinates: N 47 ° 30'56 ": E 18 ° 59'57 "

# 17. LEGISLATION UNDERLYING DATA PROCESSING

- REGULATION (EU) 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 (general data protection regulation).
- 2011 CXII. Act on the Right to Information Self-Determination and Freedom of Information.
- Act LXVI of 1995 on Public Documents, Public Archives and the Protection of Private Archival Material, law.
- Decree 335/2005 on the general requirements for the management of records of bodies performing public tasks. (XII. 29.) Government Decree.
- CVIII of 2001 Act on Certain Issues in Electronic Commerce Services and Information Society Services.
- Act C of 2003 on electronic communications.

Date of entry into force of this Privacy Statement: 2021.04.01. The Data Managers reserves the right to change.