

# Privacy Policy

## Privacy Policy

### Data Management Information

Webshop Logisztika Limited Liability Company (hereinafter referred to as the "Data Controller"), as the operator of the website accessible under the domain [www.desirel.co.uk](http://www.desirel.co.uk) (hereinafter referred to as the "Website"), hereby publishes the rules governing the processing of data, the privacy and data processing principles, and the related information concerning the personal data of visitors to the Website and users of the services available on the Website (hereinafter collectively referred to as "Data Subjects").

In connection with data processing, the Data Controller hereby informs Data Subjects about the personal data processed on the Website, the principles and practices followed in processing personal data, and the methods and possibilities for Data Subjects to exercise their rights.

The Data Controller undertakes to ensure that all data processing related to its activities complies with the provisions of this policy and with the applicable laws.

The data protection principles related to the Data Controller's data processing activities are continuously available at the following URL: <https://www.desirel.co.uk/privacy-policy>

If the Data Subject has any questions that are not clearly answered in this statement, please send them to us at ([adatvedelem@webshoplog.hu](mailto:adatvedelem@webshoplog.hu)), and our colleague will respond.

We remind those providing data to the Data Controller that if they are submitting personal data other than their own, it is their responsibility to obtain the consent of the Data Subject.

By using the Website, the Data Subject accepts the provisions of the Privacy Policy and consents to the data processing described below.

## 1. Definitions

**a) "Data Controller":** the 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. Where the purposes and means of such processing are determined by Union or Member State law, the Data Controller or the specific criteria for its designation may be provided for by Union or Member State law.

**b) "Personal Data":** any information relating to an identified or identifiable natural person (in this document referred to as "Loyal Customer"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification 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.

**c) "Processing":** any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, or combination, restriction, erasure, or destruction.

**d) "Restriction of Processing":** the marking of stored personal data with the aim of limiting their processing in the future.

**e) "Profiling":** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, particularly to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

**f) "Processor":** a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the Data Controller.

**g) "Recipient":** a natural or legal person, public authority, agency, or other body to whom or with whom the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of such data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**h) "Consent of the Data Subject":** any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

**i) "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.

## 2. Data Controller's Information

Webshop Logisztika Korlátolt Felelősségű Társaság

**Company Name:** Webshop Logisztika Kft.

**Name of the Managing Director:** Norbert Pörzse

**Headquarters:** 1097 Budapest, Ecseri út 14-16 HUNGARY

**Company Registration Number:** 01-09-953952

**Name of the Registering Court:** Fővárosi Törvényszék, as the Company Registry Court

**Tax Number:** 23121076-2-43

**Email:** [info@desirel.com](mailto:info@desirel.com)

**Data Processing Identifier:** 03327-0001

**Data Protection Requests, Deletions:** [adatvedelem@webshoplog.hu](mailto:adatvedelem@webshoplog.hu)

**Data Management Registration Number:** NAIH-60931/2012

**Registration Number for Direct Marketing Data Processing:** NAIH-60932/2012

## 3. Legal basis, purpose, and duration of data processing

Data Subjects can provide information and data about themselves on the Website in two ways:

Personal data explicitly provided or made available during the use of the Website's services (see Section 3.1).

Information made available to the Data Controller in connection with the use of the Website, including data provided through visits to or use of the Website (see Section 3.2).

The legal basis for data processing in all cases is defined in accordance with Article 6(1) of Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation" or "GDPR"), concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC. This legal basis is indicated for each specific data processing scenario.

The Data Subject has the right to withdraw their consent to data processing, either partially or fully, and to request the deletion of their data through a written notice addressed to the Data Controller.

### **3.1. Special Categories of Data**

The Data Controller processes personal data that falls under the special categories as defined in Article 9 of the GDPR (including data relating to sexual life), given that the Data Controller operates an adult-content Webshop. As a result, the range of products available for order includes items classified as special data once ordered by the Data Subject. The Data Controller processes this personal data only with the explicit consent of the Data Subject and solely for the purposes outlined in this Privacy Policy.

### **3.2. Processed Personal Data**

#### **3.2.1 Registration, Order**

**Scope of processed data:** Surname, First name, Phone number, Email address, Billing address: Country, Postal code, City, Street, House number, Floor, Doorbell

**Duration of data processing:** The processing of personal data provided during registration and ordering begins with registration and lasts until the data subject requests deletion. If the data subject does not request the deletion of their registration, the Data Controller will delete the data from its system within 30 days after the Website ceases to exist.

**Purpose of data processing:** To ensure the availability of services offered in the Webshop that require registration (such as purchasing, participation in loyalty programs, invoicing, order delivery).

**Legal basis for data processing:** Voluntary consent of the data subject.

#### **3.2.2 Issuing an Invoice**

**Scope of processed data:** Name, Address, Tax number (if the purchaser is a company)

**Duration of data processing:** 8 years from the issuance

**Purpose of data processing:** Identifying the data subject as the buyer on the issued invoice, and displaying the required address for invoicing. If the purchaser is a company, the tax number must be included on the invoice.

**Legal basis for data processing:** Compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR, as the issuance and retention of the invoice is a legal obligation based on the Accounting Act and VAT Act.

#### **3.2.3 Fulfillment of Orders**

**Scope of processed data:** Surname, First name, Phone number, Email address, Billing address: Country, Postal code, City, Street, House number, Floor, Doorbell

**Duration of data processing:** Within the limitation period under civil law (generally 5 years, which may be extended)

**Purpose of data processing:** Fulfillment of the contract/order

**Legal basis for data processing:** Fulfillment of the contract for the delivery of the product.

#### **3.2.4 Contacting the Data Controller via Email, Electronic Message, Phone, Postal Mail**

**Scope of processed data:** Name, Email address, electronic message, and any other data voluntarily provided by the data subject during the contact process.

**Duration of data processing:** For postal and email communications: Processing of personal data begins with the voluntary provision of data and lasts until the data subject requests deletion. If the data subject does not request the deletion of personal data provided during contact, the Data Controller will store the data for 10 years (except in the case of complaint letters), after which it will be deleted from the system. If the Website ceases to exist sooner than 10 years, the data will be deleted from the system within 30 days after the Website's cessation.

The Data Controller does not record calls, and data is only collected if the data subject voluntarily provides it.

**Purpose of data processing:** Contact and communication

**Legal basis for data processing:** Voluntary consent of the data subject.

#### **3.2.5 Complaints, Warranty Processing**

**Scope of processed data:** Based on consumer protection laws, the Data Controller is required to retain data and accompanying complaint letters for 3 years following the resolution of the complaint.

**Purpose of data processing:** Investigating complaints, fulfilling obligations, and handling warranty claims.

**Legal basis for data processing:** Compliance with legal obligations under Article 6(1)(c) of the GDPR, in accordance with the requirements set out in consumer protection laws and the Civil Code.

### **3.3 Data Processing for Other Purposes**

#### **3.3.1 Desirel Club (Newsletter, Electronic Messages), Direct Marketing Activities**

**Scope of processed data:** Name, Email address, Phone number, Electronic messages

**Duration of data processing:** The Data Controller processes this data until the data subject unsubscribes from the newsletter or electronic messages by clicking the unsubscribe link in the message or newsletter, or until the data subject requests removal via email, electronic message, or postal mail. Upon unsubscription, the Data Controller will no longer contact the data subject with newsletters, electronic messages, or offers.

If the data subject subscribed to multiple types of newsletters or electronic messages on the Website, unsubscribing from one will result in unsubscribing from all messages and newsletters related to the service.

**Purpose of data processing:** Promotion of the Data Controller's products and services, sending promotional and marketing messages, direct marketing communications for business purposes.

**Legal basis for data processing:** Voluntary consent of the data subject.

#### **3.3.2 Sending Personalized Offers (Profiling)**

**Scope of processed data:** Name, Email address, Phone number, Electronic messages, Range of purchased products

**Duration of data processing:** The Data Controller processes this data until the data subject objects to profiling in writing. The data subject is entitled to object to the processing of their data for profiling purposes at any time without justification or adverse legal consequences by submitting a written statement to the Data Controller. In case of an objection, the Data Controller will no longer use the data subject's information for profiling purposes, and the data subject will retain the right to use the Website.

**Purpose of data processing:** Through profiling, the Data Controller analyzes the purchasing habits of an individual (or group of individuals) to display targeted advertisements or send personalized electronic messages or newsletters. The purpose is to send product recommendations matching their interests identified by the Data Controller based on six product categories.

**Legal basis for data processing:** Displaying or sending targeted advertising related to the Data Controller's business activities, unless otherwise stated or objected to.

#### **3.3.3 Loyalty Points System**

**Scope of processed data:** Personal data provided during registration

**Duration of data processing:** The Data Controller processes the personal data provided during registration until the data subject requests deletion. If the data subject does not request the deletion of personal data provided during the contact, the Data Controller will delete the data from its system within 30 days after the Website ceases to exist.

**Purpose of data processing:** Upon registration in the Webshop, the data subject participates in the loyalty points system, which provides exclusive benefits. After each purchase, the data subject receives 1 loyalty point for every 0,05 EUR spent. The purpose of the loyalty system is to reward the data subject.

**Legal basis for data processing:** Voluntary consent of the data subject.

#### **3.3.4 Promotions**

**Scope of processed data:** Name, Email address, Phone number, Electronic messages

**Duration of data processing:** The Data Controller processes this data until the data subject unsubscribes (participation in the promotion requires subscription to the newsletter and electronic messages) by clicking the unsubscribe link in the newsletter or electronic message, or until the data subject requests removal via email, electronic message, or postal mail.

Upon unsubscribing, the Data Controller will no longer contact the data subject with newsletters, electronic messages, or offers.

**Purpose of data processing:** Participation in the guaranteed gift promotion announced on the Website (e.g., "spin the wheel"), and sending newsletters and electronic messages, which are required for participation in the promotion.

**Legal basis for data processing:** Voluntary consent of the data subject.

### 3.3.5 Prize draw

**Scope of processed data:** Name, Email address, Phone number, Electronic messages

**Duration of data processing:** Until the end of the game, and for the winners, personal data will be stored for 8 years.

**Purpose of data processing:** Conducting the game.

**Legal basis for data processing:** Voluntary consent of the data subject.

### 3.3.6 Comparison Shopping Systems Overview:

For the best customer service, the Data Controller operates a quality assurance system based on independent customer feedback. To this end, after purchases made on the Website, customers may be invited to provide independent reviews. In this regard, the data subject's email address and the name of the purchased product will be forwarded to the operator of the independent system, which, on behalf of the Data Controller, will conduct an evaluation of the Website through a questionnaire sent to the data subject. Customer reviews provide an authentic picture of the quality of the shops, as the "Trusted Shop" title can only be earned based on feedback from users who have actually purchased from the webshop.

By submitting an order, the data subject consents to the transfer of data for this purpose.

The personal data transferred to **Online Comparison Shopping Kft.** will not be used for their own purposes but solely for the purpose outlined here, and it may not be processed for other purposes.

**Scope of transferred data:** The data subject's email address, name of purchased product.

When placing an order, your personal data, such as your name, email address, phone number, and shipping/billing details, will be recorded. The Data Controller is **DATACONTROLLER**. The data processing is carried out in accordance with the General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council, hereinafter: GDPR). The legal basis for data processing is, on the one hand, the performance of contractual obligations and, in connection with invoicing, compliance with legal obligations (pursuant to Article 6(1)(b) and (c) of the GDPR). The collected data will be processed for the general limitation period, which is 5 years, while billing data (name, address) will be retained for 8 years. The deletion of personal data processed in this manner is possible under Article 17(1)(a) of the GDPR if it is no longer necessary for the purposes for which it was collected. You can request data deletion through our contact information.

The Data Controller will not use or process the personal data defined in sections 3.1-3.2 for purposes other than those specified above. The release of personal data to third parties or authorities will only take place with the prior, explicit consent of the data subject, unless otherwise provided by mandatory law.

In any case where the Data Controller intends to use the provided data for purposes other than the original data collection purpose, the data subject will be informed, and their prior, explicit consent will be obtained, or they will be given the opportunity to prohibit the use.

For data processing not listed in this notice, we will provide information at the time of data collection.

The Data Controller will process personal data for the duration of the existence of the data processing purpose, primarily for the duration of the legal relationship with the data subject (at the end of which the data subject's provided data will be deleted), or until the data subject requests deletion or withdraws consent.

## 3.4. Data Collected in Connection with the Use of the Website (Other Data Processing Purposes)

### 3.4.1. Technical Data, Website Visit Data

The Data Controller does not associate data from log files with any other information and does not attempt to identify the data subject.

An IP address is a series of numbers that uniquely identifies a user's computer when they connect to the internet. With the help of IP addresses, the geographical location of the computer used by the visitor can be determined. The addresses of the visited pages, along with the date and time, are not sufficient on their own to identify the data subject, but when combined with other data (such as information provided during registration), they may be suitable for drawing conclusions about the data subject.

**Scope of processed data:** Date, time, the IP address of the data subject's computer, the address of the visited page, data regarding the visitor's age.

**Purpose of data processing:** The Data Controller's system automatically records the IP address of the data subject's computer, the start time of the visit, and in certain cases (depending on the settings of the computer) the type of browser and operating system. The recorded data cannot be linked to any other personal data. The processing of the data serves only statistical purposes.

The purpose of data processing is to monitor the operation of the service, ensure personalized service, and prevent misuse.

**Duration of data processing:** 30 days from the date of the website visit.

The website uses the [AdForm RTB solution](#).

### 3.4.2. Cookie Management

To provide personalized service, the Data Controller places small data packets, known as cookies, on the data subject's computer and retrieves them during subsequent visits. If the browser returns a previously saved cookie, the service provider managing the cookie can connect the data subject's current visit to previous ones, but only in relation to its own content. Common cookies used in webshops include "session cookies protected by passwords" and security cookies.

- **Temporary (session) cookies:**

**Purpose of data processing:** These cookies ensure the more efficient and secure operation of the Website and are essential for certain functions or applications to work properly on the Website.

**Duration of data processing:** They are active during the website visit and are automatically deleted afterward.

- **Persistent cookies:**

**Purpose of data processing:** The Data Controller also uses persistent cookies to provide a better user experience (e.g., optimized navigation). These cookies are stored in the browser's cookie file for a longer period. The duration depends on the settings applied by the data subject in their internet browser.

**Duration of data processing:** These cookies are stored for 1-5 days in the browser's cookie file.

### Types of cookies:

- Cookies used for shopping cart functions,
- Security cookies,
- Cookies required for password-protected sessions,
- Customer satisfaction measurement cookies: NPS\_3500f360\_last\_seen, NPS\_3500f360\_surveyed,
- Barion Pixel Full Version (The Barion Pixel is a JavaScript-based tracking code embedded in the Merchant's website, similar to Google Analytics and Facebook Pixel, which tracks the activity of website visitors. The Barion Pixel embedded in the website

collects data about visitors, such as which products they viewed, what they clicked on, searched for, added to their cart, or purchased. The data is transmitted to Barion's servers, and Webshop Logisztika Kft. does not collect, store, or process this data. The purpose of Barion's data collection is fraud prevention and marketing data collection. Learn more at [Barion's website](#)).

- **Barion One-Click Payment (Saved Card Data)**

The Barion system offers customers the option to use "One-Click" payment, where credit card data is securely stored in a tokenized form. The advantage of this feature is that future purchases can be completed faster without re-entering card details. Saved card data can be deleted at any time by the customer through their account in the UNAS system or via the Barion platform. The payment service is provided by Barion Payment zrt., a financial institution licensed by the Central Bank of Hungary.

**Scope of processed data:** No personal data is collected.

**Data subjects:** All visitors to the website.

**Purpose of data processing:** To distinguish between different data subjects, identify the current session of the data subject, store the data provided during the session, prevent data loss, manage the shopping cart (virtuemart), and ensure proper navigation.

**Duration of data processing:** For session cookies, data processing lasts until the end of the website visit. In other cases, it lasts up to 30 days. For age verification questions, the duration is 2 calendar days.

### **3.4.3. Data Processing by External Service Providers**

The portal's HTML code contains links to and from servers independent of the Data Controller. The server of the external service provider communicates directly with the data subject's computer. We inform visitors that these external service providers, due to the direct connection between their servers and the data subject's browser, are capable of collecting user data.

The external service provider's server delivers personalized content to the data subject, if applicable.

For further information about the data processed by the servers of external providers, please refer to the following data processors.

When visiting the Website, the data subject's computer downloads the logo containing the gif image from the server of shopmania.hu, enabling the server to collect data from the data subject's computer as described above.

External service providers place small data packets, known as cookies, on the data subject's computer and read them later to ensure personalized service. If the browser sends back a previously saved cookie, the service providers can link the data subject's current visit to previous ones but only concerning their own content.

The Data Controller's advertisements may appear on websites operated by external service providers (Google, Facebook). These external service providers use cookies to store the fact that the data subject has previously visited the Data Controller's Website, and based on this information, they display personalized ads to the data subject (i.e., they engage in remarketing activities).

### **3.4.4. Cookies Placed by Google Analytics**

The independent measurement and audit of the Website's traffic and other web analytics data are assisted by the servers of Google Analytics as an external service provider. Detailed information about the handling of measurement data can be found at <https://www.google-analytics.com>.

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google Analytics uses cookies stored on the data subject's computer to help analyze user interactions on the Website. The legal basis for data processing for web analytics purposes is the voluntary consent of the user of the Website. The analytical cookies are anonymized and aggregated, meaning the identification of the computer is difficult, but not impossible.

The analytical information collected by Google Analytics cookies is transmitted to and stored on Google's servers. This information is processed by Google on behalf of the Data Controller to evaluate users' browsing habits, generate reports on Website usage, and provide other services related to Website use. The use of Google Analytics includes IP anonymization and does not use UserID to prevent the storage of personal data during sessions.

More information on cookies used by Google can be found at: <https://policies.google.com/technologies/ads>.

Google's Privacy Policy can be accessed at: <https://policies.google.com/privacy?hl=en>.

**Scope of processed data:** IP address. Analytical cookies are anonymized and aggregated data, which cannot be used to identify the data subject.

**Duration of data processing:** 26 months.

**Google Analytics cookies:** \_utma, \_utmb, \_utmc, \_utmz, \_utmv.

**Service Provider:**

Google Ireland Limited

A company registered in Ireland and governed by Irish law  
(Registration number: 368047 / VAT number: IE6388047V)  
Gordon House, Barrow Street, Dublin 4, Ireland.

### **3.4.5. Google Adwords**

The Website uses Google Adwords tracking codes. These are used to display remarketing ads on websites within the Google Display Network to visitors of the Website. The remarketing code uses cookies to tag visitors. Website users can disable these cookies by visiting the Google Ads settings manager and following the provided instructions. After this, personalized offers from the Data Controller will no longer appear.

**Scope of processed data:** Purchase value (if the data subject made a purchase), the fact and time of visiting specific subpages.

**Duration of data processing:** Until the next purchase.

**Google Analytics and Google Adwords**

Cookies: \_ga, \_gat, \_gid.

**Service Provider:**

Google Ireland Limited

A company registered in Ireland and governed by Irish law  
(Registration number: 368047 / VAT number: IE6388047V)  
Gordon House, Barrow Street, Dublin 4, Ireland.

### **3.4.6. Maileon – Newsletter Service**

Maileon is operated by the German-based XQueue GmbH, which holds ISO 27001 certification, is a member of the CSA (Certified Sender Alliance), and complies with GDPR regulations.

**Service provider:** XQueue GmbH

**Headquarters and postal address:** Christian-Pleß-Str. 11-13, 63069 Offenbach am Main

**Website:** <https://maileon.com/>

**Activity:** Newsletter service

**Privacy Statement:** <https://maileon.com/privacy-policy/>

### **3.4.7 Molin chat platform**

This website uses the Molin chat platform, which connects users with Desirel.com customer service. We collect email addresses/names/phone numbers only with the consent of users. The exchanged messages and data are stored by the Molin application.

We have integrated Molin, our advanced AI customer service assistant, to better understand the needs of our users and provide optimal service. Molin uses the latest technology to analyze user interactions, preferences, and feedback, enabling us to continuously improve our service. Its functions include the use of cookies and other technologies that collect data, such as IP address, screen size, browser information, and country-level geographical location. These data are securely stored in a pseudonymized profile, and Molin AI strictly adheres to contractual obligations. Our goal is to deliver excellent customer service while safeguarding your data.

**Processed Data:** Data provided by the user during the contact process.

**Data Retention Period:** The data will be processed only until the contact process is concluded.

**Legal Basis for Data Processing:** User's consent.

**Service Provider:**

Headquarters: 48 Overton Road, London, SE2 9SD, United Kingdom

Mailing Address: 48 Overton Road, London, SE2 9SD, United Kingdom

Email: [hey@molin.ai](mailto:hey@molin.ai)

Website: <https://molin.ai/>

### 3.4.8 Dognet Affiliate Network

Dognet is an affiliate network that provides opportunities for advertisers and partners offering advertising platforms to display their services.

It is used to identify the source of visits originating from the Dognet system, based on which conversions can be recorded during a purchase.

Dognet does not process personal data.

**Cookie Lifetime:** 30 days from the last visit.

**Cookie Name:** PAPVisitorId

**Service Provider:**

Lead Media s.r.o.

811 05 Lead Media s.r.o., Karpatská 6, Bratislava, Slovakia

Email Address: [info@edognet.hu](mailto:info@edognet.hu)

### 3.4.9 Barion Online Payment System

**Service Provider:**

Barion Payment Inc.

Address: 1117 Budapest, Irinyi József utca 4-20, 2nd floor

Data Protection Policy: <https://www.barion.com/en/privacy-notice>

Cookie Policy: <https://www.barion.com/en/cookie-policy>

**Cookie Name:**

**ba\_vid**

Purpose: Detecting bank card fraud based on the digital fingerprint of the device you use and your browsing habits. This cookie is essential for identifying fraudulent users. It ensures that the data derived from your browsing habits is recognized as coming from the same user. This cookie is placed on both our website and the websites of merchants using the Barion Smart Gateway.

**ba\_vid.xxx**

Purpose: Detecting bank card fraud based on the digital fingerprint of the device you use and your browsing habits. This cookie ensures the tracking of your browsing habits across sessions on the same website. Data collected includes: ba\_vid, user-related ID (hash generated from browser properties), timestamps of your first, current, and last visit on the website, current session ID, and third-party cookie permissions. This cookie is placed on both our website and the websites of merchants using the Barion Smart Gateway.

### 3.4.10 BIP SMS

BIP SMS is an electronic messaging service. BIP SMS exclusively uses the phone number, and no additional data is processed. No cookies are used on the website.

**Service Provider:**

Bip Communications Ltd.

Address: 1134 Budapest, Bulcsú utca 23, Hungary

BIP SMS complies with GDPR regulations. The privacy policies regarding the use of BIP SMS can be found at the following links:

[https://sms.bipkampany.hu/en/contents/antispam\\_policy](https://sms.bipkampany.hu/en/contents/antispam_policy)

<https://sms.bipkampany.hu/en/contents/termsofservice>

Contact:

Bip Communications Ltd.

1134 Budapest, Bulcsú utca 23, Hungary

Email: [info@bipkampany.hu](mailto:info@bipkampany.hu)

### 3.4.11 Meta (Facebook, Instagram)

**Service Provider:**

Company Name: Meta Platforms, Inc.

Headquarters: 1601 Willow Road, Menlo Park, CA 94025, USA

Email: No public customer service email available

**Activities:** Meta Platforms, Inc. operates the Facebook and Instagram platforms, allowing users to engage in social media, communication, and content sharing.

**Data Processing and Transfer:** The personal data of users, including profile data, posts, messages, and interactions generated while using the platforms, may be processed in accordance with Meta's privacy policy.

**Location of Data Processing:** Data processing may occur in the United States and other countries, but Meta ensures the protection of data in compliance with the General Data Protection Regulation (GDPR).

**Third-Party Involvement:** Meta may share data with third parties, including partners and advertisers, but only with the user's consent or due to legal obligations.

**Use of Cookies:** Meta platforms use cookies to enhance the user experience. Users can manage cookie settings through their browsers. Meta's privacy policies can be accessed at the following links: [Privacy Policy](#) and [Terms of Service](#).

### 3.4.12 TikTok

**Service Provider:**

Company Name: TikTok Inc.

Headquarters: 5800 Bristol Parkway, Culver City, CA 90230, USA  
Email: [privacy@tiktok.com](mailto:privacy@tiktok.com)

**Activities:** TikTok is a video-sharing social media platform that allows users to create, share, and interact with short videos and other users.

**Data Processing and Transfer:** User personal data, including profile information, content, messages, and interactions on the platform, may be processed in accordance with TikTok's privacy policy.

**Location of Data Processing:** Data processing may occur in the United States and other countries, but TikTok ensures data protection in compliance with the GDPR.

**Third-Party Involvement:** TikTok may share data with third parties, including partners and advertisers, with the user's consent or due to legal obligations.

**Use of Cookies:** TikTok uses cookies to optimize its services. Users can manage cookie settings in their browser. TikTok's privacy policies can be accessed at the following link: [Privacy Policy](#).

### 3.4.13 Linktree

**Service Provider:**

Company Name: Linktree Pty Ltd  
Headquarters: 37 Islington St, Collingwood VIC 3066, Australia  
Email: [support@linktr.ee](mailto:support@linktr.ee)

**Activities:** Linktree is a platform that allows users to share multiple links, content, and social media profiles through a single link.

**Data Processing and Transfer:** Data provided by users, including links, content, and statistical data, is processed according to Linktree's privacy policy.

**Location of Data Processing:** Data processing may occur in Australia and other countries, with data protection ensured in compliance with the GDPR.

**Third-Party Involvement:** Linktree may share data with third parties, such as analytics or advertising partners, with the user's consent or due to legal obligations.

**Use of Cookies:** The platform uses cookies to enhance services, which users can manage via browser settings. Linktree's privacy policies can be accessed at the following link: [Privacy Policy](#).

### 3.4.14 Trustindex

**Service:** Trustindex is an online tool that allows businesses to display various user reviews and ratings on their website from different sources, such as Google, Facebook, TripAdvisor, etc. Its purpose is to enhance website visitors' trust by showcasing authentic and reliable user feedback.

**Scope of Data Processed:** Name, email address

**Data Retention Period:** Until withdrawal of consent

**Cookies:** `_ga`, `_fbp`, `_ga_DGL6KLFTVT`

**Service Provider:**

Trustindex Ltd  
Address: 2724 Ujlengyel, Nyári Pal Street 15, Hungary  
Established: 2018  
Hungarian VAT ID: 26281186-2-13  
EU VAT ID: HU26281186  
Registration number: 13 09 223096  
Email: [info@trustindex.io](mailto:info@trustindex.io)  
Website: <https://www.trustindex.io/>

The Trustindex privacy policy can be accessed at the following link: [Privacy Policy](#).

## 3.5. Deletion of Cookies

The data subject has the right to delete cookies from their computer or to disable the use of cookies in their browser. Cookies are generally managed in the Tools/Settings menu of browsers under the Privacy/History/Custom Settings options, often listed as cookie, cookie management, or tracking.

The Website may contain information, particularly advertisements, from third parties or advertising service providers who are not affiliated with the Data Controller. It is possible that these third parties may also place cookies, web beacons, or use similar technologies on the data subject's computer to collect data and send targeted advertisements related to their services. In such cases, the data processing is governed by the data protection regulations of these third parties, and the Data Controller assumes no responsibility for such data processing activities.

## 4. Data Processing

The data controller entrusts the following organizations with the processing of personal data collected, in accordance with Article 28 of the GDPR, for the following purposes:

### 4.1 Tharanis Ügyvitel Kft.

Address: 2724 Ujlengyel, Nyári Pál utca 15.  
Email: [info@tharanisugyvitel.hu](mailto:info@tharanisugyvitel.hu)  
Web: <https://www.tharanisugyvitel.hu>

Activity: Billing, courier data processing, NAV (tax authority) reporting

### 4.2 MediaCenter Hungary Kft.

Address: 6000 Kecskemét, Sosztakovics u. 3. II/6.  
Postal Address: 6001 Kecskemét, Pf. 588  
Phone: +36 76 575 023  
Web: <https://www.mediacenter.hu>

Activity: Domain and email services

### 4.3 UNAS Online Kft.

Address: 9400 Sopron, Kőszegi út 14.  
Email: [unas@unas.hu](mailto:unas@unas.hu)  
Activity: Online store systems provider, hosting provider

### 4.4 Barion Payment Zrt.

Address: 1117 Budapest, Irinyi József utca 4-20. 2nd floor  
Email: [info@barion.hu](mailto:info@barion.hu)  
Web: <https://www.barion.hu>

Activity: Online payment processing system provider

#### **4.5 OTP Mobil Kft.**

Address: 1138 Budapest, Váci út 135-139, Building B, 5th floor

Email: [info@otpmobil.com](mailto:info@otpmobil.com)

Web: <https://www.otpmobil.hu>

Activity: Online payment processing system provider

#### **4.6 REISSWOLF Budapest Adat- és Dokumentumkezelő Kft.**

Address: 1097 Budapest, Illatos út 6.

Phone: +36-1-219-5670

Email: [info@reisswolf.hu](mailto:info@reisswolf.hu)

Activity: Secure destruction of confidential documents and other data carriers, providing closed-system security services

#### **4.7 Lead Media s.r.o. (Dognet)**

Address: 811 05 Bratislava, Karpatská 6, Slovakia

Phone: +421 948 483 365

Email: [info@edognet.hu](mailto:info@edognet.hu)

Web: <https://www.dognet.hu>

Activity: Marketing software

#### **4.8 Bip Communications Kft. (SMS Sending System)**

Address: 1134 Budapest, Bulcsú utca 23.

Email: [info@bipkampany.hu](mailto:info@bipkampany.hu)

Web: [https://sms.bipkampany.hu/hu/contents/antispam\\_policy](https://sms.bipkampany.hu/hu/contents/antispam_policy)

Activity: SMS sending system

#### **4.9 Molin AI Ltd.**

Address: 48 Overton Road, London, SE2 9SD, United Kingdom

Postal Address: 48 Overton Road, London, SE2 9SD, United Kingdom

Email: [hey@molin.ai](mailto:hey@molin.ai)

Web: <https://molin.ai/>

Activity: Automated AI-powered chat service (no cookies used)

#### **4.10 Clarity - Microsoft Corporation**

Address: 1 Microsoft Way, Redmond, WA 98052, US

Web: <https://clarity.microsoft.com/>

Activity: Website analytics

#### **4.11 Meta Platforms, Inc.**

Address: Meta Platforms, Inc., 1601 Willow Road, Menlo Park, CA 94025, USA

Contact: <https://www.meta.com/help/quest/>

Web: <https://www.meta.com/>

Activity: Paid advertising services via Meta platforms (Facebook, Instagram), with the aim of encouraging newsletter sign-ups through ads.

Data Processing Purpose: Data is processed to encourage users to subscribe to our newsletter via Facebook ads. Users can voluntarily provide their data (first name, email) for the purpose of subscribing to the newsletter. The collected data is used exclusively for sending newsletters to subscribed users.

The Data Controller reserves the right to engage additional data processors in the future, in which case the Data Subjects will be informed through amendments to this Privacy Policy.

#### **4.12 GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.**

Address: 2351 Alsónémedi, Európa u. 2.

Email: [info@glshungary.com](mailto:info@glshungary.com)

Website: <https://www.gls-group.eu>

Activity: Courier service, home delivery of orders, package collection, package returns.

#### **4.13 Packeta Hungary Kft.**

Address: 1044 Budapest, Ezred utca 2. B2/11.

Email: [info@packeta.hu](mailto:info@packeta.hu) Activity: Courier service, home delivery of orders, package collection, package returns.

#### **4.14 DPD Hungary Kft.**

Address: Hungary, 1134 Budapest, Váci út 33., A II.

Email: [dpd@dpd.hu](mailto:dpd@dpd.hu)

Website: <https://www.dpd.com>

Activity: Courier service, home delivery of orders, package collection, package returns.

#### **4.15 Global Payments Inc**

Headquarters: 3550 Lenox Road, Atlanta, GA 30326, United Sta

Email: [media.relations@globalpay.com](mailto:media.relations@globalpay.com)

Activity: Providing online credit card acceptance system

#### **4.16. VIVABANK SINGLE MEMBER BANKING S.A. (VIVABANK S.A.), a Viva Wallet Group**

Address: 18-20 AMAROUSIOU-CHALANDRIOU AVE, MAROUSI

Email: [support@viva.com](mailto:support@viva.com)

Activity: providing an online credit card acceptance system

Data protection: <https://www.viva.com/en-hu/privacy-notice>

#### **4.17. Cash on Delivery Inspector – Utánvét Ellenőr Kft.**

Registered office: 8640 Fonyód, Szigligeti Street 10, Hungary

Postal address: 8640 Fonyód, Szigligeti Street 10, Hungary

Website: [utanvet-ellenor.hu](http://utanvet-ellenor.hu)

Email: [hello@utanvet-ellenor.hu](mailto:hello@utanvet-ellenor.hu)

Phone: +36 20 923 8883

Activity: Buyer reputation verification

#### **4.18. SupportBox s.r.o.**

Company name: SupportBox s.r.o.

Registered office: V Celnici 1031/4, Nové Město, 110 00 Prague 1, Czech Republic

Company ID (IČO): 04308697

VAT ID (DIČ): CZ04308697

Email: [info@supportbox.cz](mailto:info@supportbox.cz)

Website: <https://www.supportbox.cz>

Activity: Provision of customer support and chat system services

#### **4.19. Retino.cz s.r.o.**

Company name: Retino.cz s.r.o.

Registered office: Václavské náměstí 846/1, Nové Město, 110 00 Prague 1, Czech Republic

Company ID (IČO): 08913040

VAT ID (DIČ): CZ08913040

Email: [hello@retino.cz](mailto:hello@retino.cz)

Website: <https://www.retino.cz>

Activity: Provision of return and complaint management system

The Data Controller reserves the right to engage additional data processors in the future. Any such changes will be communicated to the Data Subjects by updating this Privacy Policy.

## **5. Data Transfer**

The Data Controller will only transfer personal data that can identify the Data Subject to third parties with the express consent of the Data Subject, unless otherwise required by law.

## **6. Access to Data and Data Security Measures, Data Transfer**

### **Access to Data and Data Transfer**

The employees of the Data Controller may access personal data in order to fulfill their responsibilities. The Data Controller will only disclose personal data to other organizations or public authorities as required by law or regulation.

The Data Controller informs the Data Subject that the court, prosecutor, investigative authority, administrative authority, the National Authority for Data Protection and Freedom of Information, or other authorized bodies may request information, data disclosure, or the provision of documents from the Data Controller.

The Data Controller will only disclose personal data to the authorities in the quantity and scope necessary to fulfill the purpose of the request, as specified by the requesting authority.

## **7. Rights of the Data Subject**

### **7.1. Right to Information and Access to Personal Data**

The Data Subject has the right to request and receive information regarding the personal data stored by the Data Controller, and to verify what data the Data Controller holds about them. The Data Subject can request access to their personal data by submitting a written request (via email or postal mail) to the Data Controller. The information will be provided in a widely-used electronic format. Verbal information will not be provided over the phone.

The right of access includes information on:

- The scope of the processed data (e.g., name, billing name, billing address, email address, phone number, depending on the service used).
- The purpose, duration, and legal basis for the processing of the data.
- The recipients to whom the data has been or will be transferred.
- The source of the data.

The Data Controller will provide the first copy of the personal data (in paper or electronic format) to the Data Subject free of charge. For any additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs.

The Data Subject may request corrections, supplements, deletions, or limitations to the processing of their personal data, as outlined in section 6, or initiate proceedings as described in section 7.

### **7.2. Right to Rectification**

At the request of the Data Subject, the Data Controller will correct inaccurate personal data or complete any incomplete personal data without undue delay, based on the information provided by the Data Subject. The Data Controller will notify all recipients with whom the personal data has been shared, unless this proves impossible or requires disproportionate effort. The Data Subject will be informed of these recipients upon written request.

### **7.3. Right to Restrict Data Processing**

The Data Subject has the right to request the restriction of data processing if:

- The accuracy of the personal data is disputed by the Data Subject (in this case, the restriction will apply for the time necessary for the Data Controller to verify the accuracy).
- The processing is unlawful, and the Data Subject opposes deletion and requests the restriction of use instead.
- The Data Controller no longer needs the personal data for processing purposes, but the Data Subject requires them for legal claims.
- The Data Subject has objected to the processing, pending verification whether the Data Controller's legitimate grounds override those of the Data Subject.

The Data Controller will notify the Data Subject before lifting any restriction on data processing.

### **7.4. Right to Erasure ("Right to be Forgotten")**

The Data Subject can request the deletion of personal data without undue delay if one of the following conditions applies:

- i) The data is no longer necessary for the purposes for which it was collected.
- ii) The Data Subject withdraws consent, and there is no other legal ground for processing.
- iii) The Data Subject objects to the processing, and there are no overriding legitimate grounds.
- iv) The data has been unlawfully processed.
- v) The data must be erased to comply with a legal obligation.
- vi) The data was collected in relation to the offer of information society services to children.

The right to erasure does not apply where processing is necessary for the exercise of freedom of expression, public health, or legal claims.

### **7.5. Right to Data Portability**

The Data Subject has the right to receive the personal data they provided to the Data Controller in a structured, commonly used, and machine-readable format, and to transmit those data to another controller. This right applies only to personal data provided by the Data Subject.

The Data Controller will fulfill data portability requests only via email or written postal requests. The Data Controller must verify the identity of the Data Subject making the request. This right does not automatically delete the data from the Data Controller's system.

### **7.6. Right to Object to Data Processing**

The Data Subject can object to the processing of their personal data, including profiling, at any time based on their particular

situation. The Data Subject can also object to data processing for direct marketing purposes.

Objections can be submitted in writing (via email or postal mail) or by clicking the unsubscribe link in newsletters or electronic messages.

### 7.7. Rights of Deceased Data Subjects

Within five years after a Data Subject's death, the rights to access, rectification, deletion, restriction of processing, portability, and objection can be exercised by an authorized person designated by the deceased in a notarized statement. If no such statement exists, these rights can be exercised by the closest relative of the deceased.

A close relative must provide proof of death and their identity, and their relationship to the deceased.

### 7.8. Deadline for Fulfilling Requests

The Data Controller will respond to requests within one month of receipt, with the possibility of extending this period by two additional months if necessary. The Data Subject will be informed of any delay within one month of receiving the request.

### 7.9. Right to Compensation

Any person who has suffered material or non-material damage as a result of a breach of the GDPR is entitled to receive compensation from the Data Controller or the Data Processor. The Data Controller will be exempt from liability if it proves that it is not responsible for the event that caused the damage.

## 8. Enforcement of Rights

The Data Subject can exercise their rights by submitting a request via email or postal mail. It is not possible to exercise any rights via telephone.

The Data Subject can exercise their rights through the following contact details:

**Name:** Webshop Logisztika Kft.

**Postal Address:** 1097 Budapest, Ecseri út 14-16.

**Email Address:** adatvedelem@webshoplog.hu

The Data Subject cannot enforce their rights if the Data Controller proves that they are not in a position to identify the Data Subject. If a request by the Data Subject is manifestly unfounded or excessive (especially due to its repetitive nature), the Data Controller may charge a reasonable fee for fulfilling the request or refuse to act on the request. The burden of proving the manifestly unfounded or excessive nature of the request lies with the Data Controller. If the Data Controller has doubts about the identity of the person submitting the request, they may request additional information necessary to confirm the identity of the requester.

If the Data Subject disagrees with the decision of the Data Controller, they may seek recourse under the **Act CXII of 2011 on Information Self-Determination and Freedom of Information (Info Act)**, the **GDPR**, or the **Civil Code of Hungary (Act V of 2013)** by contacting:

**National Authority for Data Protection and Freedom of Information (NAIH)**

Website: <https://www.naih.hu>

**Address:** 1055 Budapest, Falk Miksa utca 9-11.

**Postal Address:** 1363 Budapest, Pf.: 9.

**Phone:** +36 (1) 391-1400

Alternatively, the Data Subject may assert their rights through the court.

## 9. Data Breach Management

A data breach refers to any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data that is transmitted, stored, or otherwise processed. The Data Controller maintains a record of data breaches for the purpose of monitoring corrective measures, notifying the supervisory authority, and informing the Data Subject. This record includes the categories of personal data affected, the number of individuals concerned, the date and circumstances of the breach, its effects, and the measures taken to mitigate it. If the Data Controller determines that a breach poses a high risk to the rights and freedoms of Data Subjects, they will inform both the Data Subject and the supervisory authority without undue delay, and in any case, within 72 hours of becoming aware of the breach.

## 10. Disclosure of Data to Authorities

The Data Controller may be approached by a court, prosecutor, investigative authority, misdemeanour authority, administrative authority, the National Authority for Data Protection and Freedom of Information, or other organizations authorized by law to request the disclosure of personal data, the sharing of information, or the provision of documents.

The Data Controller will only release personal data to authorities in the amount and to the extent that is absolutely necessary to achieve the purpose of the request, provided that the authority specifies the exact purpose and the scope of the data required.

## 11. Links

The Data Controller is not responsible for the content, data, or information protection practices of external websites that may be accessed via links from the Website. If the Data Controller becomes aware that the linked site or link violates the rights of third parties or the applicable laws, they will promptly remove the link from the Website.

## 12. Storage of Personal Data, Data Security Measures

The Data Controller commits to ensuring the security of personal data and takes technical and organizational measures to protect the data from destruction, unauthorized use, and alteration. The Data Controller also undertakes to ensure that any third parties to whom data are transferred or disclosed based on the Data Subject's consent comply with data security requirements.

The Data Controller takes all necessary precautions to prevent accidental damage or destruction of the data. The Data Controller imposes the same obligation on its employees involved in data processing.

The IT systems and other data storage locations of the Data Controller are located at its headquarters, business premises, its data processors, **UNAS Online Kft.** (9400 Sopron, Kőszegi út 14.), and **MediaCenter Hungary Kft.** (6000 Kecskemét, Sostakovics u. 3. II/6.), including the server room at 1132 Budapest, Victor Hugo u. 18-22.

The Data Controller selects and operates IT tools used for data processing in a manner that ensures that the processed data:

1. are accessible to authorized persons (availability);
- b. are authentic and verifiable (data processing authenticity);
- c. remain unchanged (data integrity);
- d. are protected against unauthorized access (data confidentiality).

The Data Controller protects the data from unauthorized access, alteration, transmission, disclosure, deletion, destruction, accidental destruction, damage, and inaccessibility resulting from changes in the technology used.

The Data Controller uses appropriate technical solutions to ensure that the electronically managed data in its various records cannot be directly linked to the Data Subject unless permitted by law.

Considering the state of the art, the Data Controller applies technical, organizational, and operational measures to ensure an adequate level of protection corresponding to the risks associated with data processing.

The Data Controller ensures:

1. a) **Confidentiality**: It protects the information to ensure that only authorized persons have access to it;
- b) **Integrity**: It ensures the accuracy and completeness of the information and the method of processing;
- c) **Availability**: It ensures that authorized users can access the required information and that the tools for accessing it are available when needed.

The IT system and network of the Data Controller and its partners are protected against computer fraud, espionage, sabotage, vandalism, fire, flood, viruses, hacking, and denial-of-service attacks. The Data Controller ensures the security of its systems through server-level and application-level security measures.

We inform the Data Subjects that electronic messages transmitted over the internet, regardless of protocol (email, web, FTP, etc.), are vulnerable to network threats that may lead to dishonest activities, disputes, or the disclosure or alteration of information. To protect against such threats, the Data Controller takes all reasonable precautions. The systems are monitored to detect any security breaches and provide evidence of any security incidents. System monitoring also enables the effectiveness of the applied precautions to be checked.

## 13. Other Provisions

The Data Controller reserves the right to unilaterally amend this Privacy Policy with prior notice to the Data Subjects through the Desirel Website. After the amendment takes effect, the Data Subject implicitly accepts the amended Privacy Policy by continuing to use the Website or services, except in cases of objection.

Complaints regarding data processing can be submitted to the **National Authority for Data Protection and Freedom of Information (NAIH)**:

- **In person**: NAIH Customer Service, 1055 Budapest, Falk Miksa utca 9-11.
- **By mail**: NAIH, 1363 Budapest, Pf.: 9.
- **By email**: [kozerdekubejelentesek@naih.hu](mailto:kozerdekubejelentesek@naih.hu)
- **Other contact details**: +36 (1) 391-1400, Fax: +36 (1) 391-1410, Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), Website: <https://www.naih.hu>

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