

## PRIVACY POLICY

for data management by the G-SOUND Service and Trading Limited Liability Company via the website

### I. Name and data of the website owner

#### G-SOUND Ltd.

Address: 9012 Győr, Öreg út 24/b.

Phone: +36303705310

E-mail address: info@gsound.hu

Name of person responsible for data protection: Gricz József

Direct contact information: griczjozsef@gsound.hu, +36303705310

### II. Purpose and legal basis of data management

#### II. 1. Data management related to contact with potential customers (collected directly from the person concerned)

Scope of personal data	Legal basis	Goal	Source of personal data
Name, e-mail address	the consent of the data subject, which is given on the basis of this Data Management Notice	Contact	The person concerned will enter it himself.

The Company ensures the data protection rights of the data subject when contacting the affected persons electronically, highlighting among them the right to protest and deletion.

II.1. retention period of data included in point: Until the data subject withdraws his consent or objects to the data management.

#### II.2. Invoicing-related data management (if the interested party becomes a contracted partner of the Company, on the basis of which an invoice will be issued)

Scope of personal data	Legal basis	Goal	Retention time
• billing name, address, possibly tax identification number or tax number; as well as data on the time, duration and location of the use of the service.	• legal obligation <sup>1</sup>	• obligation to issue invoices	• The issued invoices and the documents on the basis of which the invoices were issued have a retention period of 8 years.

<sup>1</sup>Article 6 (1) GDPR point c), VAT no. § 159 and § 169, Account TV. Section 169. and Eker TV. § 13/A paragraph (2).

### II.3. Ügyintézésel, panasszal kapcsolatos adatkezelés

• Scope of personal data	• Legal basis	Goal	• Retention time
• full name, e-mail address, phone number, mailing address, other personal message	• legal obligation <sup>2</sup>	• responding to comments and complaints	• For 5 years after the response (The data controller must keep the report of the complaint and a copy of the response for five years and present it to the inspection authorities upon request)

### III. Access to data and data security measures

#### III. 1. Data access and data transfer

In addition to the obligation of confidentiality, personal data may be accessed by employees of the Company whose access is absolutely necessary for the performance of their tasks and duties.

#### The company that operates and manages the website:

G-Sound Ltd., registered office: 9012 Győr, Öreg street 24/B, company registration number: 08 09 026455 representative: Gricz József, e-mail address: griczjosef@gsound.hu

#### III. 2. Data security measures

The Company uses appropriate IT, technical and personnel measures to protect the personal data it manages against, among other things, unauthorized access, transmission or alteration.

### IV. Az érintett adatkezeléssel kapcsolatos jogai

You, as a person involved in the management of personal data at our Company, have the right to contact us via the contact details listed in point I

a) request access to your personal data from our Company,

within this, that your personal data is being processed at our Company, and if so, you are entitled to be informed that

- which personal data is processed, on which legal basis, for which data management purpose, from which source, for how long;

- furthermore, to whom, when, for what purpose, on what legal basis, and to which personal data did our Company grant access or forward your data; *The Company will provide you with*

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<sup>2</sup>Article 6 (1) GDPR point c) and Sec. Section 17 (7)

*this information free of charge for the first time, after which it may charge a reasonable fee based on administrative costs.*

*In order to protect the rights and personal data of the data subjects and to ensure the data security obligation, the Company is obliged to make sure that the identity of the person wishing to assert their right of access matches the identity of the data subject. Based on this, the provision of information, access to the data and the issuance of a copy thereof is subject to the personal identification of the applicant.*

to request the addition or correction of your personal data in writing, at the same time as providing credible proof of the accuracy of the data to be supplemented or corrected;

a) to request the deletion of II.1. with regard to the data management included in point, i.e. to withdraw your consent at any time without limitation or justification. The revocation does not affect the legality of data processing carried out before the withdrawal of consent. The withdrawal can be done by sending the Company's contact details given in point I. In this case, the Company will immediately delete all personal data from its records, which it will confirm to the person concerned electronically or by post.

You also have the right to deletion in the following cases:

- based on your point of view, you no longer need the personal data for the purpose for which they were collected or otherwise handled,
- if you object to data processing (see IV. f)) and there is no overriding legal reason for data processing.

The Company cannot provide the right to deletion in cases where data management is necessary for the purpose of legal obligations or for the presentation, enforcement or defense of legal claims.

b) request the blocking of your personal data (right to restrict data processing), during which the Company must clearly indicate the nature of the restriction and separate it from other data, if you, as the person concerned:

- disputes the accuracy of your personal data (in this case, the restriction lasts until the Company checks the accuracy of your personal data),
- the data management is illegal and the data subject opposes the deletion of the data and instead requests the restriction of their use;
- the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to submit, enforce or defend legal claims; obsession
- You objected to data processing (in this case, the restriction applies to the period until it is determined whether the Company's legitimate reasons take precedence over your legitimate reasons).

c) You have the right to receive your personal data in a segmented, widely used, machine-readable format or to transmit it to another data controller (right to data portability).

With respect to the data processing included in the other points, the data subject is not entitled to the right to data portability, taking into account its legal basis.

If you use your rights detailed so far and contact our Company in writing, our Company will respond to your request within 25 days at the contact information provided by you. The date of receipt of the application is not included in the deadline.

#### **V. Legal enforcement options related to data management**

If you consider that the Company has violated the applicable data protection provisions when handling your personal data, then

a) You have the right to submit a complaint to the supervisory authority (National Data Protection and Freedom of Information Authority, <http://naih.hu>, phone number: +36 (1) 391-1400, postal address: 1530 Budapest, Pf.: 5., e-mail : [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). If you are a foreign citizen, you can also file a complaint with the supervisory authority of your place of residence.

b) In case of violation of your rights, you can go to court. The court acts out of sequence in the case. Adjudication of data protection lawsuits falls under the jurisdiction of the court, the lawsuit can be initiated - according to your choice - before the court competent for your residence or place of stay, or the seat of the Company. You can find the court according to your place of residence or stay at <http://birosag.hu/ugyfelkapcazzolati-portal/birosag-kereso>. According to the seat of the Company, the Győr Court has jurisdiction over the lawsuit.

Regarding the management of personal data, the main governing legislation is Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the protection of natural persons with regard to the management of personal data and on the free flow of such data, as well as 95/46 /EC on the repeal of the directive (general data protection regulation, GDPR), and CXII of 2011 on the right to informational self-determination and freedom of information. law (Infotv.).

The data controller is entitled to unilaterally modify this data management information at any time. The data controller publishes the data management information, its amendment, the data management information contained in a uniform structure with the amendments, on the website, under the menu item Data management information, and makes it continuously available.

The amendments will enter into force on the date specified in the notification. If the legal basis for data processing is the data subject's consent, and the modification of the data processing materially affects the data processing, the data controller requests the data subject's repeated consent to data processing.

The data manager does not check the personal data provided to him. The person providing the data is solely responsible for the adequacy of the data provided.

#### **VI. The data processors**

The data controller uses different companies to manage and store your data. The following data processors process your data:

Name and address of data processor Purpose of data processing

EV2 Internet Kft. 1149 Budapest, Róna street 120-122 purpose: Hosting

Google LLC. (USA, Google Data Protection Office, 1600 Amphitheater Pkwy Mountain View, California 94043 - Google Analytics) purpose: Google Analytics service

Among the data processors used, Google LLC is a data processor based in the USA, listed in the European Commission's compliance decision pursuant to Article 45 of the GDPR and in the Commission's implementing decision 2016/1260, as well as on the USA - EU Privacy Shield List established based on these, i.e. the data transfer does not qualify as data transfer to a third country outside the European Union and does not require a separate permission from the data subjects, and data transfer there is permitted based on Article 45 of the GDPR. These companies have undertaken to comply with the GDPR.

The data controller is not obliged to appoint a data protection officer.

Transmission of personal data

Personal data will not be forwarded to third parties, to a third country or to an international organization - with the exception of those public bodies defined in legislation or in the mandatory legal act of the European Union, which require personal data from the data controller for their investigations in individual cases - beyond what is described in this point.

## **VII. Data management related to cookies**

### **LEGAL BASIS FOR PROCESSING PERSONAL DATA**

The legal basis for data management is Article 6 (1) of the GDPR. a) the consent of the person affected by the data management.

The data subject gives consent to the processing of the data as follows:

Cookie settings are enabled on the website for the best user experience. If the website is used without changing the settings, or if the "Accept" button is clicked, the user accepts the use of cookies.

Withdraw consent to data management:

– You can block the use of cookies by setting the browser software accordingly. Information on browser settings is available by clicking on the following link:

Mozilla Firefox

<https://support.mozilla.org/en-US/kb/introducing-total-cookie-protection-standard-mode>

Google Chrome

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Internet Explorer

<https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

– You can also prevent the collection and use of data by Google (cookies and IP address) by downloading and installing the browser plug-in available at the following link:<http://tools.google.com/dlpage/gaoptout?hl=en>

On the website, the data manager uses cookies in order to understand the needs and behavior of users related to the website and to develop the website based on them, and to prepare anonymous statistics on website visits. Some small programs help users not have to re-enter their identification data at the next login, and their identification is easier and faster, while other programs serve to identify users. The data manager uses the following cookies on the website:

#### **A cookie\_notice\_accepted:**

It is placed in the browser after the user has interpreted and accepted [www.gsound.hu](http://www.gsound.hu) website uses cookies warning. Service provider: Webflow plugin (EU Cookie Law plugin).

#### **Google Analytics sütijei:**

An external service provider (Google) assists in the independent measurement of website visitation and other web analytics data (Google Analytics).

Google Analytics cookies enable the analysis of the user's website visits. The information generated by the cookie about the user's visit to the website is usually sent to a Google server in the United States and stored there. Google shortens the user's IP address, but only in member states of the European Union or in other countries of the Agreement on the European Economic Area. Only in exceptional cases will the entire IP address be sent to a Google server in the USA and shortened there. On behalf of the website operator, Google will use this information to evaluate the user's use of the website and compile reports on the activities carried out on the website, as well as to offer the website operator additional services related to the use of the website and the Internet. The IP address transmitted by your browser is not linked by Google with other Google data. You can block the use of cookies by setting your browser software accordingly. You can also prevent the collection and use of data by Google (cookies and IP address) by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>

Instead of the plug-in or on the browsers of mobile devices, click on this link to install a blocking cookie, which will further prevent the collection of data within the framework of Google Analytics on this website. The blocking will remain in effect until you delete its cookie. If the cookie has been deleted, all you have to do is click the link again. Further information on the terms of use and data protection policy of Google Analytics can be found on the following pages:<https://www.google.com/analytics/terms/us.html>

<https://www.google.com/privacy?hl=en-GB>

About the management of measurement data by Google LLC. can provide detailed information, whose availability: <https://www.google.com/analytics>.

### **Google Search Console**

Search Console is a free service from Google, with the help of which a data controller can monitor, maintain and improve the presence of his website in Google Search results. With the help of Search Console, a data controller can get a more comprehensive picture of how Google sees a website and can improve it. The Google Search Console cookie does not collect or manage personal data.

The data manager processes the following personal data in relation to cookies for the following purpose and for the period specified here:

**Name of the cookie : cookie\_notice\_accepted**

Category: Required

Managed personal data: IP address

Purpose of data management: Registering the user's use of cookies, making visiting the website more convenient

Shelf life: 7 days

**Name of the cookie: Google Analytics**

Category: Optional

Managed personal data: IP address country, browser used, device and operating system type and version number, language settings, time of visit

Purpose of data management: Compilation of statistics, website development, user identification and recognition

Retention period: Until consent is revoked

**Name of the cookie: Google Search Console**

Category: Optional

Managed personal data: Does not manage personal data

Purpose of data management: Creation of statistics, website development, user identification and recognition

Retention period: Until consent is revoked