

Privacy policy regarding the use of cookies

I. Name of Data Controller

Company name: Soh-O-White Kft
Headquarters: 1165 Budapest, Margit utca 114. 29. intact. 1st floor 2.
Tax number: 26558651-2-42
Represented by: Tamás Vadász
Email: info@ozonewgs.com

II Legislation for data processing

The following laws apply to data processing:

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to processing of personal data and free movement of such data, and the Repealed Directive (EC) No 95/46, text in force:

<https://eurlex.europa.eu/legal-content/HU/TXT/PDF/?uri=CELEX:32016R0679&from=HU>

Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter: Right on information), text in force:

<https://net.jogtar.hu/jogszabaly?docid=A1100112.TV>

Act XLVIII of 2008 on essential conditions of and certain limitations to business advertising, text in force:

<https://net.jogtar.hu/jogszabaly?docid=A0800048.TV>

Act CLV of 1997 on Consumer Protection, text in force:

<https://net.jogtar.hu/jogszabaly?docid=99700155.TV>

III Information on processed data

Scope of data processed by the data controller: the online ID of the data subject.

Legal basis for data processing: Consent of the data subject

Duration of data processing: Until withdrawal of consent

IV. About cookies in general

(1) Cookies are short data files that are placed on the user's computer by the website you visit. The purpose of cookie is to make the particular infocommunication technologies and Internet services easier and more convenient. There are several varieties of it, but generally they can be classified into two large groups. One is a temporary cookie that the website store on the user's device only during a specific session (e.g., under security identification for internet banking), and the other is a permanent cookie (e.g., the language setting of a website), which remains on the computer until the user who downloaded it does not delete it. According to European Commission guidelines, cookies (unless they are essential for the use of the given service) may be stored on the user's device only upon user's consent.

(2) In the case of cookies that don't require user's consent, the information shall be provided during the first visit to the website. It is not necessary that the full text of the Cookie Notice be displayed on the website, a brief summary of the essence of the information provided by the operators with referring to the availability of the full notice with a link.

(3) In the case of consent cookies, the information may also be linked to the first visit to the website if the processing of the data related with the use of cookies begins with the visit to the site. If the cookie is used in connection with the use of the function explicitly requested by the user, the information may also be provided on use of this function. In this case, display of full text of the Cookie Notice on the webpage, a brief summary of the essence of the information and a link to the availability of the full notice is sufficient. The visitor shall be informed of use of cookies on the website in the privacy notice provided in the annex to these regulations. With this notice, the Data Controller ensures the visitor of its webpage any time to be able to learn about what kind of data the Data Controller for what purposes, including processing of data that cannot be directly linked to the user.

V. Cookies used

The Data Controller informs its users that the programs Google Analytics, Google Remarketing, AdWords Conversion Tracking and Facebook Remarketing are used in order to measure the traffic of the Webpage and its subpages and to monitor a behavior of the visitors, generate statistics and improve advertisement.

The referenced programs place so called cookies on the user's computer, which collect user data. Visitors to the website (Data Subjects) give their consent to the Controller to access Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing programs. At the same time they allow the Data Controller to monitor, track their user behavior and use all services provided by this programs. In addition, the user has the option of disabling the future recording and storage of data at any time, as described below.

We inform our users that the settings and use of Google Analytics, Google Remarketing, AdWords Conversion Tracking and Facebook Remarketing programs are fully compliant with the requirements of the data protection authority.

According to Google's information, Google Analytics mainly uses first-party cookies to report visitor interactions on the website. These cookies only record information not suitable for personal identification. Browsers do not share their own cookies between domains. More information about this cookies can be found in the Google Advertising & Privacy FAQ.

1. Google Analytics:

The Data Controller uses Google Analytics primarily to generate statistics, including measuring the effectiveness of its campaigns. By using the program, the Data Controller mainly acquires information about how many visitors have visited the Website and how much time the visitors have spent on the Website. The program recognizes the visitor's IP address in order to identify whether the visitor is a returning or a new visitor and track the path taken by the visitor on the Website and their entry pages.

1. Google Remarketing:

Using the Google Remarketing program, the Data Controller in addition to the usual data of Google Analytics also collects DoubleClick cookie data. The DoubleClick cookie allows you to use a remarketing service, which primarily ensures that visitors of the Website will later meet the Data Controller's ad on free Google advertising platforms. The Data Controller uses the Google Remarketing program for online advertising. External service providers, such as Google, also display data Controller's advertisements on internet sites. The Data Controller and third-party service providers, such as Google, use both their own cookies (such as Google Analytics cookies) and third-party cookies (such as DoubleClick cookies) concurrently to learn from previous visits of the users of the Webpage as well as to optimize ads and to display them.

1. Google AdWords conversion tracking:

Google AdWords conversion tracking is designed to help Data Controller measure the effectiveness of AdWords ads. This is done through cookie placed on the User's computer where it stays for 30 days and does not collect any personal data.

1. Facebook Remarketing

The Data Controller uses the remarketing Pixel of Facebook to increase the effectiveness of ads, to build a so called remarketing list when visiting the Website. This allows an external service providers - such as Facebook, for example, - to display advertisements on various Internet Sites. Remarketing lists are not personally identifiable. The personal data of the visitor is not included, only the browser software is identified.

1. Block Cookies

If you want to customize or disable the cookie settings, you can do so from your own computer inside your browser settings. This option, depending on your browser's toolbar, can be found in cookies/ cookie tracking settings, but most usually under Tools > Settings > Privacy settings, where tracking functions can be enable/disable. Users who do not want Google Analytics to report their visit may install the Google Analytics opt-out browser ad-on. To disable Analytics web activity, find the Google Analytics opt-out page and install the plug-in for your browser. To find out more about installing and uninstalling of the extension, visit Help menu in your browser.

VI Access to data and data security measures

1. Access to and transfer of data. The personal data you provide may be accessed by the staff of the Data Controller in order to perform their duties.

The Data Controller transfers the processed personal data to its subcontractors as specified in the annex to this regulations. The Data Controller shall transfer your personal data to third-party Controllers and public bodies, unquoted in the annex, only in exceptional cases.

For example, if a case involving you is subject of legal proceedings and a court requires to provide documents containing your personal data, the police will contact the Data Controller and request the transmission of documents containing your personal data necessary for the investigation.

2. Data security measures

The Data Controller stores the personal data provided by you on its servers and, in particular cases in its paper-based archives. The Data Controller does not use the services of another company for the storage of personal data. The controller shall take relevant measures to protect personal data, inter alia against unauthorized access or unauthorized alteration. For example, the Data Controller records all cases of access to the personal data stored on its server to be always able to verify what personal data have been accessed, who accessed it and when.

VII Data Subject Rights

1. Your access rights

You, as the right holder, have access to your personal data.

If you request the Controller to provide feedback on whether or not it processes your personal data, the Controller shall provide information on:

- a. what personal data,
- b. on what legal basis,
- c. for what data processing purpose,
- d. from what source,
- e. duration of processing.

The right of yours to receive feedback on whether or not the Data Controller processes your personal data

- a. covers personal data relating to you;
- b. does not cover anonymous data;
- c. does not cover personal data not concerning you; and
- d. includes pseudonymous data that is clearly linked to you.

The Data Controller provides access to your personal data and its copy upon your request. For additional/ repeated request on copy of your personal data the Data Controller may a reasonable fee for the administrative costs of fulfilling the request, which will be borne by you.

2. Your right to rectification

You have the right to rectify your personal data. This right

- a) does not cover anonymous data;
- b) covers personal data about to you;
- c) does not cover personal data not concerning you; and
- d) includes pseudonymous data that is clearly linked to you.

The Data Controller corrects or completes your personal data accordingly upon your request. The Controller informs the recipients of the personal data (if any) about rectification of your personal data. However, the Data Controller does not inform the recipients about the rectification of personal data if it proves impossible or would require disproportionate effort.

3. Right to erasure

Under certain conditions, you have right to remove your personal data. The Data Controller shall remove your personal data without undue delay if

- a) the personal data is processed by Controller, and

- b) you request the deletion of your personal data, and
- c) the personal data are not necessary for the purposes for which the Controller processes the personal data.

The Data Controller is obliged to remove your personal data without undue delay if

- a. you personal data is processed by the Data Controller, and
- b. you request the removal of your personal data, and
- c. you withdraw your consent as basis for processing of your data, and
- d. there is no other legal basis for further processing of your data.

The Data Controller is obliged to remove your personal data without undue delay if

- a. the data processing is necessary for the purpose of the legitimate interests of the Controller or of a third party, and
- b. you object to the processing of your personal data by the Data Controller, and
- c. the legitimate reason for processing such personal data does not take precedence over your objection.

The Data Controller is obliged to remove your personal data without undue delay if

- a. you request for removal of your personal data, and
- b. the processing of such data by the Data Controller is not unlawful, or
- c. removal is compulsory under applicable law, or
- d. your data is collected for information society services.

The Data Controller informs the recipients of the personal data (if any) about the removal of your personal data. However, the Controller does not inform the recipients about the removal of personal data if informing the recipients is impossible or would require disproportionate effort.

4. Your right to restrict data processing

You may request a restriction of the processing of your personal data.

Your right to request a restriction on the processing of your personal data

- a) does not cover anonymous data;
- b) covers personal data relating to the data subject;
- c) does not cover personal data not concerning you; and
- d) includes pseudonymous information that is clearly linked to you.

The Data Controller limits the processing of your personal data for the period during which you verify the accuracy of such data upon your request for restriction of processing of your personal data and you dispute the accuracy of such data.

The Data Controller restricts the processing of your personal if your request the restriction of the processing of such data the processing of which is unlawful and you object to removal of such data.

The Data Controller restricts the processing of your personal data if

- (a) you request the restriction of the processing of your personal data, and
- (b) the Data Controller no longer needs these data for the purposes of the processing, and
- (c) you require your data to establish, enforce or defend a legal claim.

The Data Controller restricts the processing of your personal data if

- a. You object to the processing of personal data that is necessary for the purposes of the legitimate interests of the Data Controller, and
- b. you are waiting for a confirmation of that your personal data is processed by the Data Controller for a justified reason, which doesn't take precedence over your objection.

The Controller informs the recipients of the personal data (if any) about the restriction of processing of your personal data. However, the Controller does not inform the recipients about such restriction if informing the

recipients is impossible or would require disproportionate effort. If the Data Controller restricts the processing of your personal data, it still may

- a) store such personal data,
- b) process such personal data on the basis of your consent,
- c) process the personal data for submitting, enforcing or defending a legal claim or for protecting its personal rights.

5. Right to data portability

You have the right to receive your personal data you provided to the Data Controller in a structured, widely used, machine-readable format. Besides that, you have the right to request for transfer of such data to another controller avoiding any obstruction (where technically possible) of the Data Controller you provided your personal data to, in case the processing is based on consent or is necessary for contractual performance and carried out by automatically.

Your right to data portability

- a) does not cover anonymous data;
- b) covers personal data concerning you;
- c) does not cover personal data not concerning you; and
- d) does not cover clearly pseudonymised data.

6. Time limit for administration of your application as a data subject

The Data Controller shall respond to the requests for your rights under the above legislation without undue delay, but within one month at the latest.

7. Right to lodge a complaint

If you believe that your rights have been violated, the Data Controller recommends that you initiate a consultation with the Data Controller by contacting directly. If such consultation does not bring results or you do not wish to participate in such activities, you can apply to court or contact the NAIH. In case you decide to initiate legal proceedings, you may choose to bring them before court with jurisdiction over your residential address or place of residence.

The contact details of NAIH are as follows: 1125 Budapest, Szilágyi Erzsébet fasor 22/C; telephone: +36 1 391 1400; fax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu; weboldal: www.naih.hu

8. Amendments to this Notice

The Data Controller reserves the right to modify this notice at any time.

The Data Controller in the particular case shall inform customers about changes via letter or e-mail, and do it in any case in accordance with applicable law.

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