

Privacy Policy

Date of adoption: 06/01/2021

Data controller

Name: Pharmarosa Kft.

Head office: 1188 Budapest Ültetvény utca 8.

Mailing address, complaint handling: 1239 Budapest Ócsai út 2.

Email: info@pharmarosa.com

Phone number: 0612876380

Website: http://www.pharmarosa.com

Hosting provider

Name: Netteszt Informatikai Kft.

Mailing address: 2013 Pomáz, Deák Ferenc u. 2.

E-mail address: info@netteszt.hu

Phone number: + 36-1-445-0999

Description of the data management performed during the operation of the webshop

Information on the use of cookies

What is a cookie ?

The Data Controller uses so - called cookies when visiting the website . The information package consisting of cookie letters and numbers that our website sends to your browser for the purpose of saving certain settings, facilitating the use of our website and helping to collect some relevant, statistical information about our visitors.

Some cookies do not contain personal information and are not suitable for identifying an individual user, but some contain a unique identifier - a secret, randomly generated sequence of numbers - that your device stores, thus ensuring your identification. Each cookie -k (cookies) operating duration of each cookie contains the description for k (cookies).

The cookie s mandate and the legal basis:

The legal basis for data processing under Article 6 (1) (a) of the Regulation is your consent.

The main features of the cookies used by the website are:

Google Analytics cookie : Google Analytics is Google's analytics tool that helps website and application owners gain a more accurate picture of their visitors 'activities. The Service may use cookies to collect information and report on statistics about your use of the Website without individually identifying visitors to Google. The main cookie used by Google Analytics is the "__ga " cookie . In addition to reporting from site usage statistics, Google Analytics , along with some of the advertising cookies described above , can also be used to show more relevant ads on Google products (such as Google Search) and across the web.

Session cookie : These cookies store the visitor's location, browser language, payment currency, lifetime when the browser is closed, or up to 2 hours.

Basket Cookie : Records the products placed in the basket. Shelf life 365 days.

Facebook pixels (the Facebook cookie) Facebook-pixel code, for which the report is using the website conversions, audiences can be assembled, and the site owner receives a detailed analysis using data from the website visitors. With the help of the Facebook pixel, you can display personalized offers and advertisements to the visitors of the website on the Facebook interface. You can read Facebook's privacy policy here: <https://www.facebook.com/privacy/explanation>

If you do not accept the use of cookies, certain features will not be available to you. You can find more information about deleting cookies at the following links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Mozilla: <https://support.mozilla.org/en/kb/websites-search-placed-sutik-torlese-szamito>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Chrome: <https://support.google.com/chrome/answer/95647>
- Edge: <https://support.microsoft.com/en-us/help/4027947/microsoft-edge-delete-cookies>

Data processed for contracting and performance purposes

Several data management cases may be implemented for the conclusion and performance of the contract. We would like to inform you that data processing related to complaint handling and warranty administration will only take place if you exercise one of these rights.

If you do not make a purchase through the webshop, you are only a visitor to the webshop, then what is written in the data management for marketing purposes may apply to you, if you give us consent for marketing purposes.

Data processing for the conclusion and performance of contracts in more detail:

Contact

For example, if you contact us by email, contact form, or phone with a question about a product. Pre-contact is not mandatory, you can order it from the webshop at any time.

Information

managed

The **information** you provided during the contact: Name, Address, E- mail address, Phone number

Duration of

data management

The data is stored until revoked.

Legal

basis

for

data

management

Your voluntary consent, which you give to the Data Controller by contacting us. [Data processing pursuant to Article 6 (1) (a) of the Regulation]

Registration on the website

By storing the data provided during registration, the Data Controller can provide a more convenient service (eg the data of the data subject does not have to be entered again when purchasing again). Registration is not a condition for concluding a contract.

Data

managed

During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase.

Duration of
The data is stored until revoked.

data management

Legal basis for data processing
Your voluntary consent to the Data Controller through registration [Data processing under Article 6 (1) (a) of the Regulation]

Order processing

During the processing of orders, data management activities are required in order to fulfill the contract.

Managed data
During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product, the order number, the account number and the date of purchase.

If you have placed an order in the webshop, data management and the provision of data is essential for the fulfillment of the contract.

Duration of
The data is stored until revoked.

data management

Legal basis for data management
Performance of the contract. [Data processing pursuant to Article 6 (1) (b) of the Regulation]

Issuance of the invoice

The data management process is carried out in order to issue an invoice in accordance with the law and to fulfill the obligation to keep accounting documents. The Stv. Pursuant to Section 169 (1) - (2), companies must keep the accounting document directly and indirectly supporting the accounting.

Managed data
During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product, the order number, the account number and the date of purchase.

Duration of data management
The issued invoices are issued in accordance with the Act. Pursuant to Section 169 (2), it must be retained for 8 years from the date of issue of the invoice.

Legal basis of data management
Act CXXVII of 2007 on VAT. Pursuant to Section 159 (1), the issue of an invoice is mandatory and must be kept for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting [Data Management pursuant to Article 6 (1) (c) of the Decree].

Freight data management

The data management process takes place in order to deliver the ordered product.

Data managed
During data management, the Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase.

Duration of
The data is stored until revoked.

data management

Legal basis for data processing Performance of the contract [**Data processing** pursuant to Article 6 (1) (b) of the Regulation].

Recipients and data processors of data processing related to freight transport

Name of the consignee: GLS General Logistics Systems Hungary Csomag-Logistikai Kft.

Address of the addressee: 2351 Alsónémedi, GLS Európa u. 2.

Recipient's telephone number: 06-29-88-67-00

Recipient's email address is info@glh-hungary.com

The recipient's website: <https://glh-group.eu/HU/hu/home>

The courier service participates in the delivery of the ordered goods on the basis of the contract concluded with the Data Controller. The courier service handles the received personal data in accordance with the data management information available on its website.

Name of the consignee: DPD Hungária Kft.

Address of the addressee: 1158 Budapest, Késmárk utca 14. B. ép.

Recipient's telephone number: + 36-1 / 501-6200

Recipient's e-mail address: dpd@dpd.hu

Recipient's website: <https://www.dpd.com/hu/>

The courier service participates in the delivery of the ordered goods on the basis of the contract concluded with the Data Controller. The courier service handles the received personal data in accordance with the data management information available on its website.

Handling warranty and guarantee claims

The warranty and guarantee claims are set out in Decree 19/2014. (IV. 29.) NGM decree, which also determines how we should handle your claim.

Managed data
During the data management, the Data Controller will use your name, address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase, respectively. handles the subject of the complaint.

Duration of data processing
The company is obliged to keep the record of the consumer's warranty or guarantee claim for three years from the time of its collection and to present it at the request of the audit authority.

Legal basis of data management The **legal basis** of data management is 19/2014. (IV. 29.) NGM decree [4. § (1) and § 6 (1)] [data processing pursuant to Article 6 (1) (c) of the Decree].

Handling of other consumer complaints

The data management process is in place to handle consumer complaints. If you have made a complaint to us, data management and the provision of data is essential.

Managed

data

During the data management, the Data Controller will use your name, address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase, respectively. handles the subject of the complaint.

Duration

of

data

processing

Warranty complaints are kept for 5 years in accordance with the Consumer Protection Act.

Legal

basis

for

data

management

Whether you have a complaint about your voluntary decision, however, if you do contact us, you are covered by the CLV 1997 on consumer protection. Act 17 / A. § (7), we are obliged to keep the complaint for 5 years [data processing according to Article 6 (1) c) of the Decree].

Data management for marketing purposes

Data management related to newsletter sending

The data management process is done to send out newsletters.

Managed

data

Customer's name, address, e-mail address, telephone number.

Duration

of

data

processing

Until

the

data

subject's consent is withdrawn.

Legal

basis

for

data

processing

Your voluntary consent to the Data Controller by subscribing to the newsletter [Data processing under Article 6 (1) (a) of the Regulation]

Additional data management

If the Data Controller wishes to perform further data processing, he / she shall provide preliminary information on the essential circumstances of the data management (legal background and legal basis of data management, purpose of data management, scope of data processed, duration of data management).

We would like to inform you that the Data Controller must comply with the written data requests of the authorities based on legal authorization. The Data Controller shall inform Infotv . In accordance with Section 15, Paragraphs (2) - (3), it keeps records (to which authority, what personal data, on what legal basis, when was transmitted by the Data Controller), the content of which the Data Controller provides on request, unless its disclosure is excluded by law.

Recipients of personal data

Data processing for the storage of personal data

Name of the data processor: Netteszt Informatikai Kft.

Contact details of the data processor:

Phone number: + 36-1-445-0999

E-mail address: info@netteszt.hu

Headquarters: 2013 Pomáz, Deák Ferenc u. 2.

Website: <https://netteszt.hu/>

The Data Processor stores personal data on the basis of a contract concluded with the Data Controller. You are not entitled to access personal data.

Data processing activities related to newsletters

Name of the company operating the newsletter system: Pharmarosa Database

Headquarters of the company operating the newsletter system: 1188 Budapest Ültetvény utca 8.

Phone number of the company operating the newsletter system: 0612876380

E-mail address of the company operating the newsletter system: info@pharmarosa.com

Website of the newsletter company:

The Data Processor participates in the sending of newsletters on the basis of a contract concluded with the Data Controller. In doing so, the Data Processor manages the name and e-mail address of the data subject to the extent necessary for sending the newsletter .

Accounting data management

Name of the data processor: Tax & Recording Hungary Kft.

Registered office of the data processor:

Phone number of the data processor:

E-mail address of the data processor: oryzsolt@oryzsolt.hu

Website of the data processor:

The Data Processor participates in the accounting of the accounting documents on the basis of a written contract concluded with the Data Controller . In doing so, the Data Processor shall provide the name and address of the data subject to the extent necessary for the accounting records, in accordance with the Civil Code. It shall be managed for a period in accordance with Section 169 (2), after which it shall be canceled immediately.

Invoicing data processing

Name of the data processor: KBOSS.hu Kft./ Számlázz.hu

The registered office of the data processor: 1031 Budapest, Záhony utca 7.

Telephone number of the data processor : + 3630 35 44 789

The e-mail address of the data processor: info@szamlazz.hu

Website of the data processor :

The Data Processor participates in the registration of accounting documents on the basis of a contract concluded with the Data Controller. In doing so, the Data Processor shall provide the name and address of the data subject to the extent necessary for the accounting records, in accordance with the provisions of the Act. It shall be managed for a period of time in accordance with Section 169 (2), after which it shall be canceled.

Data processing related to the operation of a CRM system

Name of the data processor: Pharmarosa Kft.

The registered office of the data processor: 1188 Budapest Ültetvény utca 8.

The telephone number of the data processor is 0612876380

The e-mail address of the data processor is info@pharmarosa.com

Website of the data processor:

The Data Processor participates in the registration of orders on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor handles the name, address, telephone number, number and date of orders of the data subject within the civil law limitation period.

Data processing related to online payment

Name of the data processor: OTP Bank Plc.

The registered office of the data processor: 161 Budapest, Nádor utca 16.

Phone number of the data processor : 06 -1-473-5000

E-mail address of the data processor:

Website of the data processor:

The Data Processor participates in the execution of the Online Payment on the basis of the contract concluded with the Data Controller. In doing so, the data processing concerned the billing name names manages and address, number and date of the order in the civil limitation period.

Your rights during data management

Within the period of data processing, you have the following rights in accordance with the provisions of the Decree:

- the right to withdraw consent
- access to personal data and data management information
- right of rectification
- restrictions on data management,
- right of cancellation
- the right to protest
- the right to portability.

If you wish to exercise your rights, this will involve your identification and the Data Controller must communicate with you. Therefore, you will be required to provide personal information for identification purposes (but identification may only be based on data that the Data Controller handles about you anyway) and your data management complaints will be available in the Data Controller's email account within the timeframe specified in this information. If you have been our customer and would like to identify yourself for complaint or warranty purposes, please also provide your order ID for identification. Using this, we can also identify you as a customer.

Complaints related to data management will be answered by the Data Controller within 30 days at the latest.

Right to withdraw consent

You have the right to withdraw your consent to data management at any time, in which case the data provided will be deleted from our systems. However, please note that in case of an unfulfilled order, the cancellation may result in us not being able to deliver to you. In addition, if the purchase has already been made, we will not be able to delete your billing information from our systems in accordance with the accounting rules, and if you owe us, we may process your information in the event of withdrawal of consent based on a legitimate interest in recovering the claim.

Access to personal data

You have the right to receive feedback from the Data Controller as to whether your personal data is being processed and, if data is being processed, you have the right to:

- have access to the personal data processed and
- inform the Data Controller of the following information:
 - the purposes of data management;
 - categories of personal information processed about you;
 - information on the recipients or categories of recipients with whom or with whom the Personal Data has been or will be communicated by the Data Controller;
 - the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period;
 - your right to request the Data Controller to rectify, delete or restrict the processing of personal data concerning you and to object to the processing of such personal data in the event of data processing based on a legitimate interest;
 - the right to lodge a complaint with the supervisory authority;
 - if the data was not collected from you, all available information about their source;
 - the fact of automated decision-making (if such a procedure has been used), including profiling, and, at least in these cases, understandable information on the logic used and the significance of such data processing and the expected consequences for you.

The purpose of exercising the right may be to establish and verify the lawfulness of the data processing, therefore in case of multiple requests for information, the Data Controller may charge a fair fee for the provision of the information.

Access to personal data is ensured by the Data Controller by sending you the processed personal data and information by e-mail after your identification. If you have a registration, we will provide access so that you can view and verify the personal information we manage about you by logging into your user account.

Please indicate in your request whether you are requesting access to personal data or requesting data management information.

Right to rectification

You have the right, at the request of the Data Controller, to correct inaccurate personal data concerning you without delay.

Right to restrict data management

You have the right, at the request of the Data Controller, to restrict data processing if any of the following is met:

- You dispute the accuracy of the personal data, in which case the restriction applies to the period of time that allows the Data Controller to check the accuracy of the personal data, if the exact data can be established immediately, the restriction will not take place;
- the data processing is illegal, but you object to the deletion of the data for any reason (for example, because the data is important to you in order to enforce a legal claim), so you do not request the deletion of the data, but instead request a restriction on its use;
- the Data Controller no longer needs the personal data for the purpose of the designated data processing, but you request it in order to submit, enforce or protect legal claims; obsession

- You have objected to the data processing, but the data controller's legitimate interest may also justify the data processing, in which case until the data controller's legitimate reasons take precedence over your legitimate reasons, the data processing must be restricted.

Where data processing is restricted, such personal data may be processed, with the exception of storage, only with the consent of the data subject or for the purpose of bringing, enforcing or protecting legal claims or protecting the rights of another natural or legal person or in the important public interest of the Union or a Member State.

The data controller will inform you in advance (at least 3 working days before the lifting of the restriction) about the lifting of the data management restriction.

Right to delete - right to forget

You have the right to have the Data Controller delete your personal data without undue delay if any of the following reasons exist:

- personal data are no longer required for the purpose for which they were collected or otherwise processed by the Data Controller;
- You withdraw your consent and there is no other legal basis for the processing;
- You object to the processing based on a legitimate interest and there is no overriding legitimate reason (ie a legitimate interest) in the processing,
- the personal data was processed unlawfully by the Data Controller and this was established on the basis of the complaint,
- personal data must be deleted in order to fulfill a legal obligation under Union or Member State law applicable to the Controller.

If, for any lawful reason, the Data Controller has disclosed personal data processed about you and is obliged to delete it for any of the reasons set out above, it shall take reasonable steps, including technical measures, to inform the data, taking into account available technology and implementation costs. other data controllers that you have requested the deletion of the links to the personal data in question or of a copy or duplicate of this personal data.

Deletion does not apply if data processing is required:

- for the purpose of exercising the right to freedom of expression and information;
- to fulfill an obligation under EU or Member State law to process personal data (such as data processing in the context of invoicing, as the retention of the account is required by law) or in the public interest or in the exercise of a public authority conferred on the data controller;
- to submit, enforce or defend legal claims (eg if the Data Controller has a claim against you and has not yet fulfilled it, or a consumer or data processing complaint is being processed).

Right to protest

You have the right to object at any time to the processing of your personal data on the basis of a legitimate interest for reasons related to your own situation. In this case, Controller of personal data can not manage on, unless it proves that the data processing of coercive force is justified by legitimate reasons that take precedence over your interests, rights and freedoms of or are related to the presentation, exercise or defense of legal claims.

If your personal data is processed for the purpose of direct business acquisition, you have the right to object at any time to the processing of personal data concerning you for this purpose, including profiling, insofar as it relates to direct business acquisition. If you object to the processing of personal data for the purpose of direct business acquisition, the personal data may no longer be processed for this purpose.

Right to portability

If the data processing is carried out automatically or if the data processing is based on your voluntary consent, you have the right to ask the Data Controller to receive the data provided by you to the Data Controller, which the Data Controller provides to you in xml , JSON or csv format. if this is technically feasible, it may request that the Data Controller transfer the data in this form to another data controller.

Automated decision making

You have the right not to be covered by a decision (including profiling) based solely on automated data processing that would have legal effect on you or affect you to a similar extent. In such cases, the Data Controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention on the data subject, to express his or her views and to object to the decision.

The above does not apply if the decision:

- Necessary for the conclusion or performance of a contract between you and the data controller;
- is governed by EU or Member State law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; obsession
- based on your express consent.

Login to the privacy register

The Infotv . Pursuant to the provisions of the Act, the Data Controller had to notify certain data processing operations to the data protection register. This notification obligation was terminated on May 25, 2018.

Data security measures

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, and becoming inaccessible due to changes in the technology used.

The Data Controller will make every effort to ensure that its data controllers also take appropriate data security measures when working with your personal data.

Remedies

If, in your opinion, the Data Controller has violated any legal provision on data processing or has not complied with any of its requests, the National Data Protection and Freedom of Information Authority may initiate an investigation procedure to terminate the alleged unlawful data processing (mailing address: 1363 Budapest, Pf. 9., e-mail : ugyfelszolgalat@naih.hu).

We would also like to inform you that in case of violation of the legal provisions on data processing, or if the Data Controller has not complied with any of his / her requests, he / she may file a civil lawsuit against the Data Controller in court.

Modification of data management information

The Data Controller reserves the right to amend this data management information in a manner that does not affect the purpose and legal basis of the data management. By using the website after the change takes effect, you accept the amended data management information.

If the Data Controller wishes to perform further data processing in connection with the collected data for a purpose other than the purpose of their collection, it shall inform you about the purpose of the data processing and the following information prior to the further data processing:

- the duration of the storage of personal data or, if that is not possible, the criteria for determining the duration;
- the right to request the Data Controller to access, rectify, delete or restrict the processing of personal data concerning you and to object to the processing of personal data in the case of data processing based on a legitimate interest and to request data portability in the case of data processing based on consent or contractual relationship the right to justice;
- in the case of data processing based on consent, that you may withdraw your consent at any time,
- the right to lodge a complaint with the supervisory authority;

- whether the provision of personal data is based on a law or a contractual obligation or a precondition for concluding a contract, and whether you are obliged to provide personal data, and what the possible consequences of non-disclosure may be;
- the fact of automated decision-making (if such a procedure has been used), including profiling, and, at least in these cases, understandable information on the logic used and the significance of such data processing and the expected consequences for you.

The data processing can only start after that, if the legal basis of the data processing is consent, in addition to the information, you must also consent to the data processing.

This document contains all relevant data management information related to the operation of the webshop in accordance with the General Data Protection Regulation 2016/679 of the European Union (hereinafter: Regulation GDPR) and the 2011 CXII. TV. (hereinafter: Infotv.).