

COMMSIGNIA WEBSHOP PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the „**Policy**”) was posted on and is effective as of 15 March 2019.

1. DEFINITIONS

Cookie means a small text file, which is placed on your hard disk by a web server, and is used by the Site as set forth in section Privacy below.

Communication means any comment, feedback, information or document provided by User to COMMSIGNIA via any channel.

General Data Protection Regulation or GDPR means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th 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.

COMMSIGNIA means Commsignia Ltd.
Registered office: Széchenyi u. 14., 7252 Attala, Hungary
Court of registration: Court of Szekszard
Company registration number: 17-09-010377
Tax number: HU23874664
Email address: webshop@commsignia.com
Website: www.commsignia.com

Privacy Act means Act CXII of 2011 on the right of informational self-determination and on freedom of information.

Product means Products sold via the Site by Commsignia, whether manufactured by Commsignia or a third party.

Site means <https://shop.commsignia.com> and its subdomains.

Software means Commsignia Software that may run on Commsignia Products sold via the Site or third party software.

User or "you" means a registered or not registered visitor of the Site.

User Activity means location and behavior data (language selection on the Site, products put in the User's cart), onsite browsing history, and usage patterns (frequency/patterns of logging-in).

2. PRIVACY POLICY

2.1. Purpose of this document

This Policy sets out the terms and conditions of how the User's (hereinafter referred to as the "User" or "you") personal data is processed. Please read these terms and conditions carefully!

2.2. Availability and updating of this document

COMMSIGNIA reserves the right to amend this Policy unilaterally at any time. We suggest visiting the Site from time to time for the latest information, however, you will also be informed of this Policy being amended in case of significant changes (e.g. legal basis of processing, scope of processed data, person of data processor) of the Policy.

2.3. Data controller

2.3.1. The User's personal data provided or generated on the Site is processed by COMMSIGNIA as data controller.

2.3.2. The provided or generated personal data of the User is accessible to the following persons within COMMSIGNIA:

COMMSIGNIA's employees involved in the data processing (including IT specialists performing a variety of IT tasks related to the operation and maintenance of COMMSIGNIA's computer system) as part of their role within COMMSIGNIA in connection with performing their duties associated with the purpose of this Policy.

2.4. Data processing activities

2.4.1. Processing of User's personal data for providing access to the Products and administering registration on the Site and for placing orders on the Site (or any other channel COMMSIGNIA may provide)

2.4.1.1. Purposes of data processing

- a. Provision of information for the User about Products.
- b. Providing the User with the purchased Products.
- c. Administering registration on the Site and User account maintenance.

If the User wishes to download or purchase a Product, he/she shall register on the Site.

2.4.1.2. Scope of the User's processed personal data

- User's title;
- User's name;
- User's email address;
- User's hashed password;
- User's shipping address and invoice address;
- User's company data;
- Country of permanent or temporary residence;
- User Activity

2.4.1.3. Legal basis of data processing

The data is processed in compliance with GDPR and all relevant local laws. The legal basis of data processing is the User's express consent given pursuant to point a) of Article 6(1) of the GDPR.

2.4.1.4. Duration of data processing

User's personal data specified in point 2.4.1.2 is processed for the period during which any Product is available and supported by COMMSIGNIA or until User cancels his/her account on the Site or withdraws his/her consent. Notwithstanding the above, COMMSIGNIA shall immediately delete your personal data if you specifically request the deletion thereof or withdraws your consent and there is no valid legal ground for data processing. If the User withdraws his/her consent, this does not affect the lawfulness of data processing based on his/her consent and conducted before such withdrawal.

2.5. Data processor

In order to fulfil its purposes as a data controller COMMSIGNIA cooperates with the data processors listed below. COMMSIGNIA reserves the right to change the data processors at any time.

Name of the data processor	Data processing activity carried out on behalf of COMMSIGNIA and list of the personal data the data processor has access to
<p>G Suite</p> <p>Company name: Google LLC. Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043 Website: www.google.com Contact: https://support.google.com/cloud/contact/dpo</p>	<p>Google cloud service is used to store the processed personal data listed in 2.4.1.2.</p>

2.6. Cookies

2.6.1. COMMSIGNIA hereby informs you that if you download certain parts of the Site, small data files (“Cookies”) will be automatically sent by the web server to your electronic device. In certain cases, these data files may be considered as personal data under the applicable data protection laws. These data files are necessary for the proper operation of the Site, and are used to collect information on the User’s visits to the Site.

2.6.2. The User can accept or refuse Cookies on a case-by-case basis, or refuse all Cookies by adjusting his/her browser settings. To find out how to do this and learn more on Cookies, please visit: <https://www.youronlinechoices.eu/>. If the User chooses to refuse all Cookies, access to some of the Site pages features will be limited.

Type of Cookie	Purpose of Cookies	Legal basis of data processing	Cookie retention period
Google Analytics	<p>The Site uses the Google Analytics tool to collect and analyze information on how the User uses the Site. We use the information to compile reports and improve the Site. The data is collected in an anonymous form, including the number of Users to the Site, where Users have come to the Site from, and the pages they visited within the Site. The collected data cannot be tracked back to the User. For further information on Google’s privacy policy, click here.</p>	User’s consent.	<p>Google Analytics Cookies are created as soon as the User visits a website on which a valid Google Analytics tracking code is installed. The Cookies will be held in the User’s browser for a maximum period of 2 years from the above date. For further information, please click here.</p>
Google AdWords (Google Remarketing)	<p>Third-party service providers, including Google, store previous visits made by a User to the Site, and use this information to display COMMSIGNIA’s</p>	User’s consent.	<p>The AdWords Cookies expire 90 days after the User visited the Site.</p>

	<p>advertisements to the User on the websites of Google's partners.</p> <p>When the User visits the Site, we send one or more Cookies provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) to your computer, which uniquely identify your browser. Google's remarketing Cookies are used in Google AdWords. The Cookies provided by Google remember the number and times of visits to the Site as well as the sub-pages viewed by the User when browsing the Site. The recorded data is stored anonymously.</p> <p>The User can block Google's remarketing Cookies on the opt-out page of Google's Ads Settings, and can also block third-party Cookies on the Network Advertising Initiative opt-out page.</p>		<p>For further information, please click here.</p>
Session ID	<p>Session Cookies allow the User to be recognized within the Site.</p> <p>The most common example of this functionality is the shopping cart feature of the Site. When the User visits a page of a catalogue and selects some items, the session Cookie remembers the selection, so the shopping cart will contain the selected items when the User is ready to check out.</p>	User's consent.	<p>The information is saved until the end of the current session. After that, the collected information will no longer be available.</p>
Auto login	<p>These Cookies remember the User's login information and automatically fill out the login form for the User when the User starts the login process next time.</p>	User's consent.	<p>The Cookies will be held in the User's browser for a maximum period of 6 months.</p>

2.7. Data security

COMMSIGNIA observes all applicable regulations regarding the security of personal data, therefore both COMMSIGNIA and its authorized data processors implement appropriate technical and organizational measures to protect personal data, and establish adequate

procedural rules to enforce the provisions of the GDPR and all relevant local laws concerning confidentiality and the security of data processing.

2.8. Rights and enforcement

2.8.1. Any personal information which you provide for COMMSIGNIA must be true, complete, and accurate in all respects. You agree to notify us of any change in your personal information via COMMSIGNIA's email address specified in section 1 without delay.

2.8.2. The User may exercise the following rights in relation to COMMSIGNIA's data processing activities:

- Request information on the processing of his/her personal data;
- Request the rectification of his/her personal data;
- Request the deletion of his/her personal data or restriction of the processing of his/her personal data;
- Object to COMMSIGNIA's data processing;
- Request data portability.

2.8.3. You are entitled to request information on data related to you and processing carried out by COMMSIGNIA thereof, especially information as to what personal data relating to you is stored; the sources from which they were obtained; the purpose, grounds, and duration of processing; if your personal data is made available to others, the legal basis and the recipients; and any data protection incident in relation to your personal data by sending an email or mail to the email or postal address (registered office) specified in section 1. COMMSIGNIA shall provide written information on the processing of your personal data within 1 months after receipt of the request. You may also request the correction of your personal data.

2.8.4. You are also entitled to request a structured, commonly used and machine-readable formatted copy of your personal data that COMMSIGNIA is processing subject to conditions set out in Article 20 of the GDPR.

You have the right to transmit your personal data to another controller or, where it is technically feasible, you can request COMMSIGNIA to transfer your personal data directly to another controller as specified in Article 20 of the GDPR.

2.8.5. If your personal data is inaccurate, you may request COMMSIGNIA to rectify such data, provided that the correct data is at COMMSIGNIA's disposal.

2.8.6. Your personal data shall be deleted upon your request in accordance with applicable laws. Your request for data deletion may be submitted to COMMSIGNIA by using the email or postal address (registered office) specified in section 1. COMMSIGNIA shall delete all stored personal data in compliance with this Policy by obfuscating your personal data, by making it anonym in a permanent and non-reversible manner.

2.8.7. Please be informed that your data will not be deleted if the processing thereof is required by law or other exceptions apply under applicable law.

2.8.8. You have the right to obtain restriction of processing from COMMSIGNIA in the following cases:

2.8.8.1. you think that your processed personal data is not accurate, for a period enabling COMMSIGNIA to verify the accuracy of your personal data;

2.8.8.2. the processing is unlawful and you oppose the erasure of your personal data, you are entitled to request restriction of their use instead;

2.8.8.3. COMMSIGNIA no longer needs your personal data for the purposes of processing, but you require COMMSIGNIA to continue the processing for the establishment, exercise or defense of your legal claims;

2.8.8.4. you have objected to processing, for a period pending the verification whether the legitimate grounds of COMMSIGNIA override those of yours.

2.8.9. At any time, you have the right to object to processing your personal data subject to certain conditions under applicable laws, you may separately object against processing your personal data for direct marketing purposes, including Profiling, as set out herein. In this case, COMMSIGNIA will no longer process your personal data unless if COMMSIGNIA demonstrates compelling legitimate grounds for the processing which override your interests, rights and data protection related freedoms or if the processing is necessary for the establishment, exercise or defense of legal claims.

2.8.10. You may lodge a complaint about the processing of your personal data to the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – NAIH; address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.; postal address: 1530 Budapest, Pf. 5; phone: +36-1-391-1400; facsimile: +36-1-391-1410; email: ugyfelszolgalat@naih.hu) or to the data protection authority of your home country or country of your residency.

2.8.11. Independently from lodging a complaint to NAIH, you may turn to court pursuant to the provisions set forth in the Privacy Act if your rights are infringed. Upon your decision, the procedure may be launched before the tribunal in whose jurisdiction you are domiciled or you have a temporary address. Prior to initiating a legal procedure, it may be useful to discuss the complaint with COMMSIGNIA.

2.8.12. Your detailed rights and remedies are set out in subsections 14–18 and 21–23 of the Privacy Act and in Articles 15-21 of the GDPR.

2.9. Contacting COMMSIGNIA

We value your opinion. If you have any comments, questions, or wish to obtain more information on data processing at COMMSIGNIA, please send an email or mail to the email or postal address specified in section 1. We will handle the submitted information confidentially. Our representative will contact you within a reasonable time.