

## PRIVACY POLICY

The purpose of this data privacy notice (hereinafter the "Information Notice") is to inform the customers (hereinafter referred to as "Customers") of the Soh-O-White Ltd (registration number: 01 09 371791, tax number: 26558651242) about principles and rules applied to personal data and other data provided by visitors of the Soh-o-White webpage and processed by Soh-o-White (hereinafter: "Data Controller").

**The Data Controller processes personal data in accordance with applicable legislation, in compliance with the following principles:**

- I. Personal data may only be processed for a specific purpose in order to exercise rights and fulfil obligations. Each stage of data processing must correspond to the purpose of processing. Collection and processing of data must be fair and legitimate.
- II. Only such personal data may be processed, that is essential and suitable for realisation of the purpose of data processing. Personal data may only be processed in volumes and during a period of time definitely necessary for achievement of that purpose.
- III. Personal data retains its quality during data processing as long as the relationship with data subject is recoverable. The relationship with data subject shall be considered recoverable until the Data Controller maintains a certain technical conditions necessary for restoration.
- IV. Data processing shall ensure accuracy, completeness of data and keep it up-to-date where it is essential for the purpose of processing. Data subject shall be identifiable only until it serves the purpose of data processing.

### 1. GENERAL PROVISIONS

Name of Data Controller: Soh-O-White Ltd.

Data Controller's office: 1165 Budapest, Margit utca 114. 29, build. 1, 2-nd floor, 2.

Contact details of Data Controller: email: [info@ozonewgs.com](mailto:info@ozonewgs.com)

Postal address: 1165 Budapest, Margit utca 114. 29, build. 1, 2-nd floor.

Website: [www.owglobalsolution.hu](http://www.owglobalsolution.hu)

#### Legal basis for data processing:

- preparation of an offer, contact with customers, for complaint handling: customer's consent, if unavailable, doesn't serve a legitimate interest of the Data Controller;
- sending newsletter: customer consent.

**Scope of data processed:** Customers of the Data Controller, i.e. users who send request via [www.owglobalsolution.hu](http://www.owglobalsolution.hu) or via phone call or other means.

**Consent to data processing:** Customers explicitly agree to processing of their personal data by the Data Controller in the manner described in this Notice, when using the website/ phone contacts or attending to personal consultation.

#### Purpose of data processing:

- preparing an offer for Customers,
- relationship with Customers,
- complaint handling,
- sending newsletter.

Data processing is carried out through manual data handling.

### 2. SCOPE OF PERSONAL DATA PROCESSED:

During an entries, the Customer provides the following data for purposes of identification, contact, quotation, complaint handling:

- **name of the customer** – the person writing a message - purpose: contact, identification;
- **e-mail address** / phone number / additional contact details - purpose: contact, send information, reply letter or newsletter;
- **other**: additional personal data given by user in relation to which - purpose: contact / identification / complaint management.

**3. PERSON OF DATA PROCESSORS** (those performing technical tasks related to data processing operations)

**IN PERSON:** Tamas Vadasz

**4. DURATION OF DATA PROCESSING**

The Data Controller processes the provided data during a specific time as indicated below, or indefinitely in conformity with the principle of purpose limitation, or until the data subject's agreement is withdrawn.

Purpose of data processing	Duration of data processing
Identification	24 years from the last request
Contact	
Complaint handling	
Making offer	
Sending newsletters	12 months from the date of subscription or 12 months from the opening of the last newsletter

The Data Controller states that after expiration of the above-mentioned periods all data provided by the Customer will be removed from both digital and paper records.

**5. PROTECTION OF DATA PROCESSED**

The Data Controller stores the processed data securely in a way third parties cannot access it. Physically it is stored on electronic devices and paper format at the Data Controller's office inside closed cabinet in a closed room.

**6. TRANSFER OF DATA ABROAD**

There is no international data transfer.

**7. MANAGING COOKIES**

When you are reading this website, cookies or similar technologies can be involved to identify your browser or device. Cookie is a small file placed on your computer when you visit a website. Next time you visit it, the cookie allows the website to recognize your specific browser. Cookies may also store user settings and other data.

On other platforms - where cookies are not available or not applicable – other technologies are used to serve purpose similar to cookies, such as an ad ID on Android mobile devices. You can reset your browser settings to reject all cookies or to be notified when the system sends cookies. However, certain website features or services may not work properly without cookies. This website operates cookies used by Google Analytics governed by regulations of Google's privacy policy: [https://support.google.com/analytics/answer/6004245?hl=en\\_US](https://support.google.com/analytics/answer/6004245?hl=en_US)

## 8. DATA SUBJECT RIGHTS

The person involved into data processing may request from the Data Controller:

- a) information about the personal data processed,
- b) rectification of the personal data and
- c) erasure or blocking of the personal data, except cases of mandatory requirements on data processing.

The Data Controller shall provide all necessary information on request of the data subject about the data processed by the Controller together with an authorised data processor acting on behalf of the Controller. The information shall contain source, purpose, legal basis, duration of data processing as well as names, addresses and activities related to the data processor; in case of personal data breach incident - its circumstances, effects and countermeasures taken; if the data was transferred – the legal basis and the recipients of that data.

The Data Controller, if has an internal data protection officer, in order to control actions on data protection incidents and to keep the involved users informed, shall register the scope of personal data and number of cases involved into the incident. It shall indicate the date, circumstances and effects of the personal data breach and actions have been taken to remedy it, and any additional data specified by legal regulations on data processing.

The Data Controller is obliged to provide the information in written plain form at the data subject's request in the shortest possible time, but within 25 days from submission of the request. The information is free of charge if the applicant during the current year has not yet submitted request on the same data set. Otherwise, the Data Controller may grant reimbursement.

The Data Controller erases the personal data if:

- a) its processing is unlawful;
- b) so requested by the data subject;
- c) is incomplete or incorrect and this condition cannot be legally remedied, supposing the erasure is not excluded by law;
- d) a purpose of data processing has ceased to exist or the legal deadline for storing data specified by law has expired
- e) ordered by court or authorities.

Ratification, blocking, marking and erasure shall be notified to the data subject and to all receipts processing the previously transmitted data. The notification may be omitted if this does not harm legitimate interests of the data subject with regard to purpose of data processing. If the Data Controller fails to comply with the data subject's request on ratification, blocking or erasure, the Data Controller shall inform the data subject in writing or - if agreed - by electronic means to the data subject within 30 days of receipt of the request for ratification, blocking or erasure, indicating the legal reasoning behind the refusal. In case of refusal of the <<<< for rectification, erasure or blocking, the Data Controller shall inform the data subject of the possibility of judicial redress and appeal to Authority.

## 9. RIGHT TO OBJECT TO DATA PROCESSING.

Data subject may object to the processing of her/ his personal data,

- a) if processing or transfer of personal data is necessary only for fulfilment of legal obligations or exercise of legitimate interests of the Data Controller, a data receiver or third party, except for compulsory data processing to enforce legitimate interest of the Data Controller;
- b) where personal data is used and transferred for direct marketing, polling or scientific research; and
- c) in other cases specified by law.

The Data Controller shall examine the objection in the shortest time, but within 25 days from the submission of the request, and bring decision on its merits and inform the applicant in writing of the result.

If the data subject's objection to processing as well as further collection and transfer of his/ her data, the Data Controller shall cease and block the data and notify all receivers of the involved personal data and who are obliged to take action to enforce the right to object.

If the data subject disagrees with the decision taken by the Data Controller, or if the Data Controller fails to comply with the above deadline, the data subject may apply to a court within 30 days from the notification of the decision or the last day of the period.

If data subject objects to processing of his/her personal data or has a judicial remedy, when a third party requires a disclosure of such personal data that has no consent of the data subject, then the data scope necessary to assess the legality of the foregoing may be transferred also to legal representatives entrusted by the Data Controller.

## **10. JUDICIAL REMEDIES**

We ask Dear Customers, if you believe the Data Controller has breached your data protection rights, please contact us in order to remedy any infringement.

We also inform our Customers that in case of breach of data subject's rights the legal actions can be taken against the Data Controller. Court shall handle the case with priority. The Court shall be of competent jurisdiction to adjudge the suit. The lawsuit can be brought to a court at the place of residence of the Controller or at choice of the data subject to the place of his/ her residence. A party in the lawsuit may also be one with lack of legal capacity to sue.

If the Data Controller causes damage to someone else by unlawful handling of data or breach of the data security requirements, the Data Controller is obliged to reimburse the damage.

If the Data Controller violates the personal rights of the data subject by unlawful processing of the data or breach of the requirements of data security, the data subject may claim damages from the Data Controller.

The Data Controller shall be exempted from liability for damages and for paying damages if able to prove that the damage or the violation of personal rights of the data subject was caused by an unavoidable cause outside the scope of data processing.

No damage shall be reimbursed or compensation claimed if the damage was caused by the damaged and the breach raised from violation of personal rights – by the data subject, as a result of intentional or gross negligent conduct.

If you wish to lodge an official complaint against the Data Controller for violation of your rights, you can do so through the National Authority for Data Protection and Freedom of Information (website: [www.naih.hu](http://www.naih.hu); address: 1125 Budapest, Szilágyi Erzsébet fasor 22c.). If you have any questions, comments or issues related to processing of your personal data by the Data Controller, please contact us via the following contact details: postal address: 1165 Budapest, Margit utca 114. 29, build. 1, 2-nd floor, email: [info@ozonewgs.com](mailto:info@ozonewgs.com)

## **11. ADDITIONAL DATA PROCESSING PROVISIONS**

The Data Controller reserves the right to amend this Information Notice. This Information Notice is available at [www.owglobalsolution.com/adatvedelem](http://www.owglobalsolution.com/adatvedelem).