

Privacy Policy

The handling of personal data provided by you is managed by:

Pneucom Bt.

Registered Office: H-1161, Budapest, Pálya utca 93.

Tax Identification Number: 21484126-2-42

Company Registration Number: 01 06 753916

Registration Court: Metropolitan Court as Company Court

- hereinafter referred to as the "**Data Controller**".

Please read this Privacy Policy (hereinafter referred to as the "**Policy**") carefully, which outlines our practices regarding the handling of your personal data in accordance with 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, known as the General Data Protection Regulation (GDPR). This Policy applies to individuals (referred to as "**you**") who are consumers availing themselves of the services of the Data Controller. It explains how the Data Controller collects, uses, and, in certain cases, shares your personal data with third parties. It also provides information regarding your rights as a data subject.

The Data Controller is committed to protecting the personal data and privacy of individuals visiting this website. This Policy primarily concerns the confidential handling and protection of personal data transmitted over the internet in relation to customers and newsletter subscribers, but it also applies to website visitors. We summarize how the Data Controller collects and utilizes data pertaining to you, as well as how such data may be utilized. Data will not be disclosed to unauthorized parties and will be used strictly in the manner described in this Policy.

The purpose of data processing may vary on a case-by-case basis as specified in the respective contract.

This Policy provides important information about the protection of your personal data and your rights in relation to it. If the user does not accept these terms, they have the right to suspend the use of the website and terminate browsing without providing personal data.

DATA CONTROLLER'S RESPONSIBILITY AND CONTACT INFORMATION

1.1 Information regarding data processing

With regard to the data processing described in this Policy, **Pneucom Bt.** is the data controller (hereinafter referred to as the "**Data Controller**").

For any inquiries, questions, or complaints related to our data protection practices, you can reach us at the following contact details: **Pneucom Bt., H-1161, Budapest, Pálya utca 93**, or email us at pneucom@pneucom.hu.

Data Controller	Responsibilities
Pneucom Bt. H-1161, Budapest, Pálya utca 93	All activities

You have the option to access our websites without providing your personal data. However, the acceptance of the cookie policy is essential for browsing. In the case of newsletter subscriptions, the approval of the privacy policy and statement is required. Personal data refers to any information relating to an identified or identifiable natural person. If the Data Controller collects your personal data, the data collection process is transparent and involves confidential data processing.

Your personal data includes information that can identify you, such as surname, first name, nationality, phone number, mailing address, and email address. The Data Controller collects your voluntarily entered personal data during your browsing session, specifying the necessary data required for the intended purpose. If you choose not to provide this data, you may not have access to certain features or services of the website. The collection of optional data serves to understand user preferences and improve the website and services.

The Data Controller takes all necessary measures to ensure the personal data it manages is accurate and up-to-date.

The following personal data is processed:

- Surname, first name, company name, and contact person's name (in the case of companies)
- Registered office address (in the case of companies), residential address, mailing address
- Email address
- Phone number
- System information (IP address, system version, resolution, statistics on pages viewed on the website, browsing habits, behavioral patterns)

Duration of the storage of personal data:

- For direct marketing purposes, until the user withdraws consent
- For profile data, up to 4 years from the last login
- For purchase data, as required by Section 169 § (2) of the Accounting Act, for 8 years

Conditions for Data Transmission

The Data Controller may, to an extent necessary, transmit the data it manages to individuals and companies designated by the Data Controller in the following areas:

- Data processing
- Legal representation
- Authorities entitled to handle legal disputes under applicable laws
- Service providers
- Professionals providing consultancy or support services to the Data Controller

Data Processors

During the process of online purchases in the webshop, the Data Controller (based on the User's selected method of delivery) shall transmit the User's name, shipping address (including the email address and telephone number in the case of courier service) for the purpose of coordinating the delivery time, as well as relevant information pertaining to the product's purchase price (whether to be collected on delivery or prepaid) to the designated delivery company, with the sole objective of facilitating the successful delivery of the product to the User.

The following entities are considered data processors and are entrusted with the responsibility of providing courier services on behalf of the Data Controller:

- **GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.**
(registered office: H-2351 Alsónémedi, GLS Európa u. 2., company registration number: 13-09-111755, tax number: 12369410-2-44)
- **DHL Express Magyarország Kft.**
(registered office: H-1185 Budapest, BUD Nemzetközi Repülőtér repülőtér 302. ép., company registration number: 01 09 060665, tax number: 10210798-2-44)

By accepting this Policy, the User hereby acknowledges and agrees to abide by the General Terms and Conditions established by the selected delivery company.

Entities and individuals involved in data processing or data management

The Data Controller, **Pneucom Bt.**, assumes the responsibility for handling the data. Apart from the Data Controller, other companies participate in the management and storage of contractual customer data.

Which companies are associated with data processing?

The following companies are involved in data processing within the scope of the Data Controller's activities:

- Accountant: **Jáger és Társa Bt.**, H-1171 Budapest, Császárfa u. 24., Company registration number: 01 06 510420, jagerbt@digikabel.hu - privacy policy link
- Hosting service provider: **Tárhely.eu Kft.**, H-1144 Budapest, Ormánság u. 4. X/241, Company registration number: 01 09 909968, support@tarhely.eu - [privacy policy](#)
- **Google Inc.**: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, [additional contact information](#), email system, cloud-based data and file storage, online document management, as well as related services: Google Drive, Google Docs, Google Search Console, Google Analytics, Google AdSense, Google AdWords, YouTube, Blogger, Chrome browser support - Google's [privacy policy](#) and [data protection principles](#).
- In exceptional cases, the contract may involve additional data processors.

Ownership rights of data and enforcement of rights

Should the User prefer to restrict the utilization of their personal data for commercial solicitations, they possess the right to prohibit such usage without the obligation to provide any justification. The User is required to submit their deletion request in writing to the Data Controller, either via email or postal mail, utilizing the contact details specified within the "Contact" section.

Protection of personal data of minors and legally incapacitated individuals

The website of **Pneucom Bt.**, along with its content, is primarily intended for individuals above the age of 13. Personal data of children under the age of 13 is neither processed nor collected without verifiable consent from their parents or legal guardians. Parents or legal guardians reserve the right to request the release or deletion of data pertaining to their children. In the event that the Data Controller becomes aware of the individual's underage status during the data processing, the data may be utilized for the purpose of obtaining parental consent.

Consent of the legal representative is required for declarations made by legally incapacitated individuals or limitedly capable minors, with the exception of service components involving routine mass registration, which do not require further deliberation.

Management of cookies

For comprehensive information regarding the management of cookies, please consult the Cookie Policy.

Definitions

- **Authority:** National Authority for Data Protection and Freedom of Information (registered office: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c., telephone: 06-1 391-1400, fax: 06-1 391-1410, email: ugyfelszolgalat@naih.hu, website: naih.hu)
- **Consent of the Data Subject:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **Data Subject:** Any identified or identifiable natural person.
- **Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.
- **Data Processor:** A natural or legal person, public authority, agency, or any other body that processes personal data on behalf of the data controller.
- **Data Processing:** Any operation or set of operations performed on personal data or sets of personal data, whether automated or not, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Data Transmission:** The act of making personal data processed by the data controller accessible to third parties.

- **General Terms and Conditions:** The set of general contractual terms and conditions governing the sale of products and services published on the website.
- **Identifiable Natural Person:** A natural person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Partner/Customer:** A natural person who enters into a contract with the Data Controller for the sale of products or provision of services.
- **Personal Data:** Any information relating to a data subject.
- **Recipient:** A natural or legal person, public authority, agency, or any other body to whom the personal data is disclosed, whether a third party or not.
- **Registration:** The process of recording personal data of the website user, resulting in the creation of a user account.
- **Service:** The product sales and other services provided by the Data Controller to its customers, partners, and users, as detailed in the General Terms and Conditions.
- **Third Party:** A natural or legal person, public authority, agency, or any other body other than the data subject, the data controller, the data processor, and the persons who, under the direct authority of the data controller or data processor, are authorized to process personal data.
- **Users:** Visitors to the websites operated by the Data Controller, accessible at <https://pneumatikashop.hu>, <https://pneucom.hu>, <https://segedrugo.hu>, <https://pneumatikashop.eu>, and other designated addresses.
- **Website:** The websites operated by the Data Controller, accessible at <https://pneucom.hu>, <https://segedrugo.hu>, <https://pneumatikashop.hu>, <https://pneumatikashop.eu>, and other designated addresses.

By providing your personal data, you consent to the processing of your data as described in this Policy. You have the right to access, rectify, or erase your personal data, restrict its processing, object to its processing, and exercise your right to data portability in accordance with applicable data protection laws.

We take appropriate technical and organizational measures to protect your personal data against unauthorized access, disclosure, alteration, or destruction. However, please note that no method of transmission over the

internet or electronic storage is completely secure. Therefore, while we strive to protect your personal data, we cannot guarantee its absolute security.

By continuing to use our services and providing your personal data, you acknowledge that you have read and understood this Policy and agree to the processing of your personal data as described herein.

This Policy may be updated from time to time to reflect changes in our data processing practices. We recommend that you review this Policy periodically to stay informed about how we handle your personal data.

If you have any questions or concerns regarding this Policy or the processing of your personal data, please contact us using the contact information provided above.

Sincerely,

**Pneucom Bt.
Data Controller**