

Privacy Statement

Effective: from 28.10.2022 until revoked

Pepita Group Zrt.

The Pepita Group Zrt. (hereinafter referred to as: Service Provider, Data Controller) is committed to protecting the personal data provided by visitors. The Service Provider, as the data controller, hereby informs the visitors of <https://pepita.com> and its associated pages (hereinafter referred to as the Website, Pepita.com) about the personal data processed in connection with the operation of the Website and its services, the identity and data of the data controller(s), the principles and practices followed in the processing of personal data, the transfer of data, the organizational and technical measures taken to protect personal data, as well as the ways and means of exercising the rights of the data subjects. This privacy notice (hereinafter referred to as the "Notice") forms part of the general terms and conditions applicable to users and should be read in conjunction with its provisions.

By using the Website, using any of its services or applications, or by initiating the same, you as the User consent to the processing of your personal data in accordance with the provisions of this Policy. The Service Provider shall provide information on other data processing not listed in this Policy, related to the operation of the Website and the Service Provider's services, at the time of data collection.

I. Data controller, data processor

1. Website Services

Data Controller: Pepita Group Zrt.

Place of residence: 5520 Szeghalom, interior zone lot no. 2916/58.

Location: 5520 Szeghalom, Kandó Kálmán street 1.

Tax number: 27124253-2-04

Company registration number: 04-10-001650

Customer service:

E-mail: help@pepita.com

2. The Partners selling products on the Service Provider's Website and associated sites act as independent data controllers in relation to the personal data provided during the purchase/ enquiry. The Service Provider uses ZeroTime Services Kft (address: 2013 Pomáz, Mikszáth Kálmán street 36/4.) as a data processor for the operation of the IT system underlying the system.
3. In addition, the Service Provider uses Wanadis Kft. (1112 Budapest, Budaörsi Road 153.), Barilliance Ltd. (Israel, Tel Aviv, 4730160 Ramat Hasharon, Nahshon House 32.) as data processor and Hotjar Ltd. as chat service provider (Hotjar: Website Heatmaps & Behavior Analytics Tools).
4. The Data Protection Officer of Pepita Group Zrt: In view of the existence of the mandatory case under Article 37 of the GDPR Regulation - systematic and systematic large-scale monitoring of data subjects - the appointment of a Data Protection Officer was made on 24.05.2018. The Data Controller hereby informs the Data Subjects that if the Data Controller becomes aware of a procedure, incident or other circumstance that raises data protection concerns, which otherwise may be objectionable from a legal and/or technical or organisational point of view, or at least justifies investigation, they may contact the Data Protection Officer at the following contact details:
5. Name and contact details of the Data Protection Officer: Gill & Murry Kft. address: 1023 Budapest Árpád Fejedelem Road 26-28, email: gdpr@pepita.hu

II. Concepts

The terms used in the Privacy Notice shall be understood in accordance with the definitions set out in Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR") and the interpretative provisions of Act CXII

of 2011 on the Right to Information Self-Determination and Freedom of Information (the "Info Act"), as well as the definitions set out in the General Terms and Conditions applicable to users.

1. Personal data: data that can be associated with the Data Subject, in particular the name, the identification mark and one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity, and the inference that can be drawn from the data concerning the Data Subject
2. Data subject: any natural person identified or identifiable directly or indirectly on the basis of personal data
3. Consent: a voluntary and explicit expression of the data subject's wishes, based on appropriate information, by which he or she gives his or her unambiguous consent to the processing of personal data concerning him or her, either in full or in relation to specific operations
4. Data processing: any operation or set of operations which is performed upon data, regardless of the procedure used, in particular any collection, recording, recording, organisation, storage, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, erasure or destruction of data, prevention of their further use, taking of photographs, sound recordings or images and physical features which can be used to identify a person (e.g. finger or palm print, DNA sample, iris image, voice)
5. Data controller: a natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes for which data are processed, takes and implements decisions regarding the processing (including the means used) or has them implemented by a processor on its behalf;
6. Transfer: making data available to a specified third party
7. Disclosure: making the data available to anyone;
8. Data erasure: rendering data unrecognisable in such a way that it is no longer possible to recover it
9. Data marking: the marking of data with an identification mark to distinguish it from other data
10. Data blocking: the marking of data with an identification mark for the purpose of limiting its further processing permanently or for a limited period of time
11. Data processing: the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;
12. Data processor: a natural or legal person or unincorporated body which processes data on the basis of a contract with the controller, including a contract concluded pursuant to a legal provision
13. System: the totality of the technical solutions that operate the automated processing of the Data Controller (hereinafter referred to as the "System")

In other respects, the terms used in this Notice shall be understood to mean the content as defined in the interpretative definitions set out in Article 3 of the Information Act.

III. Principle, source, method of data collection

1. Principles of data processing: Personal data must be obtained and processed fairly and lawfully. Personal data should be stored only for specified and legitimate purposes and should not be used for any other purpose. The scope of the personal data processed must be proportionate to, and compatible with, the purpose for which it is stored and must not go beyond that purpose. Appropriate security measures should be taken to protect personal data stored in automated data files against accidental or unlawful destruction or accidental loss, and against unlawful access, alteration or dissemination.
2. Voluntary consent: the Data Controller processes the personal data of natural persons, Data Subjects included in this Notice in connection with the performance of an agreement based on a real act between the parties (voluntary consent) on the basis of the Data Subjects' voluntary, informed and explicit consent pursuant to Article 6(1)(a) of the GDPR. Given that each personal data is processed by the Controller with the voluntary, informed and explicit consent of the Data Subject, in the case of personal data of Data Subjects where the identity of the Data Subject and the identity of the person providing the personal data is

not the same, the Data Subject is responsible for the accuracy and processability of the personal data; unless the Controller's possible bad faith would not exclude such responsibility.

3. Source of data processing: the data processed is collected directly from the Data Subject.
4. The Data Controller processes the personal data included in this Notice in accordance with the data protection legislation in force, international conventions on data protection, EU legal acts and other applicable legislation, in compliance with this Notice, or where necessary for the purposes of complying with a relevant legal obligation, for the purposes of the legitimate interests pursued by the Data Controller or a third party, and where such interests are proportionate to the restriction of the right to the protection of personal data, in accordance with Article 6(1)(f) of the GDPR and the provisions of the relevant sectoral legislation.
5. Therefore, the Data Controller is subject to Article 6(1) of Chapter II of the GDPR Regulation.
 - "the data subject has given consent to the processing of his or her personal data for one or more specific purposes"
 - "processing is necessary for the performance of a contract to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into a contract",
 - "processing is necessary for compliance with a legal obligation to which the controller is subject"
 - "the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child".
6. Method of data collection: the Data Controller receives and obtains the Data Subjects' data under this Notice, in each case on the basis of the Data Subjects' voluntary consent, directly from the Data Subject in person or through its Website and associated pages. In all cases, the Data Subject is responsible for the accuracy of the personal data provided. The Controller does not verify the personal data provided to it. By entering into any contract to which the subject matter of the Controller's Notice applies, Data Subjects expressly accept this Notice.

IV. Data processing related to orders, requests for proposals

1. Scope of data processed: the Data Controller processes the following data about the Data Subjects in connection with orders placed on pepita.com: name, e-mail address, telephone number, address, list of products purchased, which in the case of orders placed by a company is also accompanied by the company's tax number.
2. Legal basis for processing: The data listed in point 1 are processed by the Data Controller in accordance with Article 6 (1) (b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR Regulation) (for the performance of a contract).
3. Purpose of Data Processing: the data specified in this section is processed by the Data Controller in order to fulfil the contract, to send communications and notifications related to the fulfilment of orders, to identify the User's rights (the partial services that the User may use), to send system messages related to the status of the product order.
4. Transfer of data: the data controller does not transfer the scope of the data defined above to third parties. If the user purchases a product offered for sale by a third party or requests an offer for such a product via the Website, the Data Controller will transmit the following data to the third party selling the product: name, telephone number, e-mail address, address, list of products purchased / list of products covered by the request for offer, including the company's tax number in the case of orders by a company. The legal basis for the transfer of data is Article 6(1)(b) of the GDPR (for the performance of a contract).
5. Duration of data processing: the Data Controller deletes the data after the order, unless they are necessary for invoicing, in which case the minimum data required for this purpose are processed for 8 years pursuant to Article 169 (2) of Act C of 2000 on Accounting.

6. Persons with access: the Data Controller limits the number of persons with access to the minimum and guarantees that only persons who are involved in the execution/execution of the order have access to the personal data.

V. Data processing for marketing purposes

1. Data processed: first and last name of the user, email address, number of children, year of birth of the user and the year of birth of his/her child, as well as any data provided by the user on the website or in a promotion, purchasing habits, user behaviour. Personal data used for marketing purposes and included in product reviews.
2. Legal basis for processing: the legal basis for processing the data listed in point 1 is the user's voluntary consent (Article 6(1)(a) of the GDPR). The user can also give consent by ticking a separate box when using certain services (e.g. purchases, enquiries, competitions).
3. Purpose of data processing: to provide the user with better, personalized recommendations, to send newsletters, e-DM, to improve the user experience.
4. Transfer of data: the Data Controller does not transfer data to third parties.
5. Duration of processing: the data controller is entitled to process the personal data specified in point 1 until the user concerned voluntarily withdraws it, separately with regard to each marketing activity (e.g. newsletter, eDM). At the time of withdrawal, the Controller shall delete all data of the user concerned that it has collected for the purposes set out in point 3, unless it has a legal basis for further processing of the data other than voluntary consent. The termination of the Services of the Website, the closure of its sweepstakes, the deletion of the Facebook application by which the user has given his consent shall not result in the withdrawal of the consent to send marketing communications.
6. Data Controller:
 - a) Árukereső (Online Comparison Shopping Kft.; address: 1074 Budapest, Rákóczi Road 70-72.): stores the e-mail address of users as a data processor for the purpose of conducting a customer satisfaction survey.
 - b) Wanadis Kft. (1112 Budapest, Budaörsi Road 153.)

Data processed: users' e-mail addresses, names, consent to direct marketing enquiries, the date of such enquiries, themes resulting from previous purchases, the delivery method used; analytical data relating to the sending and delivery of messages (e.g. date, content and time of sending and opening, date, content and time of clicking on the link in the letter, reason for undeliverability).

Role: sending e-mail newsletters including advertising to interested parties, displaying marketing messages, providing information about current information and promotions related to the products, offers and services of Pepita Group Zrt., direct marketing inquiries, contacting. When subscribing to the newsletter, the data provided by the User will be processed.
 - c) Barilliance Ltd. (Israel, Tel Aviv, 4730160 Ramat Hasharon, Nahshon House 32.)

Data transmitted: e-mail address, consent to be contacted for direct marketing purposes, date and time of consent, themes resulting from previous purchases, delivery method used; offers, analytical data (e.g. date of opening, date, content and time of clicking on the link in the letter, reason for undeliverability).

Role: display of marketing messages, information about current information and promotions related to the products and services of Pepita Group Zrt.
7. Persons with access: the Data Controller limits the number of persons with access to the minimum and guarantees that only persons who are involved in the execution/execution of the order have access to the personal data.

VI. Online payment data management

1. Advance payment

- 1.1 Data processed: user name, surname, first name, address, telephone number, e-mail address, bank account number.

- 1.2 Legal basis for processing: the data listed in point 1 are processed by the Data Controller on the basis of Article 6 (1) (b) of the GDPR (for the performance of a contract).
- 1.3 Purpose of data processing: to provide customers with the option of online payment in advance.
- 1.4 Data transmission: name, e-mail address, billing address, delivery address
- 1.5 Duration of data processing: pursuant to Section 169 (2) of Act C of 2000 on Accounting, the duration of data processing is 8 years.

2. Credit card payment and withdrawal

The Data Controller does not record or store any credit card data during the online payment (Stripe) provided during the purchase in the webshop available on the Website.

When you pay online, your credit card details are recorded/saved on the Stripe Technology Europe Limited platform, for which Stripe Technology Europe Limited (25/28 North Wall Quay, Dublin 1, D01H104, Ireland) acts as the Data Processor to the Data Controller. The storage of cards on Stripe's system is carried out in a continuously audited environment in compliance with the PCI-DSS Data Security Standard for bank card storage. For security reasons and in accordance with card company regulations, even the Data Controller does not have access to the card data or to the unique identifier (card password) provided by the Data Subject as a User.

By accepting this Privacy Statement, the User declares that he/she acknowledges that the following personal data stored by the Data Controller Pepita Group Zrt. (registered office: 5520 Szeghalom, interior zone lot no. 2916/58.) in the user database of the pepita.com Website will be transferred to Stripe Technology Europe Limited as data processor. The scope of the data transmitted by the data controller is as follows.

The nature and purpose of the processing activities carried out by the data processor can be found in the Stripe Privacy Notice at the following link: <https://stripe.com/en-hu/privacy>

VII. Complaints handling, Compensation

1. Data processed: name, email address, telephone number, order-related data (order number), product image, video.
2. Legal basis for processing: the legal basis for processing is Article 6(1)(b) of the GDPR (performance of the contract) and, in the case of video and images, also Article 6(1)(a) of the GDPR (user consent).
3. Purpose of data management: efficient handling of user complaints, proper examination and fulfilment of warranty obligations, contacting the complainant in order to clarify the complaint.
4. Data transfer: if a complaint or warranty claim is received in connection with a product offered for sale by a third party through the Website, the Data Controller will forward the name, e-mail address, telephone number and order-related data of the complainant to the third party selling the product. The Data Controller shall not transmit to third parties any image or video of the product.
5. Duration of processing: the Data Controller processes the personal data specified in point 1 for the duration of the complaint or warranty claim. If the data are also necessary for invoicing, the period of processing is 8 years pursuant to Article 169 (2) of Act C of 2000 on Accounting.

VIII. Product and/or Partner Review

1. Data processed: name, e-mail address, name of municipality. The user has the possibility to upload a photo of his/her review in order to illustrate what is written in the review. With regard to the photographs, the processing does not aim to include personal data in the photograph, but if the User, as a result of a conscious decision, includes his/her own personal data in the photograph, the Data Controller will process the data on the basis of his/her consent and the User agrees to its publication in accordance with the provisions of the Data Controller's Product Review Policy.

2. Legal basis for processing: The legal basis for processing is Article 6(1)(a) of the GDPR (consent of the data subject).
3. Purpose of data processing: to improve the services provided by the reviews of the product, Partner, to improve the services of the Website, to increase the quality of the services, to enhance the user experience.
4. Content of data processing: in case of purchase, the Service Provider sends an anonymous questionnaire, which can be filled in anonymously, in which you can comment on the product and/or the Partner. Product reviews made available by the User are publicly available to anyone. If requested by the User, the Data Controller will only add the city name to the User's review.
5. Duration of processing: until the data subject's consent is withdrawn.

IX. Data processing in relation to prize draws

1. Scope of the data processed: the scope of the data processed is set out in the description or the Information Notice for the competition
2. Legal basis for processing: The legal basis for processing is Article 6 (1) (a) of the GDPR (consent of the data subject). The User may also consent separately to the processing of his/her data for marketing purposes under the conditions set out in Chapter V.
3. Purpose of data management: to improve the user experience, to run sweepstakes efficiently
4. Duration of data processing: until the User's consent is withdrawn, but no later than the completion of the service that can be won in the prize draw. Once the various competitions have ended, the consent to the separate marketing processing does not cease, but will continue to be processed by the Controller as set out in Chapter V, until the User's consent to the marketing processing is withdrawn.

X. Last order data processing

1. Scope of data processed: first name, name of the municipality specified in the delivery address of the last order.
2. Legal basis for processing: The legal basis for processing is Article 6(1)(a) of the GDPR (consent of the data subject).
3. Purpose of data management: to enhance the user experience
4. Transfer of data: personal data processed under this Chapter will not be transferred by the Data Controller to third parties.
5. Duration of processing: until the User's consent is withdrawn.

XI. Processing of data relating to telephone and mail customer service

1. Data processed: in the case of a mail service, full name, e-mail address, correspondence; in the case of a telephone service: full name, voice, telephone conversation.
2. Legal basis for processing: The legal basis for processing is Article 6(1)(a) of the GDPR (consent of the data subject) and Article 6(1)(f) of the GDPR (legitimate interest of the controller).
3. Purpose of data processing: to answer questions about the order, to manage the administration.
4. Duration of processing: the data controller shall process the data specified in point 1 for 2 years after the closure of the case, after which they shall be deleted.

XII. General features of data processing

1. Consent may be given by the legal guardian on behalf of minors under the age of 14 and otherwise incapacitated Users. Minors over the age of 14 but under the age of 16 and Users who are otherwise incapacitated may give their consent to data processing with the consent or subsequent consent of their legal representative. A minor User over the age of 16 may give consent independently, and the consent or subsequent approval of his or her legal representative is not required for the validity of his or her declaration. The Service Provider is not in a position to check the eligibility of the person giving consent or to

know the content of the legal representative's declaration, so the User or his/her legal representative guarantees that the consent is in accordance with the law. The Service Provider shall consider the proper consent of the legal representative as given.

2. The User warrants that the consent of the data subject to the processing of personal data about third natural persons made available in the course of the Service has been obtained lawfully.
3. Unless otherwise provided by law, the Service Provider may process the personal data collected for the purpose of fulfilling its legal obligations (in particular accounting obligations, contractual obligations towards Partners), or for the purpose of asserting its own or a third party's legitimate interest, if the assertion of such interest is proportionate to the restriction of the right to the protection of personal data, without further specific consent and even after the User's consent has been withdrawn.
4. The User is solely responsible for the truthfulness and accuracy of the personal data. The scope of the personal data processed is influenced or partly determined by the nature of the Services and the rules of electronic commerce, accounting and advertising, in particular Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services and Article 6 of Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising.
5. The Controller declares that it processes personal data only for the exercise of a right or the performance of an obligation. The personal data processed will not be used for private purposes, and the processing will at all times comply with the purpose limitation principle - if the purpose of the processing ceases to exist or the processing is otherwise unlawful, the data will be deleted.
6. In addition to the foregoing, the Data Controller shall transfer data only to its co-controllers and/or data processors, as defined in Section I, who are contractually bound to it and who are subject to a contractual obligation in relation to the Data Subject; accordingly, the Data Controller shall transfer data to third parties only for the purposes and to the extent necessary to fulfil the purposes set out in this Notice. Such transfers shall not place the Data Subject in a less favourable position than the data processing and data security rules set out in the current version of this Policy.

In addition, the Data Controller is entitled and obliged to transmit to the competent authorities any personal data at its disposal and stored by it in accordance with the law, which it is obliged to transmit by law or by a final decision of a public authority. In such a case, the legal basis for the transfer is Article 6(1)(c) of the GDPR Regulation (fulfilment of a legal obligation imposed on the controller).

The Data Controller cannot be held liable for such transfers and the consequences thereof.

7. The Data Controller informs Data Subjects that Data Subjects' personal data will not be transferred abroad (outside the European Union, non-EEA countries), except with the Data Subject's explicit consent and under the conditions set out in a written declaration by the parties, with safeguards in accordance with the provisions of the GDPR.

XIII. Summary: The Data Controller may process the Personal Data of Data Subjects for the following purposes, within the scope and in the following proportions

	Purpose of data processing	Operations, process description	Expected duration	Personal data - scope, type, categories
1.	Newsletters	Email enquiries with marketing content. Sending information about your purchase.	Until withdrawn	Name, email address
2.	Telephone messaging	During the purchase process, informing the Customer about any problems with the order, the success of the order, the status of the	Until cancellation, performance of contract	Name, telephone number

		parcel, etc.		
3.	Online payment	If the Customer chooses to pay online when placing an order, his/her purchase details must be stored.	Stored for 8 years	Name, address, bank account number
4.	Customer service (e-mail, telephone)	Questions about your order, complaints, administration, warranty management.	Deleted 2 years after the case is closed	correspondence, telephone conversations
5.	Writing an opinion	During the ordering process, the Customer can write a review of the Product and/or the Partner, which will be displayed by the Service Provider.	Opinions are kept permanently and made available (first name + municipality will be displayed)	Name, email, relationship to the person you are buying for
6.	Electronic invoice	If the Customer chooses to pay online when placing an order, his/her purchase details must be stored.	Stored for 8 years	Name, address
7.	Package delivery	The courier service needs the Customer's details to deliver the order.	Until cancellation, until the contract is fulfilled.	Name, address, telephone number, email address
8.	Writing a review	The visitor can write a review about the Product and/or the Partner, which will be displayed by the Service Provider.	Opinions are kept permanently and made available (first name + municipality will be displayed)	Name, email address, name of the municipality, photo
9.	Write a review (about the Service Provider)	The visitor can write an opinion about the Service Provider, about the experience of the visit, which the Service Provider displays on its website.	Reviews will be kept permanently and made available (first name + municipality will be displayed)	Name, email address

XIV. Data protection legislation

Legislation of particular relevance to the Prospectus:

1. Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: "GDPR Regulation") is the Fundamental Law of Hungary;
2. Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Information Act");
3. Act V of 2013 on the Civil Code (hereinafter "Civil Code");
4. Act CVIII of 2001 on certain aspects of electronic commerce services and information society services;

XV. Applied Data Processors

1. ZeroTime Services Kft
Address: 2013 Pomáz, Mikszáth Kálmán street 36/4.
Company registration number: 13-09-147733
Role: to operate the underlying IT system.
2. Stripe Technology Europe Limited
Address: 25/28 North Wall Quay, Dublin 1, D01H104, Ireland
Company registration number: 0599050

Role: the nature and purpose of the data processing activities carried out by the data processor can be found in the Stripe Privacy Notice, available at the following link: <https://stripe.com/en-hu/privacy>

Data transmitted: name, email address, billing data (billing name, country, postal code, city, street, house number), shipping data (surname, first name, country, postal code, city, street, house number).

3. Online Comparison Shopping Kft.

Address: 1074 Budapest, Rákóczi Road 70-72.

Company registration number: 01-09-186759

Role: the data processor is mandated to process the customer data related to the Reliable Shop Programme for the purpose of satisfaction surveys, for which purpose the processing activities are carried out in accordance with the instructions of the Controller.

on the basis of

Scope of data transmitted: e-mail address

4. Gravity Research & Development Zrt

Address: Gravity Research & Development Zrt

Company registration number: 08-10-001848

Role: to provide a recommendation system for similar products on the website operated by the Data Controller

Data transmitted: cookie and browsing data stored during the User's browsing; in the case of a purchase: e-mail address, billing and delivery data.

Gravity Research & Development Zrt's Privacy Policy can be found at the following link: <https://yuspify.com/privacy-policy/>

5. B-Payment Szolgáltató Zrt.

Address: Budapest, Rákóczi Road 42

Company registration number: 01-10-047882

Role: to ensure online payment transactions by credit card on the website

6. Wanadis Kft.

Address: 1112 Budapest, Budaörsi Road 153.

Company registration number: 01-09-885144

Role: sending e-mail newsletters including advertising to interested parties, displaying marketing messages, providing information about current information and promotions related to the products, offers and services of Pepita Group Zrt., direct marketing inquiries, contacting. When subscribing to the newsletter, the data provided by the User will be processed.

Data processed: users' email addresses, names, consent to direct marketing enquiries, the date of such enquiries, themes resulting from previous purchases, the delivery method used; analytical data relating to the sending and delivery of messages (e.g. date, content and time of sending and opening, date, content and time of clicking on the link in the letter, reason for undeliverability).

7. Barilliance Ltd.

Address: Israel, Tel Aviv, 4730160 Ramat Hasharon, Nahshon House 32.

Company registration number: 514280536

Role: displaying marketing messages, providing information about current information and promotions related to the products and services of Pepita Group Zrt., and processing the data provided by the User when subscribing to the newsletter.

Data transmitted: e-mail address, consent to direct marketing enquiries, date and time of consent, themes resulting from previous purchases, delivery method used; offers, analytical data e.g. date and time of opening, date, content and time of clicking on the link in the letter, reason for non-deliverability.

8. Microsoft Advertising (Bing Ads)

Address: 70 Sir Rogerson's Quay, Dublin 2, Ireland

Company registration number: 256796

Role: Microsoft Advertising (Bing Ads) uses remarketing to place visitor-tracking cookies on Users' devices that track visitors' online behaviour.

XVI. User's rights in relation to data management: modification, deletion, blocking; right to object to data management; right to information

1. The User can notify the Service Provider of any changes to the data provided during the purchase by sending an e-mail to the customer service gdpr@pepita.hu. If the User notifies the Service Provider of his/her intention to modify the data via the customer service e-mail address or telephone number, the Service Provider will forward his/her request to the Partner.
2. The Service Provider will store and make available the product reviews (first name and city name provided) for the operation of the Service until the legal relationship with the evaluated Partner (Product), but will make them available upon the request of the data subject to the email address gdpr@pepita.hu without name, only indicating the municipality of the evaluator. The Service Provider reserves the right to partially delete, remove and reject the reviews for its own reasons.
3. Consent to direct marketing or solicitation of advertising content by type of solicitation (e.g. Pepita Group Zrt. Newsletter, e-DM) can be obtained by sending a link to the bottom of the e-mail, by sending an e-mail to gdpr@pepita.hu or by contacting Pepita Group Zrt. 5520 Szeghalom, interior zone lot no. 2916/58.
4. In cases other than the above - with the exception of the so-called mandatory data processing - the User may request the deletion of his/her personal data by sending an email to gdpr@pepita.hu.
5. The Service Provider will delete the User's personal data without the User's request if:
 - a.) treatment is unlawful;
 - b.) the purpose of the processing has ceased;
 - c.) the statutory time limit for storing the data has expired;
 - d.) ordered by a court or the National Authority for Data Protection and Freedom of Information;
 - e.) if the processing is incomplete or inaccurate and this situation cannot be lawfully remedied, provided that erasure is not excluded by law.
6. Instead of deleting the personal data, the Service Provider shall block the personal data if the User so requests or if, based on the information available to it, it can be assumed that deletion would harm the legitimate interests of the User. Personal data blocked in this way shall be processed by the Service Provider only for as long as the data processing purpose that precludes the deletion of the personal data persists. Following the withdrawal of the User's consent, the Service Provider may continue to process personal data concerning the User, provided that it has another legal basis for doing so in accordance with points IV to XI.
7. The Data Subject may object to the processing of his or her personal data in accordance with Article 21(2) of the Information Act, in particular if the processing or transfer of the personal data is necessary solely for the fulfilment of a legal obligation to which the Data Controller is subject or for the purposes of the legitimate interests pursued by the Data Controller, the data recipient or a third party, except in the case of mandatory processing;
 - if the personal data are used or disclosed for direct marketing, public opinion polling or scientific research purposes; and
 - in other cases specified by law.
8. The Data Subject may object to the processing of his or her personal data by sending an email to gdpr@pepita.hu.

9. The Data Controller shall examine the objection within the shortest possible period of time from the submission of the request, but not later than fifteen (15) days, shall decide on the merits of the objection and shall inform the applicant in writing of its decision. The Data Controller shall suspend the processing for the duration of the examination, but for a maximum of five (5) days. If the objection is justified, the head of the department processing the data shall act in accordance with Article 21(3) of the Information Act. If the Data Controller establishes that the Data Subject's objection is justified, the Data Controller shall terminate the processing, including further recording and transmission of the data, and block the data, and shall notify the objection and the measures taken on the basis of the objection to all those to whom the personal data concerned by the objection were previously disclosed and who are obliged to take action to enforce the right to object. If the Data Subject disagrees with the decision of the Controller or if the Controller fails to comply with the time limit, the Data Subject may, within thirty (30) days of the notification of the decision or the last day of the time limit, have recourse to the courts.
10. If the data processing (e.g. accounting) is ordered by law, the Service Provider may not delete the User's data, but shall not transfer the personal data to the data recipient if the User has agreed to the objection or the court has determined the validity of the objection.
11. The User has the right to request information at any time about the personal data concerning him/her processed by the Service Provider in connection with the services of the Website by sending an e-mail to gdpr@pepita.hu. Upon the User's request, the Service Provider shall provide information about the data concerning the User, processed by the Service Provider or by a data processor commissioned by the Service Provider in connection with the given service, their source, the purpose, legal basis and duration of the data processing, the name and address of the data processor, the legal basis and recipient of the data transfer, and the data processing activities. The Service Provider shall provide the requested information within a maximum of 30 days from the date of the request.
12. Court, public prosecutor's office, investigating authority, rule-breaking authority, administrative authority, the National Authority for Data Protection and Freedom of Information, or other bodies authorized by law may request the Service Provider to provide information, to disclose data, to transfer data or to provide documents. The Service Provider shall provide the requesting body with the personal data necessary to achieve the purpose of the request, provided that the exact purpose and scope of the data have been specified.
13. The Data Subject may request information on the processing of his or her personal data, and may request the rectification or - except for processing required by law - the erasure of his or her personal data on the basis of this Notice, in particular by using the contact details provided above.
14. Upon the Data Subject's request by e-mail, the Data Controller shall provide information about the data processed by the Data Controller, the purpose, legal basis and duration of the processing, the name, address (registered office) and activity of the data processor, as well as the persons who receive or have received the data and the purposes for which the data are received. The Data Controller shall provide the information in writing, in an intelligible form, free of charge, within the shortest possible period of time from the submission of the request, but not later than thirty (30) days, and shall charge a fee only in the cases provided for in Article 15 (5) of the Information Act. The information shall include the information specified in Article 15 (1) of the Information Act, unless the information of the data subject may be refused by law.
15. The Data Controller is obliged to correct personal data that is not accurate. The Controller shall delete the personal data if:
 - a.) treatment is unlawful,
 - b.) the data subject requests it - in which case within a maximum of five (5) working days,
 - c.) it is incomplete or incorrect and this condition cannot be lawfully corrected, provided that deletion is not precluded by law,
 - d.) the purpose of the processing has ceased, the statutory time limit for the storage of the data has expired, or the court or the National Authority for Data Protection and Freedom of Information has ordered it.

16. The Data Controller shall notify the Data Subject of the rectification and erasure, as well as all those to whom the data were previously transmitted for processing. The notification may be omitted if this does not harm the legitimate interests of the data subject in relation to the purposes of the processing.
17. If the Data Subject uses personal data in an unlawful or fraudulent manner, or if the Data Subject commits a criminal offence, the Data Controller reserves the right to retain the relevant data in the event of such use for the purpose of providing evidence in any litigation or non-litigation proceedings until the conclusion of the proceedings. The latter shall also apply mutatis mutandis in the event that the erasure of personal data has been requested by the Data Subject in order to prevent or at least to make more difficult the enforcement of a legitimate claim by the Controller.
18. The Data Controller shall compensate the damage caused to others by the unlawful processing of the Data Subject's data or by the breach of the requirements of technical data protection. The Controller shall be exempted from liability if it proves that the damage was caused by an unavoidable cause outside the scope of the processing. No compensation shall be payable in so far as the damage resulted from the intentional or negligent conduct of the injured party.
19. The provision of information to data subjects may be waived/rejected or restricted, subject to the provisions of Article 16 (2) of the Information Act, for the reasons and with detailed reasons set out in Article 9 (1) or Article 19 of the Information Act, if.
 - the data subject already has the information;
 - the provision of the information in question proves impossible or would involve a disproportionate effort, in particular in the case of processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, taking into account the conditions and guarantees laid down in Article 89(1) of the GDPR Regulation, or where the obligation to provide information is likely to render impossible or seriously impair the achievement of the purposes of such processing. In such cases, the controller shall take appropriate measures, including making the information publicly available, to protect the rights, freedoms and legitimate interests of the data subject;
 - the acquisition or disclosure of the data is expressly required by Union or Member State law applicable to the controller, which provides for appropriate measures to protect the data subject's legitimate interests; or
 - the personal data must remain confidential under an obligation of professional secrecy imposed by EU or Member State law, including a legal obligation of secrecy.
20. In other respects, the Data Subject is entitled to have access to personal data concerning him or her and to the following information:
 - A copy of your personal data (for additional copies, see below)
 - Purposes of data processing
 - Categories of data
 - Data related to automated decision-making, profiling
 - Source information when transferring data
 - Addressees to whom the data have been or will be communicated
 - Information and guarantees regarding data transfers to third countries
 - Duration of storage, its aspects
 - Rights of the data subject
 - Right to apply to the Authority
21. How to exercise the right of access: if the data subject has made the request by electronic means, the information must be provided in a commonly used electronic format, unless the data subject requests otherwise. The right to request a copy must not adversely affect the rights and freedoms of others.
22. If the data controller has disclosed the data and is under an obligation to delete it, it shall take reasonable steps, taking into account the available technology and the cost of implementation, to inform other data controllers about the deletion of the links, copies or duplicates in question. The data subject may not

exercise the right to erasure or blocking where the processing is necessary for: freedom of expression, the performance of a legal obligation or the exercise of official authority, public health, archiving in the public interest, scientific or historical research purposes, the exercise of legal claims

23. The Data Controller shall limit the processing at the request of the Data Subject if:
 - the Data Subject contests the accuracy of the personal data
 - the processing is unlawful and the Data Subject objects to the erasure of the data
 - the Controller no longer needs the personal data but the Data Subject requires them for the establishment, exercise or defence of legal claims
 - the Data Subject has objected to the processing and the Controller is still investigating.
24. Obligation to notify: the Data Controller shall inform all recipients to whom the data have been disclosed of the rectification, erasure or restriction. Except where this is impossible or involves a disproportionate effort.
25. Data portability: the Data Subject is entitled to receive the data that he or she has provided to the Data Controller:
 - to another controller in a structured, commonly used, machine-readable format
 - request the direct transfer of data to another controller - if technically feasible
 - except: processing for the purposes of the public interest or for the exercise of a right of public authority
26. Enforcement options: In the event of a violation of their rights, the Data Subjects may exercise their enforcement options against the Data Controller before an arbitration court in accordance with the Data Controller's general contractual terms and conditions in force and in force at the time, and may also apply to the National Authority for Data Protection and Freedom of Information (postal address: 1534 Budapest, PO Box 834; address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.).

XVII. Claims

1. Any request received from an email address previously provided to the Service Provider shall be considered as a request received from the User. In the case of claims submitted from other email addresses and in writing, the User may submit a claim only if he has duly proved his capacity as a User, as determined by the Service Provider or by law.
2. If the processing by the Service Provider is not based on the consent of the data subject, but is initiated by a third party in an abusive manner, the data subject may request the erasure of personal data relating to him/her that has been disclosed by a User, as well as information on the processing, with appropriate proof of his/her identity and his/her relationship with the personal data.
3. In the event of the death of a User, any close relative of the User or of a person who has received a testamentary benefit may request the deletion of the data concerning the User by presenting the death certificate or by sending a copy to the customer service address gdpr@pepita.hu, and by providing proof of the relationship with the User.

XVIII. Enforcement options

1. In case of alleged violation of rights in connection with the processing of personal data, the data subject may also turn to the competent court, in the capital city to the Metropolitan Court or initiate an investigation at the National Authority for Data Protection and Freedom of Information (President: dr. Attila Péterfalvi, 1024 Budapest, Szilágyi Erzsébet fasor 22/C., ugyfelszolgalat@naih.hu, +36-1-3911400, www.naih.hu).
2. Any questions or comments regarding data management can be addressed directly to the Data Controller at the following e-mail address: gdpr@pepita.hu.

XIX. Data security, data management security

1. The Service Provider shall take the necessary technical and organisational measures and establish the necessary procedural rules to ensure the security of the personal data provided or made available by the User throughout the entire data management process.
2. The Service Provider in Hungary, ZeroTime Services Kft (as an independent data controller. Access the Privacy Policy <https://zerotimeservices.com/wp-content/uploads/2020/04/Adatkezelesi-tajekoztato-20180526.pdf>). Their servers are located in the data centres of Drávanet. Addresses used for data processing data protection registration. This is where the data is physically processed and the Data Subjects' data is stored.
3. The Data Controller shall, in accordance with its obligation under Article 7 of the Information Act, do its utmost to ensure the security of the Data Subjects' data, and shall take the necessary technical and organisational measures and establish the procedural rules necessary to enforce the Information Act and other data and privacy protection rules.
4. In particular, the Data Controller shall protect the data against unauthorised access, alteration, disclosure, disclosure, erasure or destruction and against accidental destruction or accidental damage. Data that are automatically and technically recorded during the operation of the Controller's system(s) shall be stored in the System for a period of time from the moment they are generated that is reasonable for the purposes of ensuring the functioning of the System. The Controller shall ensure that such automatically recorded data cannot be linked to other personal data, except in cases required by law. If the Data Subject has withdrawn his or her consent or objects to the processing of his or her personal data, his or her identity will no longer be identifiable from the technical data, except for investigative authorities and their experts.
5. If this is the case, the employees of the Data Controller's departments who handle personal data are obliged to keep the personal data they have learned as business secrets. To this end, our employees who process personal data and have access to it have signed a confidentiality agreement. At the same time, the employees of the Data Controller are specifically obliged and in the course of their work ensure that no unauthorised persons have access to personal data. Personal data are stored and stored in such a way that they cannot be accessed, accessed, altered or destroyed by unauthorised persons.
6. The chief executive officer of the Data Controller with decision-making powers shall determine the organisation of data protection, the tasks and powers relating to data protection and related activities, and the person responsible for supervising data processing, taking into account the specific characteristics of the Data Controller.

XX. Logging data

During the use of the Website, the time of the visit to the Website and the time of each conversion event (e.g. registration, purchase, newsletter and e-DM subscription, sweepstakes registration), the IP address of the visitor and the address of the page viewed are recorded. These data are continuously logged by the system to prevent abuse, to generate statistics and to monitor the performance and functioning of the Website services, and are kept with personal data relating to the event.

XXI. Cookie (cookie)

The Service Provider uses "cookies" on its Website and associated pages to provide a more complete service to its visitors. For the purpose of customized service and convenience features, browser cookies store until deleted the product viewed, the time of last access to the site, identification in the chat function, products placed in the shopping cart, closing the newsletter (popup) pop-up window. The use of the browser cookie can be refused by selecting the appropriate settings on the browser(s), in which case the User will not be able to use this convenience feature. The "cookies" used on the Service Provider's Website are those indicated in the table below: <https://pepita.hu/cookie-hasznalat#cookie-renew>

XXII. Web analytics and ad-serving external companies

1. The Service Provider uses external web analytics and ad serving companies for the operation of the Website, which perform their activities independently of the Service Provider.
2. The Service Provider is a partner of Google Inc. Google Analytics and Google Adwords. Google Inc. uses cookies and web beacons (web beacons) to collect information and to help analyse the use of the Website. The information stored by the cookie (including the User's IP address) is stored on servers of Google Inc. in the United States. Google Inc. may transfer the information collected to third parties where required to do so by law, or where such third parties process the information on behalf of Google Inc. In the context of Google Adwords remarketing, Google Inc. places visitor-tracking cookies on Users' devices that track visitors' online behaviour and allow Google Inc. to serve them advertising on other websites based on their behaviour and interests. The tracking cookie also allows Google Inc. to identify the User on other websites. Google Inc. "Privacy Policy" is available at <http://www.google.hu/intl/hu/policies/privacy/>. For more useful information about Google Inc.'s data-related activities and about disabling cookies and personalisation of advertising, please visit the Google Inc. website at <http://www.google.com/intl/hu/policies/privacy/ads/>. There is no opt-out for the web beacon.
3. The Service Provider uses Microsoft Advertising (Bing Ads). This contains cookies to collect information and to help analyse the use of the website. Microsoft may transfer the information collected to third parties where required to do so by law or where such third parties process the information on Microsoft's behalf. Bing Ads uses remarketing to place visitor-tracking cookies on Users' devices that track visitors' online behavior. Microsoft's policies are available at <https://privacy.microsoft.com/hu-hu/privacystatement>. For more information about Microsoft's use of cookies, please visit <https://support.microsoft.com/en-us/topic/description-of-cookies-ad01aa7e-66c9-8ab2-7898-6652c100999d>

XXIII. External intermediary service providers

1. The operator of external services (e.g. Instagram, Twitter, Facebook, Pinterest, etc.) that enable the sharing of content made available within the framework of the Services and shared on various social networking sites is the data controller of personal data, and its own terms of use and privacy policy apply to its activities. For services embedded within the Services but maintained by an external service provider, the operator of that service is also the data controller.
2. In the case of installation of applications available on the Facebook page of Pepita Group Zrt., Pepita.com, the Service Provider provides the Service Provider with the personal data specified in the information made available by Meta Platforms Inc. during installation, based on the User's voluntary consent and in compliance with the privacy policy of Facebook Inc. Where a Facebook application refers to this notice, the Privacy Policy shall govern the Service Provider's data processing accordingly, otherwise the data processing within the Facebook service (e.g. deleting an application, posting a comment, etc.) shall be governed by the Facebook Privacy Policy. Deleting applications can be initiated in the Facebook user settings under the application menu. The details of the data processing in connection with the sweepstakes available on the Facebook page of the Service Provider Pepita Group Zrt. The deletion of a Facebook application of the Service Provider does not result in the withdrawal of consent to send direct marketing or advertising requests.

XXIV. Amendments to the Privacy Notice

1. The controller reserves the right to amend this Privacy Notice at any time by unilateral decision. The User accepts the provisions of the Privacy Policy in force at any given time by entering the website, without the need to obtain the User's consent.
2. Possibility to amend this Privacy Notice: the Data Controller reserves the right to unilaterally amend this Privacy Notice in the future. The Data Controller reserves the right to revise this Privacy Notice at any time without prior notice.
3. Records of processing activities
The controller and, if any, its representative, of the processing activities carried out under its responsibility keeps records of. This register contains the following information:

- the name and contact details of the controller and, where applicable, the name and contact details of the joint controller, the controller's representative and the Data Protection Officer;
 - the purposes of the processing
 - a description of the categories of data subjects and the categories of personal data;
 - the categories of recipients to whom the personal data are or will be disclosed, including recipients in third countries or international organisations;
 - where applicable, information on the transfer of personal data to a third country or an international organisation, including the identification of the third country or international organisation and, in the case of a transfer pursuant to the second subparagraph of Article 49(1) of the GDPR Regulation, a description of the appropriate safeguards;
 - if possible, the time limits envisaged for the deletion of the different categories of data; if possible, a general description of the technical and organisational measures referred to in Article 32(1).
4. The controller shall make the register available to the supervisory authority upon request.