

Analogvinyl.com

# Privacy Policy

## INTRODUCTION

Svábhús Kkt. (hereinafter referred to as the "Service Provider" or "Data Controller"), with its registered office at 3 Külsővásártér, Debrecen 4025, adheres to the following information. In accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, we provide the following information. This data processing notice regulates the handling of data on the following website: <https://analogvinyl.com>

The data processing notice is accessible at the following link: [https://analogvinyl.com/tartalom/privacy\\_policy.pdf](https://analogvinyl.com/tartalom/privacy_policy.pdf). Any modifications to this notice will become effective upon publication at the aforementioned address.

## DATA CONTROLLER AND CONTACT DETAILS

Name: Svábhús Kkt.  
Registered Office: 67 Epreskert Street, Debrecen 4030  
Email: [info@analogvinyl.com](mailto:info@analogvinyl.com)  
Phone: +36 20 350 0491

## CONTACT DETAILS OF THE DATA PROTECTION OFFICER

Name: Svábhús Kkt.  
Registered Office: 67 Epreskert Street, Debrecen 4030  
Email: [info@analogvinyl.com](mailto:info@analogvinyl.com)  
Phone: +36 20 350 0491

[V1] megjegyzést írt:

[V2] megjegyzést írt:

## DEFINITIONS

1. "Personal data": any information relating to an identified or identifiable natural person ("data subject"); 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 one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
2. "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 or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
3. "Data controller": the natural or legal person, public authority, agency or 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 controller or the specific criteria for its nomination may be provided for by Union or Member State law.
4. "Processor": a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
5. "Recipient": a natural or legal person, public authority, agency or another body, to which the personal data are 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 those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
6. "Consent of the data subject": any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
7. "Personal 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.

## **PRINCIPLES OF PERSONAL DATA PROCESSING**

Personal data must be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject ("lawfulness, fairness, and transparency");
- b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes shall not be considered incompatible with the initial purposes ("purpose limitation");
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ("data minimization");
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy");
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject ("storage limitation");
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures ("integrity and confidentiality").

The data controller is responsible for ensuring compliance with these principles and must be able to demonstrate such compliance ("accountability").

## **DATA PROCESSING**

### **DATA PROCESSING RELATED TO THE OPERATION OF THE WEB STORE**

The fact of data collection, scope of processed data, and purpose of data processing:

Personal Data	Purpose of Data Processing
User Name	Identification, enabling registration.
Password	Facilitating secure access to the user account.
First and Last Name	Contact, necessary for purchase and the issuance of regular invoices.
Email Address	Communication.
Phone number	Communication, more efficient coordination of billing or delivery-related inquiries.
Billing Name and Address	Issuing regular invoices, as well as defining, modifying, monitoring the performance of the contract, invoicing of related charges, and asserting related claims.
Shipping Name and Address	Enabling home delivery.
Date of purchase/registration	Execution of technical operations.
IP address at the time of purchase/registration	Execution of technical operations.

Neither the username nor the email address needs to contain personal data.

1. The scope of data subjects: All data subjects who are registered/purchasing on the web store website.
2. Duration of data processing, deadline for data deletion: Immediately upon deletion of registration. Except for accounting records, as the Accounting Act of 2000, Act C requires keeping such data for 8 years.

*Accounting records that directly or indirectly support the accounting (including the*

*general ledger accounts, analytical, or detailed records) must be retained in a readable format and retrievable manner for at least 8 years based on references in the accounting records.*

3. Persons authorized to access the data and recipients of personal data: Personal data may be processed by the data controller's sales and marketing staff while respecting the above principles.
4. Explanation of the data subject's rights related to data processing: The data subject may request access to their personal data, rectification, erasure, or restriction of processing from the data controller. The data subject has the right to object to the processing of their personal data. The data subject has the right to data portability. The data subject has the right to withdraw their consent at any time.
5. The data subject can initiate access to personal data, erasure, modification, or restriction of processing, data portability, and objections to data processing through the following methods:
  - By mail at 3 Külsővásártér, Debrecen 4025.
  - By email at [info@analogvinyl.com](mailto:info@analogvinyl.com).
  - By phone at +36 20 350 0491.
  - Modifications can be made after logging in, in the "Login/My Data" section.
6. The legal basis for data processing:
  - 6.1 Consent of the data subject, Article 6(1)(a) point, Section 5(1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as "Infotv.").
  - 6.2 Electronic Commerce Services and Information Society Services Act CXII of 2001 (hereinafter referred to as "Elker tv."), Section 13/A(3): The service provider may process personal data that is technically indispensable for providing the service. In cases of uniformity in other conditions, the service provider must select and operate the tools used in the provision of information society services in a manner that personal data is processed only if absolutely necessary for providing the service and for fulfilling other purposes defined in this law, but even in this case, only to the necessary extent and duration.
  - 6.3 In the case of issuing invoices in accordance with accounting regulations, Article 6(1)(c) point.
7. We inform you that:
  - Data processing is based on your consent.
  - You are obligated to provide personal data for us to fulfill your order.
  - Failure to provide data will result in us being unable to process your order.

**MANAGEMENT OF COOKIES**

1. Cookies commonly used for online stores include "session cookies for password-protected sessions," "cookies necessary for the shopping cart," and "security cookies," for which no prior consent is required from the data subjects.
2. The fact of data processing, the scope of processed data: Unique identifier, dates, timestamps.
3. The scope of data subjects: All visitors to the website.
4. Purpose of data processing: User identification, keeping track of the "shopping cart," and tracking visitor activity.
5. Duration of data processing, deadline for data deletion:

<b>Cookie Type</b>	<b>Legal Basis for Data Processing</b>	<b>Duration of Data Processing</b>	<b>Scope of Processed Data</b>
Session Cookies	Section 13/A(3) of Act CXII of 2001 on Electronic Commerce Services and Information Society Services	Until the end of the respective visitor's session	connect.sid

6. Persons authorized to access the data: The data controller does not process personal data through the use of cookies.
7. Explanation of data subjects' rights regarding data processing: Data subjects have the option to delete cookies through the browser's Tools/Settings menu, typically under the Data Privacy settings.
8. Legal basis for data processing: Prior consent of the data subject is not required if the sole purpose of using cookies is the transmission of communications via an electronic communications network or is strictly necessary for the provision of an information society service explicitly requested by the subscriber or user.

**USE OF GOOGLE ADWORDS CONVERSION TRACKING**

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1. The data controller utilizes the "Google AdWords" online advertising program and, within it, the Google Conversion Tracking service. Google Conversion Tracking is an analytical service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").
2. When a user accesses a website via a Google advertisement, a cookie necessary for conversion tracking is placed on their computer. The validity of these cookies is limited, and they do not contain any personal data, making it impossible to identify the user.
3. As long as the cookie has not expired, and the user browses certain pages of the website, both Google and the data controller can see that the user clicked on the advertisement.
4. Each Google AdWords customer receives a different cookie, meaning that cookies cannot be tracked through the websites of AdWords customers.
5. The information obtained through conversion tracking cookies is used to create conversion statistics for AdWords customers who have opted for conversion tracking. These statistics inform customers about the number of users who clicked on the advertisement and were directed to a page with a conversion tracking tag. However, this information does not allow for the identification of any specific user.
6. Users who do not wish to participate in conversion tracking can opt out by disabling cookies in their browser settings. In this case, users will not appear in the conversion tracking statistics.
7. Further information and Google's privacy policy can be found at: [www.google.de/policies/privacy/](http://www.google.de/policies/privacy/).

### **USE OF GOOGLE ANALYTICS**

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies," which are text files stored on your computer, to analyze your use of the website.

1. Information generated by cookies about your use of the website is usually transmitted to and stored on Google's servers in the United States. With IP anonymization enabled on this website, Google shortens your IP address within the European Union member states or other parties to the Agreement on the European Economic Area before transmitting it to the United States.

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2. Only in exceptional cases will the full IP address be transmitted to Google's servers in the United States and then shortened. On behalf of the website operator, Google will use this information to evaluate your use of the website, compile reports on website activity, and provide other services related to website and internet usage.
3. Google Analytics does not associate your IP address with any other data held by Google. You can prevent cookies from being stored by adjusting your browser settings; however, please note that if you do this, you may not be able to use all the features of this website.
4. You can also prevent Google from collecting and processing data generated by cookies related to your website usage (including your IP address) by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

### **NEWSLETTER, DIRECT MARKETING ACTIVITY**

1. Pursuant to Section 6 of Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Economic Advertising Activity, users may explicitly and voluntarily consent to receive promotional offers and other communications from the Service Provider at the contact details provided during registration.
2. Furthermore, the Client, taking into account the provisions of this notice, may consent to the processing of personal data necessary for sending promotional offers by the Service Provider.
3. The Service Provider does not send unsolicited advertising messages, and users can freely unsubscribe from receiving offers without restrictions or explanations. In this case, the Service Provider will delete all personal data necessary for sending advertising messages and will not contact the user with further promotional offers. Users can unsubscribe from emails by clicking on the provided link.
4. Data collection: Name, email address. Purpose of data processing: Enabling newsletter subscription. Timestamp of subscription: Performing a technical operation. IP address at the time of subscription: Performing a technical operation.
5. The scope of data subjects: All users subscribing to the newsletter.



6. Purpose of data processing: Sending electronic messages containing advertisements (email, SMS, push notifications) to the data subject, providing information about current news, products, promotions, new features, etc.
7. Duration of data processing, deadline for data deletion: Until the consent is withdrawn, i.e., until unsubscribed.
8. Persons authorized to access the data: The personal data may be processed by the Service Provider's sales and marketing staff, while respecting the principles mentioned above.
9. Explanation of data subjects' rights regarding data processing:
  - The data subject may request access to their personal data, their correction, deletion, or restriction of processing, and may object to the processing of such personal data.
  - The data subject has the right to data portability and the right to withdraw consent at any time.
10. Data subjects can exercise their right to access, delete, modify, or restrict data processing, as well as data portability, and can object to data processing through the following means:
  - By mail to 4025 Debrecen, Külsővásártér 3.
  - By email to [info@analogvinyl.com](mailto:info@analogvinyl.com).
  - By phone at +36 20 350 0491.
11. Data subjects can unsubscribe from the newsletter at any time, free of charge.
12. Legal basis for data processing: Consent of the data subject, Article 6(1)(a) of the GDPR, Section 5(1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information, and Section 6(5) of Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Economic Advertising Activity:
  - Advertisers, advertising service providers, and advertisers shall keep records of the personal data of persons who have given their consent within the scope determined in the consent. Personal data recorded in this register may only be processed in accordance with the consent given, until the withdrawal of such consent, and may only be transferred to third parties with the prior consent of the data subject.
13. We inform you that:
  - Data processing is based on your consent.
  - You are obliged to provide personal data if you want to receive newsletters from us.

- Failure to provide data will result in us being unable to send you newsletters.

### **COMPLAINTS HANDLING**

1. The fact of data collection, the scope of processed data, and the purpose of data processing:

<b>Personal Data</b>	<b>Purpose of Data Processing</b>
Last name and first name	Identification, communication.
Email address	Communication.
Phone number	Communication.
Billing name and address	Identification, handling of quality complaints, questions, and issues related to ordered products.

2. Scope of data subjects: All users who shop on the webshop's website and all users who file quality complaints and submit complaints.
3. Duration of data processing, deadline for data deletion: Records of complaints, transcripts, and copies of responses based on Section 17/A(7) of Act CLV of 1997 on Consumer Protection must be retained for 5 years.
4. Persons authorized to access the data: Personal data may be processed by the data controller's sales and marketing staff, while respecting the principles mentioned above.
5. Explanation of data subjects' rights regarding data processing:
  - Data subjects can request access to their personal data, its correction, deletion, or processing restrictions.
  - Data subjects can object to the processing of their personal data.
  - Data subjects have the right to data portability.
6. Data subjects have the right to withdraw consent at any time.
7. Data subjects can initiate requests related to their personal data, including access, deletion, modification, or processing restrictions, data portability, and objections to data processing through the following means:
  - By mail to 4025 Debrecen Külsővásártér 3.
  - By email to [info@analogvinyl.com](mailto:info@analogvinyl.com).

- By phone at +36 20 350 0491.
8. Legal basis for data processing: Consent of the data subject, Article 6(1)(a) of the GDPR, Section 5(1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information, and Section 17/A(7) of Act CLV of 1997 on Consumer Protection.
9. We inform you that:
- The provision of personal data is based on a contractual obligation.
  - The processing of personal data is a prerequisite for concluding the contract.
  - You are obliged to provide personal data for us to handle your complaint.
  - Failure to provide data will result in us being unable to handle your complaint.

#### **SOCIAL MEDIA**

1. The fact of data collection, the scope of processed data: Names and publicly available profile pictures of individuals registered on social media platforms such as Facebook, Google+, Twitter, Pinterest, Youtube, Instagram, etc.
2. Scope of data subjects: All users who have registered on social media platforms and have "liked" the website.
3. Purpose of data processing: Sharing and "liking" certain elements, products, promotions, or the website itself on social media platforms to promote them.
4. Duration of data processing, deadline for data deletion, persons authorized to access the data, and explanation of data subjects' rights: The rules and regulations of the respective social media platforms govern the duration, methods, and possibilities of data processing, as well as the rights of data subjects.
5. Legal basis for data processing: The voluntary consent of the data subject to the processing of their personal data on social media platforms.

#### **CUSTOMER RELATIONS AND OTHER DATA PROCESSING**

1. If the data controller's services raise questions or issues for the data subject during their use, or if the data subject encounters a problem, they can contact the data controller through the methods provided on the website (phone, email, social media, etc.).
2. The data controller deletes emails, messages, phone calls, etc., along with the inquirer's name and email address, and any other voluntarily provided personal data, after a maximum of 2 years from the date of communication.

3. Any data processing not listed in this notice will be explained at the time of data collection.
4. In exceptional cases and upon a request by authorities, or based on legal authorization by other organizations, the Service Provider is obliged to provide information, disclose data, transfer data, or make documents available.
5. In such cases, the Service Provider will only provide the necessary amount and extent of personal data required to achieve the purpose of the request.

Please note that this is a translation, and for legal purposes, it's essential to ensure that the translated text accurately reflects the original Hungarian text and is consistent with local data protection laws and regulations. It's recommended to consult with a legal expert or translator familiar with the specific legal requirements in your jurisdiction.

### **RIGHTS OF THE DATA SUBJECT**

1. **Right of Access**  
You have the right to receive confirmation from the data controller as to whether your personal data is being processed and, if so, to access your personal data and the information listed in the regulation.
2. **Right to Rectification**  
You have the right to have inaccurate personal data concerning you rectified without undue delay upon request by the data controller. Taking into account the purposes of the processing, you also have the right to request the completion of incomplete personal data, including by means of providing a supplementary statement.
3. **Right to Erasure**  
You have the right to have your personal data erased without undue delay upon request by you, and the data controller is obliged to erase your personal data without undue delay under certain conditions.
4. **Right to Be Forgotten**  
If the data controller has made the personal data public and is obliged to erase it, it shall take reasonable steps, including technical measures, to inform other data controllers processing the personal data that you have requested the erasure of any links to, or copies or replication of, that personal data.
5. **Right to Restriction of Processing**  
You have the right to request the restriction of processing of your personal data under certain conditions, including when you contest the accuracy of the personal

data, for a period enabling the data controller to verify the accuracy of the personal data.

6. Right to Data Portability

You have the right to receive your personal data, which you have provided to a data controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided.

7. Right to Object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, including profiling based on those provisions.

8. Right to Object to Direct Marketing

If personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, including profiling to the extent that it is related to such direct marketing.

9. Automated Individual Decision-Making, Including Profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

### **TIME LIMIT FOR ACTION**

The data controller shall respond to your requests without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The data controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

If the data controller does not take action on your request, the data controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

### **DATA SECURITY**

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The data controller and the data processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including, among others:

- a) The pseudonymization and encryption of personal data;
- b) Ensuring the ongoing confidentiality, integrity, availability, and resilience of processing systems and services;
- c) The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- d) A process for regularly testing, assessing, and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

### **NOTIFICATION OF DATA BREACH TO THE DATA SUBJECT**

In the case of a personal data breach likely to result in a high risk to your rights and freedoms, the data controller shall without undue delay and, where feasible, not later than seventy-two hours after having become aware of it, notify you of the personal data breach.

The notification shall at least describe the nature of the personal data breach and contain the name and contact details of the data protection officer or other contact point where more information can be obtained; describe the likely consequences of the personal data breach; and describe the measures taken or proposed to be taken by the data controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

### **NOTIFICATION OF THE DATA SUBJECT REGARDING DATA PROTECTION INCIDENTS**

If a data protection incident is likely to result in a high risk to the rights and freedoms of natural persons, the data controller shall promptly inform the data subject about the data protection incident.

In the notification provided to the data subject, the nature of the data protection incident shall be clearly and understandably explained. The data controller shall also provide the name and contact details of the data protection officer or another contact person providing further information. Additionally, the likely consequences stemming from the data protection incident shall be outlined, along with any measures the data controller has taken or plans to take to address the data protection incident, including, if applicable, measures aimed at mitigating any adverse consequences resulting from the data protection incident.

The data subject does not need to be notified if any of the following conditions are met:

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- The data controller has implemented appropriate technical and organizational measures, particularly measures such as encryption, that render the personal data unintelligible to unauthorized persons in relation to the data affected by the data protection incident.
- The data controller has subsequently taken measures that ensure that the high risk to the rights and freedoms of data subjects is likely not to materialize.
- Notifying the data subject would require disproportionate effort. In such cases, data subjects shall be informed through public information or similar measures ensuring equally effective notification.

If the data controller has not yet notified the data subject of the data protection incident and the supervisory authority has considered whether the data protection incident is likely to result in a high risk, it may instruct the data controller to notify the data subject.

### **REPORTING OF DATA PROTECTION INCIDENT TO THE AUTHORITIES**

The data controller shall, without undue delay and, where feasible, not later than 72 hours after becoming aware of the data protection incident, report it to the supervisory authority competent under Article 55, unless the data protection incident is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by reasons for the delay.

### **COMPLAINT OPTION**

In case of an alleged infringement by the data controller, you may file a complaint with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C. Mailing Address: 1530 Budapest, P.O. Box: 5. Phone: +36-1-391-1400 Fax: +36-1-391-1410 Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

### **CLOSING REMARKS**

In preparing this information, we have taken into account the following laws and regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

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- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.)
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (particularly Section 13/A)
- Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers
- Act XLVIII of 2008 on the Essential Conditions and Certain Limitations of Business Advertising (especially Section 6)
- Act XC of 2005 on the Freedom of Electronic Information
- Act C of 2003 on Electronic Communications (specifically Section 155)
- Opinion 16/2011 on EASA/IAB Recommendations for Online Behavioral Advertising
- Recommendation of the National Authority for Data Protection and Freedom of Information on the Requirements for Prior Information
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC