

Privacy Policy

This Privacy Notice ("Notice") contains the terms of the data processing practices related to the services provided by **Hoppline Kft.** (registered seat: 1141 Budapest, Szugló utca 130., company registration number: 01-09-999961, registered in the Company Registry of the Budapest-Capital Regional Court, tax number: 24287526-2-42) (hereinafter: "**Data Controller**").

The Data Controller declares that it respects the personal rights of the **Data Subjects**, in particular their data protection rights defined in **Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR")** and in **Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information ("Infotv.")**, and applies these rules as binding and governing for its activities together with the provisions set out in this document.

The purpose of this Notice is to provide the Data Subjects with all essential information and guidance in a concise, transparent, understandable and easily accessible form, using clear and plain language, and to assist the User in exercising their rights.

This Notice is available at the following page:

https://shop.unas.hu/shop_ordered/81562/pic/Dokumentumok/PrivacyPolicy.pdf

The Data Controller is entitled to unilaterally amend this Notice with prior notification to the Data Subjects. Such provisions shall become effective with respect to the relevant Data Subject upon the first use of the www.hoppline.hu website (hereinafter: "**Website**") following their publication.

THE DATA CONTROLLER AND ITS CONTACT DETAILS:

Name:

Hoppline Kft.

Registered seat:

1141 Budapest, Szugló utca 130.

Company registration number:

01-09-999961

Tax number:

24287526-2-42

E-mail:

b2b@hoppline.hu

Web:

www.hoppline.hu

CONTACT DETAILS OF THE DATA PROTECTION OFFICER:

Name:

Dr. Attila Tiborc

E-mail:

attila.tiborc@tz.legal

Phone:

+36 70 289 0182

DEFINITIONS:

"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, number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"processing": any operation or set of operations 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;

"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 designation may also be provided for by Union or Member State law;

"data processor": a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller;

"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 comply with the applicable data protection rules according to the purposes of the processing;

"consent of the data subject": any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them;

"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 RELATING TO THE PROCESSING OF PERSONAL DATA

Personal data shall be:

processed **lawfully, fairly and in a transparent manner** in relation to the data subject ("lawfulness, fairness and transparency");

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");

adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimization");

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");

kept in a form that 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 the implementation of appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subjects ("storage limitation");

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").

g. The **data controller** shall be responsible for compliance with the above principles and must be able to demonstrate such compliance ("accountability").

DATA PROCESSING

REGISTRATION

The fact of data collection, the scope of processed data and the purposes of data processing:

Personal Data Purpose of Data Processing

Last name, first name	Identification and enabling secure login to the user account.
E-mail address	Contact, sending system messages, login to the user account.
Date of birth	Identification.
Gender	Identification.
Password	Ensuring secure login to the user account.
Time of registration	Performing a technical operation.
IP address at the time of registration	Performing a technical operation.

The e-mail address does not necessarily have to contain personal data.

Data subjects: all data subjects registered on the website.

Duration of data processing, deadline for deletion of data: until the data subject submits a request for deletion. Personal data are deleted immediately upon deletion of the registration. The data controller shall inform the data subject electronically about the deletion of any personal data provided by the data subject in accordance with **Article 19 of the GDPR**. If the data subject's deletion request also covers the e-mail address provided by them, the data controller shall delete the e-mail address as well after providing the notification.

Persons authorized to access the data, recipients of personal data: personal data may be processed by the authorized employees of the data controller in accordance with this notice.

Legal basis of data processing: performance of a contract, **Article 6(1)(b) GDPR**.

DATA PROCESSING RELATED TO THE OPERATION OF THE WEBSHOP (USE OF THE SERVICE)

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

Personal Data Purpose of Data Processing

Last name, first name	Required for contact, placing the order and issuing a lawful invoice.
E-mail address	Contact and confirmation.
Telephone number	Contact and more efficient coordination regarding invoicing or delivery-related matters.
Date of birth	Identification.
Gender	Identification.
Billing name and address	Issuing a lawful invoice, establishing the contract, determining and modifying its content, monitoring its performance, invoicing the related fees, and enforcing related claims.
Shipping name and address	Enabling home delivery.
Time of registration	Performing a technical operation.
IP address at the time of registration	Performing a technical operation.

2. In the case of the e-mail address, it is not necessary for it to contain personal data.

3. Data subjects: all data subjects registered on the website or placing an order.

4. Duration of data processing, deadline for deletion of data: data processing continues until the data subject requests deletion. Personal data are deleted immediately upon deletion of the registration. The Data Controller shall inform the data subject electronically about the deletion of any personal data provided by the data subject in accordance with **Article 19 of the GDPR**. If the deletion request of the data subject also covers the e-mail address provided by them, the Data Controller shall delete the e-mail address after providing the notification.

In the case of **accounting documents**, pursuant to **Section 169 (2) of Act C of 2000 on Accounting**, these data must be retained for **8 years**.

5. Accounting records that directly or indirectly support accounting entries (including general ledger accounts and analytical or detailed records) must be kept in a **readable form for at least 8 years**, in a manner that allows retrieval based on references to accounting entries.

The Data Controller informs the Data Subjects that a request for the exercise of the **right to erasure ("right to be forgotten")** does not have to be fulfilled if the processing of personal data is necessary for compliance with a legal obligation requiring such processing.

6. Persons authorized to access the data, recipients of personal data: personal data may be processed by the **sales and marketing employees** of the Data Controller in accordance with the above principles.

7. Legal basis of data processing: pursuant to **Article 6(1)(b) GDPR**, processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract, and pursuant to **Article 6(1)(c) GDPR**, processing is necessary for compliance with a legal obligation to which the Data Controller is subject.

(Section 5 (1) of the Infotv., and Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce Services and Certain Issues of Information Society Services (hereinafter: Elker tv.): the service provider may process personal data that are technically indispensable for providing the service. Where other conditions are equal, the service provider must choose and operate the tools used for providing information society services in such a way that personal data are processed only if this is absolutely

necessary for the provision of the service and for the fulfillment of other purposes specified by law, and even in such cases only to the extent and for the duration necessary.)

DATA PROCESSING RELATED TO THE USE OF THE CUSTOMER SERVICE ASSISTANT (MOLIN AI)

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

Personal Data Purpose of Data Processing

Last name, first name	Identification, contact, customer identification
E-mail address	Contact, sending responses, sending notifications related to handling user inquiries
Telephone number (if provided)	Contact and further customer service handling
Content of the user's question or complaint	Fast, efficient and automated handling of user questions and complaints, providing customer support
Time of communication	Performing technical operations and incident management
Technical data generated during communication (IP address, browser information)	Technical operations and incident management

2. Data subjects: all data subjects who use the **customer service assistant (Molin AI)** on the website.

3. Duration of data processing: data are stored for **1 year after the completion of the case**, unless the data subject requests deletion earlier.

4. Persons authorized to access the data: the data may be processed exclusively by authorized employees of the Data Controller and by data processors in accordance with this Notice.

5. Legal basis of data processing: the **voluntary consent of the Data Subject, Article 6(1)(a) GDPR**. The Data Subject has the right to withdraw their consent at any time; however, such withdrawal shall not affect the lawfulness of processing carried out prior to the withdrawal.

NEWSLETTER, DIRECT MARKETING (DM) ACTIVITY

1. Pursuant to **Section 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Economic Advertising Activities**, the User may give prior and explicit consent for the Service Provider to contact them with promotional offers and other messages using the contact details provided during registration.

2. Furthermore, the Customer may consent, taking into account the provisions of this Notice, to the Service Provider processing the personal data necessary for sending promotional offers.

3. The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from receiving such messages **free of charge, without limitation and without providing any justification**. In this case, the Service Provider shall delete all personal data necessary for sending advertising messages from its records and will not contact the User with further promotional offers. The User may unsubscribe from advertisements by clicking the link included in the message.

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

Personal Data Purpose of Data Processing

Last name, first name, e-mail address	Identification, enabling subscription to the newsletter, sending newsletters.
Time of subscription	Performing a technical operation.
IP address at the time of subscription	Performing a technical operation.

5. Data subjects: all data subjects who subscribe to the newsletter.

6. Purpose of data processing: sending electronic messages containing advertisements (e-mail, push messages) to the data subject and providing information about current news, products, promotions, new features, etc.

7. Duration of data processing, deadline for deletion of data: data processing continues until the withdrawal of the consent declaration, i.e., until the data subject unsubscribes. The Data Controller shall inform the data subject electronically about the unsubscription and deletion from the newsletter mailing list in accordance with **Article 19 of the GDPR**.

8. Persons authorized to access the data, recipients of personal data: personal data may be processed by the **sales and marketing employees** of the Data Controller in compliance with the above principles.

9. The data subject may **unsubscribe from the newsletter at any time, free of charge**.

10. Legal basis of data processing: the **consent of the data subject**, pursuant to **Article 6(1)(a) GDPR, Section 5 (1) of the Infotv.**, and **Section 6 (5) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Economic Advertising Activities**.

The advertiser, advertising service provider or publisher of the advertisement may maintain a register of the personal data of persons who have provided their consent within the scope specified in the consent declaration. The data recorded in this register concerning the recipient of the advertisement may be processed only in accordance with the consent declaration and until its withdrawal, and may be transferred to third parties only with the prior consent of the data subject.

11. Please note that:

- data processing is based on ****your consent****;
- you are required to provide personal data if you wish to receive newsletters from us;
- failure to provide such data will result in our inability to send newsletters to you.

COMPLAINT HANDLING

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

Personal Data Purpose of Data Processing

Last name and first name	Identification and contact.
E-mail address	Contact.
Telephone number	Contact.
Billing name and address	Identification and handling quality complaints, questions and issues related to the ordered products.

Data subjects: all data subjects who make purchases (order services) on the website and who submit quality complaints or lodge complaints.

Duration of data processing, deadline for deletion of data: if the complaint is submitted by a person qualifying as a consumer, the Data Controller is obliged to retain the report taken about the complaint and a copy of the response for **three years**, pursuant to **Section 17/A (7) of Act CLV of 1997 on Consumer Protection**.

Persons authorized to access the data, recipients of personal data: personal data may be processed by the **sales and marketing employees** of the Data Controller in accordance with the above principles.

Legal basis of data processing: pursuant to **Article 6(1)(c) GDPR**, processing is necessary for compliance with a **legal obligation** to which the Data Controller is subject, based on **Section 17/A (5) of Act CLV of 1997 on Consumer Protection**.

SOCIAL MEDIA PLATFORMS

Pursuant to **Articles 12 and 13 of the GDPR** and the **Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information**, the following information must be defined regarding data processing on social media platforms:

- the fact of data collection,
- the scope of data subjects,
- the purpose of data collection,
- the duration of data processing,
- the persons authorized to access the data,
- the description of the data subjects' rights related to data processing.

Fact of data collection and scope of processed data:

the name registered on social media platforms such as **Facebook / Google+ / Twitter / Pinterest / YouTube / Instagram**, etc., and the user's public profile picture.

Data subjects:

all data subjects who are registered on **Facebook / Google+ / Twitter / Pinterest / YouTube / Instagram**, etc., and who have **"liked"** the Service Provider's social media page or any of the Data Controller's posts.

Purpose of data collection:

sharing, liking, following or promoting certain content elements, products, services, promotions, or the social media page itself on social media platforms.

Duration of data processing, deadline for deletion of data, persons authorized to access the data and the description of the data subjects' rights:

the data subject may obtain information about the source of the data, the processing of the data, the method of transfer and the legal basis on the respective social media platform. Since data processing takes place on social media platforms, the **duration of data processing, the method of processing, and the possibilities for deletion and modification of the data are governed by the rules of the respective social media platform**.

Legal basis of data processing:

the **voluntary consent of the data subject** to the processing of their personal data on social media platforms.

DATA PROCESSORS ENGAGED

Hosting Service Provider

1. Activity performed by the Data Processor: Hosting services
2. Name and contact details of the Data Processor:

Név:	Challenger-Solution-it Kft.
Székhely:	3000 Hatvan, Madách utca 10/A
E-mail:	info@challengerit.hu
Telefon:	+36 30 506 1132

3. Scope of data processing and categories of data processed:

4. Categories of data subjects: All individuals using the services of the website, as well as all users registered on the website or placing an order.
5. Purpose of data processing: To ensure the availability and proper operation of the website (hosting services).
6. Duration of data processing and deadline for data deletion: Data processing shall continue until the termination of the agreement between the Service Provider and the Hosting Service Provider, or until the data subject submits a request for deletion to the Hosting Service Provider.
7. Legal basis for data processing: The consent of the User pursuant to Section 5(1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.), Article 6(1)(a) of the GDPR, and Section 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

Delivery

Name: **DPD Hungary Kft**

Registered seat: Budapest, Váci út 33, 1134

Fact of data processing and scope of processed data:

shipping name, shipping address, telephone number, e-mail address.

Data subjects:

all data subjects requesting home delivery.

Purpose of data processing:

delivery of the ordered product to the customer.

Duration of data processing, deadline for deletion of data:

until the completion of the home delivery process.

Legal basis of data processing:

pursuant to **Article 6(1)(b) GDPR**, processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.

Online Payment

Activity performed by the Data Processor:

Online payment processing.

Name and contact details of the Data Processor:**For Hungary and Slovakia:**

Name:

OTP Mobil Szolgáltató Kft

Registered seat:

1093 Budapest, Közraktár u. 30–32.

Contact:

ugyfelszolgalat@simple.hu

Customer service:

+36 1 3666 611

Fact of data processing and scope of processed data:

billing name, billing address, e-mail address.

Data subjects:

all data subjects requesting **online payment**.

Purpose of data processing:

processing online payments, confirming transactions, and performing **fraud monitoring** (prevention of fraudulent activities) in order to protect users.

Duration of data processing, deadline for deletion of data:

until the completion of the online payment process.

Legal basis of data processing:

pursuant to **Article 6(1)(b) GDPR**, processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.

Website Operation**Activity performed by the Data Processor:**

website operation (monitoring, technical updates, development of security systems, other developments, and maintenance tasks).

Name and contact details of the Data Processor:

Name:

Challenger-Solution-it Kft.

Registered seat:

3000 Hatvan, Madách utca 10/A

E-mail:

info@challengerit.hu

3. Fact of data processing and scope of processed data:

all personal data provided by the data subject.

Data subjects:

all data subjects using the services of the website or who have registered on the website or placed an order.

Purpose of data processing:

operation of the website (development, monitoring, bug fixes).

Duration of data processing, deadline for deletion of data:

until the termination of the agreement between the Service Provider and the website operator, or until the data subject submits a deletion request to the website operator.

Legal basis of data processing:

the **consent of the User**, pursuant to **Section 5 (1) of the Infotv.**, **Article 6(1)(a) GDPR**, and **Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce Services and Certain Issues of Information Society Services**.

Accounting Tasks and Invoicing**Activity performed by the Data Processor:**

Accounting tasks and invoicing.

Name and contact details of the Data Processor:

Name:

Hoppline Kft.

Registered seat:

1141 Budapest, Szugló utca 130.

E-mail:

b2b@hoppline.hu

The Service Provider uses a **so-called accounting scoring software**, which is provided by the following data processor:

Name:

QLM Software Support Solutions Kft.

Registered seat:

2045 Törökbálint, Torbágy u. 14

E-mail:

info@qlm.hu

Phone:

+36 23 800 420

Fact of data processing and scope of processed data:

name, billing name, billing address.

Data subjects:

all data subjects placing orders on the website.

Purpose of data processing:

issuing electronic invoices and performing accounting tasks.

Duration of data processing, deadline for deletion of data:

8 years, pursuant to **Section 169 (2) of Act C of 2000 on Accounting**.

Legal basis of data processing:

pursuant to **Article 6(1)(c) GDPR**, processing is necessary for compliance with a **legal obligation** to which the Data Controller is subject.

The Data Controller informs the Data Subjects that a request for the exercise of the **right to erasure ("right to be forgotten")** does not have to be fulfilled if the processing of personal data is necessary for compliance with a legal obligation requiring such processing.

DM / Newsletter Sending

Activity performed by the Data Processor:

Provision of DM/newsletter sending software (Webgalamb and MailChimp).

Names and contact details of the Data Processors:

Name:

CREON HEROES Zrt.

Registered seat:

5561 Békésszentandrás, Dr. Dunay Alajos u. 1.

Name:

Rocket Science Group LLC.

Registered seat:

675 Ponce de Leon Avenue Northeast, Suite 5000

Atlanta, GA 30308-2172

United States

3. Fact of data processing and scope of processed data:

Name, e-mail address.

4. Data subjects:

all users who have subscribed to the newsletter or have given prior consent to the processing of their data for direct marketing activities.

5. Purpose of data processing:

sending direct marketing materials and newsletters to the data subjects.

6. Duration of data processing, deadline for deletion of data:

until the termination of the agreement between the Service Provider and the software provider, or until the data subject submits a deletion request.

7. Legal basis of data processing:

pursuant to **Article 6(1)(a) GDPR**, the **consent of the Data Subject**, **Section 5(1) of the Infotv.**, and **Section 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities**.

Banking Services

Activity performed by the Data Processor:

Provision of full banking services.

Name and contact details of the Data Processor (with regard to Hungary):

Name:

UniCredit Bank Hungary Zrt.

Registered seat:

1052 Budapest, Szabadság tér 5-6.

Phone number:

+36 1 325 3200

Fact of data processing and scope of processed data:

Billing name, billing address, e-mail address, bank account number, date of payment, transaction identifier.

Data subjects:

all data subjects requesting payment by bank card.

Purpose of data processing:

processing bank card payments, confirmation and execution of transactions.

Duration of data processing, deadline for deletion of data:

in accordance with the applicable legal requirements governing banking and financial transaction records.

Legal basis of data processing:

pursuant to **Article 6(1)(b) GDPR**, the processing is necessary for the performance of a **contract** to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract.

Other Data Processors Applicable to All Countries

IBANFIRST SA

Registered seat: Belgium, Brussels, 1053, 350 Avenue Louise

E-mail: hellohungary@ibanfirst.com

Phone: +36 1 700 8978

Wise Europe SA

Registered seat: Avenue Louise 54, Room S52, Brussels, Belgium

E-mail: privacy@wise.com

Revolut Bank UAB

Registered seat: Konstitucijos ave 21B, Vilnius, 08130, Republic of Lithuania

Contact: +44 203 322 8352

Online / Cloud Storage Providers

Dropbox UK Online LTD.

Registered seat: United Kingdom, London, EC2N 4AG,
8th Floor, 100 Bishopsgate

Microsoft Ireland Operations Limited (OneDrive)

Registered seat: Sir John Rogerson's Quay, Street 70/2, Dublin, Ireland

Google LLC (formerly Google Inc., Google Drive)

1600 Amphitheatre Parkway, Mountain View, California 94043, USA

Any **transfer of personal data outside the European Economic Area (EEA)** may only take place in accordance with the **Standard Contractual Clauses ("SCC") adopted by the European Commission**, thereby ensuring the lawful transfer of personal data at all times.

For the **Google Cloud service**, the Standard Contractual Clauses are available at the following link:

<https://cloud.google.com/terms/eu-model-contract-clause>

For the **OneDrive service**, the Standard Contractual Clauses are available at the following link:

<https://docs.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses>

For the **Dropbox service**, the Standard Contractual Clauses are available at the following link:

<https://assets.dropbox.com/documents/en-us/legal/eu-standard-clauses-dfb-011017.pdf>

COOKIES

During the visit to the Data Controller's website, a small data package, the so-called **cookie**, may be placed on the computer of the Data Subject. Some cookies are essential for the proper functioning of the Website, while others collect information about the use of the site in order to improve the user experience. Certain cookies disappear when the browser is closed, while others remain on the computer for a longer period of time. The purpose of cookies is to ensure the highest possible level of operation of the given website and to improve the user experience.

The User is able to delete cookies from their own computer and may also configure their browser to automatically block the use of cookies. By disabling the use of cookies, the User acknowledges that without cookies the operation of the given website may not be fully functional.

The Data Controller uses the following cookies on its Website:

a) Cookies necessary for the session

Session cookies are necessary for browsing the website and using its functions, and they guarantee the proper and secure operation of the website. Without these cookies the website cannot function properly, therefore they are used throughout the entire session. The use of these cookies does not require the separate consent of the Data Subject.

Legal basis: the **legitimate interest of the Data Controller**.

The session cookies used by the website are as follows:

Cookie type	Legal basis for data processing	Duration of data processing	Scope of processed data
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Session cookies	Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce Services and Certain Issues of Information Society Services (Elker tv.)	Until the end of the relevant visitor session	connect.sid
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b) Cookies analyzing user activity

With the help of cookies analyzing user activity, the Data Controller collects information about the website usage habits of the Data Subject in order to further improve and develop the website. These cookies are applied only with the consent of the Data Subject.

Legal basis: the **consent of the Data Subject**.

c) Analytical Cookies

The Data Controller uses analytical cookies in order to learn about the usage habits of visitors to the Website. In this process, the Data Controller collects information about the pages viewed, the type of platform used by the User, as well as the date and time of activities. The Data Controller also collects information about how the User arrived at the Website and when the User left it. With the help of analytical cookies, the Data Controller also gathers information about the effectiveness of advertisements or communications placed on the Website in order to ensure that interesting and relevant content can be provided to the User in the future.

Legal basis: the **consent of the Data Subject**.

d) Commercial Cookies

The Data Controller uses commercial cookies on the Website for the display of online advertisements in order to show personalized advertisements to the User. Commercial cookies also indicate whether the User has viewed an advertisement and how long the User viewed it.

Legal basis: the **consent of the Data Subject**.

e) When the User accesses the Website, the Data Controller records the **IP address of the User** in connection with the provision of the service, based on the **legitimate interest of the Data Controller** and for the purpose of ensuring the lawful provision of the service (for example, in order to filter unlawful use or unlawful content), even without the separate consent of the User.

If the User does not wish to allow the use of cookies, they may partially or completely disable them or modify the cookie settings in their internet browser settings. Instructions regarding the management of cookies are available for the following browsers at the links below:

- **Google Chrome:**
<https://support.google.com/chrome/answer/95647?hl=hu>
- **Firefox:**
<https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>
- **Microsoft Internet Explorer:**
<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Apple Safari:**
<https://help.apple.com/safari/mac/8.0/#/sfri11471>
- **Opera:**
<http://help.opera.com/Windows/10.20/hu/cookies.html>

Further information regarding the management of cookies can be found in the **"Help" function of the browser**.

f) Technical Cookies Used by the Customer Service Assistant (Molin AI)

Technical cookies essential for the operation of the customer service assistant available on the Website (Molin AI) are used. These cookies solely ensure the proper functioning of the chat window and do not store personally identifiable data in the long term. Their use does not require separate consent.

Legal basis: the **legitimate interest of the Data Controller**, pursuant to **Article 6(1)(f) GDPR**.

USE OF GOOGLE ADWORDS CONVERSION TRACKING

The Data Controller uses the **"Google AdWords" online advertising program**, and within its framework also uses the **Google conversion tracking service**. Google conversion tracking is an analytics service provided by **Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google")**.

When a User reaches a website through a **Google advertisement**, a cookie necessary for conversion tracking is placed on the User's computer. These cookies have a **limited validity period** and **do not contain any personal data**, therefore the User cannot be identified by them.

When the User browses certain pages of the website and the cookie has not yet expired, both **Google and the Data Controller** can see that the User has clicked on the advertisement.

Each **Google AdWords customer receives a different cookie**, therefore they cannot be tracked through the websites of other AdWords customers.

The information obtained through the **conversion tracking cookies** is used to create **conversion statistics** for AdWords customers who choose conversion tracking. Customers are informed about the number of users who clicked on their advertisement and were redirected to a page equipped with a conversion tracking tag. However, they do not receive information that would allow them to identify any individual user.

If the User does not wish to participate in conversion tracking, they may refuse it by **disabling the installation of cookies in their browser settings**. In this case, the User will not be included in the conversion tracking statistics.

Further information and **Google's privacy policy** are available at the following website:

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 so-called **"cookies"**, which are text files stored on the User's computer and help analyze how the website is used by the User.

The information generated by cookies relating to the User's use of the website is usually transmitted to and stored on a **Google server in the United States**. With the activation of **IP anonymization** on the website, Google shortens the User's IP address in advance within Member States of the European Union or in other states that are parties to the Agreement on the European Economic Area.

The full IP address is transmitted to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to **evaluate how the User uses the website**, to **compile reports on website activity for the website operator**, and to **provide further services relating to website and internet usage**.

Within the scope of **Google Analytics**, the IP address transmitted by the User's browser will **not be combined with other data held by Google**.

The User may prevent the storage of cookies by selecting the appropriate settings in their browser; however, please note that in this case it may not be possible to use all the functions of this website in full. The User may also prevent Google from collecting and processing data generated by cookies relating to the User's use of the website (including the IP address) by downloading and installing the browser plug-in available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=hu>

CUSTOMER RELATIONS AND OTHER DATA PROCESSING

If any questions arise during the use of the services of the Data Controller, or if the Data Subject encounters a problem, the Data Subject may contact the Data Controller through the methods provided on the website (telephone, e-mail, social media platforms, etc.).

The Data Controller stores incoming **e-mails, messages, and data provided via telephone, Facebook, or other channels**, together with the name and e-mail address of the inquirer and other voluntarily provided personal data, for **3 years from the date of receipt of the complaint**, in accordance with **Section 17/A (7) of Act CLV of 1997 on Consumer Protection**.

Information regarding data processing not listed in this notice will be provided at the time the data is collected.

In the case of **exceptional requests from authorities**, or requests from other bodies based on legal authorization, the Data Controller is obliged to **provide information, disclose or transfer data, or make documents available**.

In such cases, the Data Controller shall disclose **only such personal data and only to the extent that is strictly necessary for achieving the purpose of the request**, provided that the requesting authority has specified the exact purpose and scope of the requested data.

RIGHTS OF DATA SUBJECTS

1. Right to Transparent Information and Communication

The Data Controller shall take appropriate measures to provide the Data Subject with all information and communication relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and in writing.

2. Right to Information and Access to Personal Data

At the time the personal data is obtained, the Data Controller shall provide the Data Subject with the following information:

- the identity and contact details of the Data Controller and its representative;
- the purpose of the intended processing of personal data and the legal basis for the processing;
- the identity of the person or organization involved in the transfer of the data;
- the period for which the personal data will be stored;
- the right of the Data Subject to request from the Data Controller access to personal data concerning them, rectification or erasure of such data, or restriction of processing concerning the Data Subject, and the right to object to processing as well as the right to data portability;
- the right to lodge a complaint with the supervisory authority;
- the right to withdraw consent at any time;
- whether the provision of personal data is based on a legal or contractual obligation, or is a prerequisite for entering into a contract, and whether the Data Subject is obliged to provide the personal data, as well as the possible consequences of failure to provide such data.

3. Right of Access of the Data Subject

The Data Subject has the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them are being processed and, where that is the case, has the right to access the personal data and the following information.

4. Right to Rectification

The Data Subject has the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning them and to request the completion of incomplete personal data.

5. Right to Erasure ("Right to be Forgotten")

The Data Subject has the right to request that the Data Controller erase personal data concerning them without undue delay if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the Data Subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been processed unlawfully;
- the personal data must be erased for compliance with a legal obligation in Union or Member State law applicable to the Data Controller;
- the personal data were collected in relation to the offer of information society services.

The Data Controller informs Data Subjects that a request for erasure or the exercise of the right to be forgotten does not have to be fulfilled if the processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation requiring processing of personal data or for the performance of a task carried out in the exercise of official authority;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defense of legal claims.

6. Right to Restriction of Processing

The Data Subject has the right to request that the Data Controller restrict processing where one of the following applies:

- the Data Subject contests the accuracy of the personal data, in which case the restriction applies for a period enabling the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the data and instead requests the restriction of their use;
- the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defense of legal claims;
- the Data Subject has objected to processing; in this case the restriction applies for the period until it is determined whether the legitimate grounds of the Data Controller override those of the Data Subject.

7. Right to Data Portability

The Data Subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another Data Controller without hindrance from the Data Controller, where:

- the processing is based on the Data Subject's consent; and
- the processing is carried out by automated means.

When exercising the right to data portability, the Data Subject also has the right to request the direct transfer of personal data between Data Controllers, where technically feasible.

8. Right to Object

The Data Subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them, including profiling based on these provisions. In such a case, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or for the establishment, exercise or defense of legal claims.

9. Automated Decision-Making in Individual Cases, Including Profiling

The Data Subject has the right **not to be subject to a decision based solely on automated processing**, including profiling, which produces legal effects concerning them or similarly significantly affects them.

Union or Member State law applicable to the Data Controller may restrict the rights set out in this section if such restriction respects the essence of fundamental rights and freedoms and constitutes a necessary and proportionate measure to safeguard the following:

- national security;
- national defense;
- public security;
- the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including protection against and prevention of threats to public security;
- other important objectives of general public interest of the Union or of a Member State, in particular important economic or financial interests of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security;
- the protection of judicial independence and judicial proceedings;
- the prevention, investigation, detection and prosecution of breaches of ethics in regulated professions;
- monitoring, inspection or regulatory functions connected to the exercise of official authority;
- the protection of the Data Subject or the rights and freedoms of others;
- the enforcement of civil law claims.

During the operation of the **customer service assistant (Molin AI)**, automated decision-making takes place, whereby the system

automatically categorizes incoming user inquiries based on their content and prepares or directly provides responses. The purpose of automated decision-making is to ensure **faster and more efficient customer service**.

The Data Subject has the right to **request human intervention**, to **express their point of view regarding the decision**, and to **contest the decision**. Such requests may be submitted by the Data Subject through the **Data Controller's customer service channels**.

TIME LIMIT FOR TAKING ACTION

The Data Controller shall inform you **without undue delay, but in any case within 1 month of receipt of the request**, of the measures taken in response to the above requests.

Where necessary, this period may be **extended by an additional 2 months**. The Data Controller shall inform you of any such extension within **1 month of receiving 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, but no later than within one month of receipt of the request**, of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

SECURITY OF DATA PROCESSING

The Data Controller and the Data Processor shall implement **appropriate technical and organizational measures** in order to ensure a level of data security appropriate to the risk, taking into account the **state of the art, the costs of implementation, the nature, scope, circumstances and purposes of the processing**, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons.

Such measures may include, where appropriate:

- **pseudonymisation and encryption of personal data**;
- ensuring the **ongoing confidentiality, integrity, availability and resilience** of processing systems and services used for processing personal data;
- the ability to **restore the availability of and access to personal data in a timely manner** in the event of a physical or technical incident;
- a procedure for **regularly testing, assessing and evaluating the effectiveness** of technical and organizational measures implemented to ensure the security of data processing.

DATA PROTECTION INCIDENTS AND LEGAL REMEDIES

If an event occurs that results in the **accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data transmitted, stored or otherwise processed** (Data Protection Incident), the Data Controller undertakes to notify the **National Authority for Data Protection and Freedom of Information** without undue delay and, where feasible, **no later than 72 hours after becoming aware of the data protection incident**, as the competent supervisory authority.

National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa utca 9–11.

Phone: +36-1-391-1400

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

The notification obligation does not apply if the data protection incident is **unlikely to result in a risk to the rights and freedoms of natural persons**.

If the data protection incident is **likely to result in a high risk to the rights and freedoms of natural persons**, the Data Controller shall inform the Data Subject about the data protection incident **without undue delay**, and the notification shall clearly and comprehensibly describe the nature of the data protection incident.

If the Data Controller causes damage to another person by **unlawful processing of personal data or by breaching the requirements of data security**, the Data Controller shall be liable for compensation. If such conduct infringes the personality rights of the Data Subject, the Data Subject may claim **compensation for non-pecuniary damages**.

The Data Controller shall be **exempt from liability for damages and the obligation to pay compensation** if it proves that the damage or the infringement of the Data Subject's personality rights was caused by an unavoidable reason beyond the scope of data processing.

The Data Subject may exercise their rights through the following contact details:

Name: Hoppline Kft.

Registered seat: 1141 Budapest, Szugló utca 130.

E-mail: b2b@hoppline.hu

For legal remedies, the Data Subject may contact the following authority:

National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa u. 9–11.

Phone: +36-1-391-1400

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

In the event of a violation of their rights, the Data Subject is entitled to **seek legal remedy before a court**. The adjudication of the case falls within the competence of the **regional court (törvényszék)** and proceedings may also be initiated before the regional court having jurisdiction over the Data Subject's place of residence.

A list and contact details of the regional courts are available at the following link:

<http://birosag.hu/torvenyszekek>

FINAL PROVISIONS

During the preparation of this Notice, the following legal regulations were taken into consideration:

- **Regulation (EU) 2016/679 of the European Parliament and of the Council** 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 (**GDPR**);
- **Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.)**;
- **Act CVIII of 2001 on Electronic Commerce Services and Certain Issues of Information Society Services (Elker tv.)**;
- **Act CLV of 1997 on Consumer Protection (Fgytv.)**;
- **Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities**;

- **Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices Against Consumers;**
- **Act XC of 2005 on Electronic Freedom of Information;**
- **Act C of 2003 on Electronic Communications** (in particular Section 155);
- **Opinion No. 16/2011** on the EASA/IAB Recommendation on Best Practice for Online Behavioural Advertising;
- The recommendation of the **National Authority for Data Protection and Freedom of Information** on the data protection requirements of prior information.

The **effective date of the amendment of this Notice:**

6 March 2026

Budapest, 6 March 2026

Hopline Kft.