Privacy Policy

Who are we

Our website address is: https://www.alvinshop.hu/

Name: Alvin Trading Ltd.

Address: 2092 Budakeszi, Cserszegi u 12.

Tax number 25340365-2-41 Email: aruhaz@alvin-ltd.com Phone: 0036-23-445-510

Our services Website

Visits to our website are logged for security reasons (IP address, pages viewed). We use Google Analytics to track what you are looking for in order to produce more and more interesting content for you (cookies). Facebook and Google AdWords cookies are placed in your browser, you can see ads through these providers later.

What is the personal information we collect and for what purpose

We respect your rights, and we will try to fulfill your requests within the deadlines set by law. We treat your information the way we expect others to handle our own information.

We take care of your data, move it over encrypted channels and never sell it to anyone else, never use it for any purpose other than what you provided it for.

We have a website, we measure its use, we log for security reasons, we have online marketing with targeted campaigns, we manage your data.

If you request, we will release your information after identification. If you request, we will delete your data.

Contact forms

The information received on the contact form (Name, Email, Telephone number) is collected for contact purposes only and we do not use this information for marketing purposes. If you request, we will delete your data.

Consent to the handling of my personal data

I give my voluntary and express consent to the management of the data provided during the visit to the electronic interfaces of the website (website, Facebook ads, AdWords ads), registration.

At the same time as recording my data, I declare that I am a person of legal age who has reached the age of 18. I represent a legal entity or other organization without legal personality, and the person I represent or I am the authorized person to represent the organization and to give the necessary consent for the data management and data processing according to this prospectus.

I declare that I will not provide any special personal data in any form, either during registration or later. Special personal data includes, but is not limited to, racial or ethnic origin; political opinions; religious

and worldview beliefs; trade union membership; genetic or biometric data that can be used to identify a person; health data or data related to sexual life or sexual orientation.

I declare that I will not provide a personally identifiable number - non-exhaustive examples: passport number, personal number, identity card number, address card serial number, license serial number.

With my consent, I acknowledge that **Alvin Trading Ltd**. can send me letters, brochures, event invitations related to its field of activity and search by phone.

I may withdraw my consent to the processing of my data at any time by sending a request to the address provided in the information, for example to $\underline{\text{aruhaz@alvin-ltd.com}}$

Your rights

The following rights apply. We must respond to your request in accordance with the GDPR within a maximum of 1 month. We will do our best to respond much sooner than this.

Right to information

You can ask us to provide information about the personal information we handle. You can request access to this data.

You can request information in writing at any time by registered letter with acknowledgment of receipt sent to our address or by email sent to our e-mail address at the office. A request for information sent by letter will be considered authentic if we can clearly identify it based on the request sent.

A request for information sent by e-mail will only be considered authentic if you send it from your registered e-mail address, but this does not preclude us from identifying you in another way for security reasons before providing the information.

The request for information may cover the data we process, their source, the purpose, legal basis, duration, names and addresses of any data controllers, activities related to data processing and, if personal data is transferred, who received or will receive your data.

Right of access

If you request that we inform you whether your Personal Data is being processed, you may have access to the purpose of the data processing, data categories, recipients, data retention period, data subject rights, remedies, data source, automated decision-making, foreign data transfer.

Right of rectification

You can request the correction or modification of your Personal Data at any time in writing by registered letter with acknowledgment of receipt sent to our address or by e-mail sent to our official e- mail address. Taking into account the purpose of data management, you can request the completion of incomplete Personal Data.

Right to cancel

You can request the deletion of your Personal Data processed by us. Deletion may be refused (i) for the purpose of exercising the right to freedom of expression and information, or (ii) if the processing of Personal Data is in the public interest (authorized by law); and (iii) in a reasonable private interest (to bring, assert, or defend legal claims).

In all cases, we will inform you of the refusal of the cancellation request, indicating the reason for the refusal of the cancellation. Once the request for deletion of personal data has been fulfilled, the previous (deleted) data can no longer be recovered.

Newsletters can be unsubscribed via the unsubscribe link in them.

Right to restrict data processing

You may request that we restrict the processing of your Personal Data if you dispute the accuracy of the Personal Data processed. In this case, the restriction applies to the period of time that allows us to verify the accuracy of the Personal Data.

We will flag the Personal Data we process if you dispute its correctness or accuracy, but the inaccuracy or inaccuracy of the disputed Personal Data cannot be clearly established.

You may request that we restrict the processing of your Personal Data even if the Data Processing is illegal, but you object to the deletion of the Personal Data being processed and instead request a restriction on their use.

You may exercise this right even if the purpose of the Data Management has been achieved, but you require the processing of your data in order to submit, enforce or protect legal claims.

If you object to the processing of your data, we will restrict the processing of your Personal Data for the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

The right to data portability

You may request that the Personal Data you provide to us and which you process in an automated manner be provided to you in a structured, widely used machine-readable format (XML / XLS / CSV) and / or transferred to another data controller.

Right to protest

You may object to the processing of your Personal Data (i) if the processing of your Personal Data is necessary solely to fulfill a legal obligation to us or to enforce our legitimate interests; (ii) if the purpose of the Data Management is direct business acquisition, public opinion research or scientific research; or (iii) if the Data Processing is for the performance of a task in the public interest.

We will review the legality of the protest and, if the protest is substantiated, we will terminate the Data Processing and block the Personal Data processed, and we will notify all those to whom the Personal Data affected by the protest was previously transmitted of the protest and the action taken on it.

Purpose of data management

Protecting your rights

Your identification is for keep in touch with you.

Customize marketing messages are to provide targeted, relevant messages based on your area of interest.

Creation of services, service quality and security conditions undertaken in general terms and conditions.

Compliance with our legal obligations. Enforcing our legitimate business interests. Managed data

We process the information you provide:

Name E-mail

phone number

Billing address, location

We log data for security reasons:

Page / function viewed

Exact time IP address

Browser cookies

We build a profile for marketing purposes:

What problem are you looking for a solution to? What services are you interested in?

Profile construction is based on the data you provide. Our goal is to find the messages that are really interesting and relevant. Nor do we like to receive general messages that are not for us.

Web analytics on the website

Please note that we use Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing to measure traffic to https://www.alvinshop.hu/en/ and monitor visitor behavior, generate statistics, and track the performance of your ads

The referenced programs in your browser are called Cookies are placed that store unique user IDs. As a visitor to the website, you authorize the use of Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing programs. At the same time, you contribute to monitoring and following your behavior and using all the services provided by the programs.

In addition, you have the option to disable the recording and storage of cookies for future reference at any time, as described below. Please be advised that the settings and use of Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing fully comply with the requirements of the Privacy Authority.

According to Google, Google Analytics mainly uses visitor-generated cookies to report visitor interactions on your site. These cookies only store non-personally identifiable information. Browsers do not share their own cookies between domains. You can find more

information about cookies in the Google Advertising and Privacy FAQ.

Google Analytics

We primarily use Google Analytics to generate statistics for you, including measuring the performance of your campaigns. Using the program, we obtain information about how many visitors visited the website and how much time the visitors spent on the website. The program recognizes the visitor's IP address, so it can track whether the visitor is a return or a new visitor, as well as track what path the visitor has taken on the Website and where they have entered.

Google AdWords Conversion Tracking

The goal of Google AdWords conversion tracking is to help the salon measure the effectiveness of AdWords ads. It does this using cookies placed on the User's computer that last for 30 days.

Disable cookies

If you want to manage the cookie settings or disable the feature, you can do so in your own browser. This option can be found in the Cookies / Cookies / Tracking Placements menu, depending on your browser toolbar. In general, you can set what tracking features you want to enable / disable on your computer under Tools> Options> Privacy Settings.

If you don't want Google Analytics to report on your visits, you can install the Google Analytics disabled browser extension. This addon instructs Google Analytics JavaScript not to send visit information to Google. If you've installed the blocking browser extension, you won't be participating in content experiments.

To disable Google Analytics web activity, visit the Google Analytics Disable page and install the extension for your browser. For more information about installing and uninstalling the extension, see the help for your browser.

Principles of data management

The Data Controller handles the Personal Data in accordance with the principles of good faith and fairness and transparency, as well as the provisions of applicable law and this Prospectus.

The Personal Data necessary for the use of the Services is used by the Data Controller with the consent of the User concerned and only for the intended purpose.

The Data Controller may use the Personal Data only in this Prospectus or for the purpose specified in the relevant legislation. The scope of the processed Personal Data is proportional to the purpose of data management and may not extend beyond it (data saving).

We do not process the Personal Data of a person under the age of 18.

The Data Controller will not transfer the Personal Data managed by it to third parties other than the External Service Providers specified in this Prospectus and in certain cases referred to in this Prospectus. An exception to the provision contained in this section is the use of data in a statistically aggregated form, which may not contain other data suitable for the identification of the relevant User in any form, thus it does not qualify as Data Management or data transmission.

In certain cases, the Data Controller - due to a formal court or police request, legal proceedings due to copyright, property or other infringements or a reasonable suspicion thereof, violation of the Data Controller's interests, endangering the provision of the Services, etc. - make the available Personal Data of the relevant User available to third parties.

The Data Management System may collect data on the activity of the Users, which may not be combined with other data provided by the Users during registration, or with data generated when using other websites or services.

The Data Controller shall inform about the correction or restriction of the Personal Data managed by it. the User concerned, as well as all those who have previously been

You have transferred personal data for data management purposes. The notification may be omitted if it does not infringe the legitimate interest of the data subject with regard to the purpose of the Data Management.

The Data Controller ensures the security of the Personal Data, takes the technical and organizational measures and establishes the procedural rules that ensure that the recorded, stored and processed data are protected, and prevent their accidental loss, unauthorized destruction, unauthorized access, unauthorized use and unauthorized alteration or distribution. To fulfill this obligation, the Data Controller invites all third parties to whom it transmits Personal Data.

Subject to the relevant provisions of the GDPR, the Data Controller is not obliged to appoint a Data Protection Officer.

The Data Controller is responsible for compliance with the principles.

Confidential data management

The recorded data will be treated confidentially and every effort will be made to ensure the security of the data and to use it in the manner necessary for the proper functioning of the Website. This includes, but is not limited to, sending emails and text messages to you and the contact information you provide, in which case the message will be sent through your service provider.

We will never sell or lend your personal information to third parties for marketing purposes. If necessary, we may provide your personal data and other relevant information in a subpoena, court order or legal proceeding.

Access to personal data by our employees

We provide our employees with access to the personal data we handle, which is absolutely necessary for the work. All accesses are logged, only very limited access to the data backup function is provided.

data transmission

We are entitled and obliged to transfer to the competent authorities all Personal Data in its possession and duly stored by us, which is obliged to transfer Personal Data by law or a final official obligation. The Data Controllers cannot be held liable for such data transfer and the consequences thereof.

If we transfer the operation or utilization of our service to a third party in whole or in part, we may transfer the Personal Data we handle in whole or in part to that third party without your prior consent, but we may transfer it to the new operator without prior notice. in a more unfavorable position than the data management rules specified in the text of this Prospectus in force at any time. In

the event of a transfer under this paragraph, we will provide you with the opportunity to object to the transfer prior to the transfer. In the event of a protest, it is not possible to transfer your data in accordance with this section.

In order to check the lawfulness of the data transfer and to inform the data subject, the data controller shall keep a data transfer register containing the date of transfer of personal data processed by him, the legal basis and recipient of the transfer, the definition of the transferred personal data and other data specified by law.

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Update information, follow changes in legislation

The Prospectus is constantly reviewed and updated by the data controller in accordance with changes in the legal environment and regulatory requirements. The User may be informed about the current Prospectus under the "Data Management Information" section of the website.

Additional questions / answers

You can request information on data management and/or processing at any time by sending an email to $\underline{aruhaz@alvin-ltd.com}$