

# DATA PROTECTION POLICY

## OF SYLVERRO KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG



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SYLVERRO Kft, as a controller, acknowledges the content of this legal notice as binding. It undertakes to ensure that all data processing related to its activity meets the requirements set out in this policy and in all applicable legislation.

This Policy intends to ensure that the rights of all Customers/Clients/Users (hereinafter: Customer, Client or User) concerned, irrespective of their nationality or place of residence, including especially their right to private life, should be respected in each aspect of the services supplied by SYLVERRO Kft, in the course of automatic and paper-based processing of their personal data (data privacy).

SYLVERRO Kft respects the personal rights of the Users of the [www.supersizefashion.com](http://www.supersizefashion.com) webpage; it processes the personal data recorded confidentially, in accordance with data protection laws and international recommendations, in compliance with this Statement of Privacy.

The User, using the Webpage, accepts the following and agrees to the data processing specified below.

### Purpose of data processing

SYLVERRO Kft stores the data provided by the User, Customer or Partner for a specific purpose, solely for the fulfilment of the contract, the sending of newsletters and for the subsequent proof of the contract's terms and conditions. SYLVERRO Kft does not use your personal data for purposes other than the one indicated.

### Legal ground of data processing

Data processing is carried out by SYLVERRO Kft pursuant to the voluntary consent of Customers detailed in Section 5 (1) of Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter: Infotv.) and in accordance with Act CVIII of 2001 on Electronic Trading Services and Certain Issues Concerning Services in an Information Society.

a) Consent is provided by the Visitor with respect to certain data processing using the Webpage, by registering or by voluntarily providing the data in question.

### Details of the controller:

- Name: SYLVERRO Kft.
- Registered office: 2143 Kistarcsa, Baross G. street 11
- Correspondence address: 2143 Kistarcsa, Baross G. utca 11
- Company registration number: 13-09-085338
- Tax number: 12494646-2-13
- E-mail address: [info@molettdivat.hu](mailto:info@molettdivat.hu)
- Phone number: +36 70 538 2467

## Duration of data processing

The processing of personal data entered during the registration process begins with registration and ends with deregistration. This applies to both mandatory and non-mandatory data. Registration can be terminated at any time by the User by clicking on the 'suspend account' button in their personal profile menu or by deregistering from SYLVERRO Kft, if the User sends a request to that effect by e-mail or by post. SYLVERRO Kft shall erase the registration, together with the personal data, within 5 working days of receipt of the request. If the User decides to deregister, the data shall automatically be erased as soon as the visitor clicks on the link to complete the deregistration, which shall be automatically sent by the system in the form of an e-mail.

The above provisions do not affect the fulfilment of the retaining obligations set out in other legislation (e.g. in accounting laws) or the processing of data carried out according to consent obtained through the webpage during registration or in another manner.

Logged data will be stored for up to 12 months from the date of logging, except for the last visit date, which is automatically overridden by the system.

## Processed data

### Technical data

When browsing the site, technical data is recorded (e.g. in the form of log files, which include the user's IP address, the date and time and the URL of the visited page). The logging of these data is carried out continuously by the system, but it is not linked to the data entered during registration or use. The data collected in this manner cannot be accessed by the User, only by SYLVERRO Kft. The above data is used by SYLVERRO Kft only for the technical operation of the webpage and for statistical purposes.

### Registration

During registration, the User shall be required to provide the following personal data:

- Name
- E-mail address
- Phone number

During registration, the User shall provide the following data for the successful opening of an account:

- Name
- Country
- Postcode
- Town/city
- Street, house number

If the User's billing address does not match the delivery address, the User may specify the delivery details separately, without ticking the checkbox 'Delivery address is the same as billing address'. The system then requests the following information for successful delivery:

- Name
- Country
- Postcode
- Town/city
- Street, house number

After the data has been provided, SYLVERRO Kft shall notify the User of the successful registration by e-mail, which they can validate by clicking on the confirmation link. SYLVERRO Kft does not assume any liability for damages resulting from erroneous registration.

In order for the registration to be successful, the User must also provide a secure password that only the User knows. If a password is forgotten SYLVERRO Kft can only generate a new password, which can be created by the system of [www.supersizefashion.com](http://www.supersizefashion.com) upon request. The existing password cannot be sent out by the system for security reasons. To generate a new user password, the user must enter the e-mail address provided at the time of registration.

**The system of the [www.supersizefashion.com](http://www.supersizefashion.com) webpage stores passwords in a way that not even the owners of SYLVERRO Kft or the system administrator have access to them.**

During registration, the User has the opportunity to subscribe to the newsletter of [www.supersizefashion.com](http://www.supersizefashion.com) operated by SYLVERRO Kft. The User must check the 'Subscribe to Newsletter' option, as well as consent to SYLVERRO Kft sending them promotional and marketing messages related to the webshop of [www.supersizefashion.com](http://www.supersizefashion.com) to the e-mail address provided. Without this consent, the User's account cannot connect to the newsletter system.

### Cookies

The system identifies the computers of the visitors of the [www.supersizefashion.com](http://www.supersizefashion.com) webpage with so-called cookies. In order to be able to view the full content on SYLVERRO Kft's webpage, cookies must be enabled on the part of the User. Accordingly, when downloading certain parts of the Webpage, cookies are placed on the user's computer that are required for the functionality of the webpage.

Cookies are small text files that your computer and browser saves. When this happens, no notification is sent by SYLVERRO Kft to the User.

SYLVERRO Kft uses two types of cookies:

1. Temporary (session) cookie: session cookies are automatically deleted after each User visit. These cookies are designed to help SYLVERRO Kft's website work more efficiently and safely, therefore they are essential for enabling the proper function of some features of the website and some applications.
  2. Permanent (persistent) cookie: SYLVERRO Kft is also using permanent cookies to provide a better user experience (e.g. providing optimised navigation).  
These cookies are stored for a longer period in the cookie file of the browser. The length of time depends on the settings the User applies in their browser.
- Cookies are not capable of identifying users, and they are only live during the browsing sessions.
  - The above data is used by SYLVERRO Kft only for the technical operation purposes.
  - The 'Help' feature on most of the browsers' menu bars provides information on how to:
    - disable cookies,
    - accept new cookies, or
    - instruct your browser to set up a new cookie, or
    - turn off other cookies in your browser.

The cookies used on the [www.supersizefashion.com](http://www.supersizefashion.com) webpage do not cause damage to the User's computer and do not contain any virus.

### Google Analytics

SYLVERRO Kft uses Google Inc.'s (hereinafter: Google) Google Analytics (<https://www.google.com/analytics/>) analytical services on the [www.supersizefashion.com](http://www.supersizefashion.com) webpage.

During its operation Google Analytics uses cookie files, which it saves to the visitor's computer or smart device, allowing it to analyse the visitor's user habits on the webpage. User-generated information is stored and analysed by Google on its servers, and according to Google Analytics's operating policy, the evaluated information is placed in SYLVERRO Kft's own Google Analytics account.

Through Google Analytics, SYLVERRO Kft only accesses data relating to user habits (such as time spent on the page, the most, or the least visited pages), but not the information suitable for identification.

SYLVERRO Kft uses this data exclusively to optimise the webpage.

The user can modify the settings of cookies in their own browser, or by installing the Google Analytics Opt-out Browser Add-on they can block Google from analysing their user habits with Google Analytics. (<https://tools.google.com/dlpage/gaoptout?hl=hu>)

## Google AdWords & AdSense

SYLVERRO Kft uses the marketing and remarketing tracking codes of Google Adwords for marketing purposes on the [www.supersizefashion.com](http://www.supersizefashion.com) webpage. As a result, visitors of the page shall later be able to see marketing ads

from SYLVERRO Kft promoting the [www.supersizefashion.com](http://www.supersizefashion.com) on the webpages of the Google AdSense network. Google Adwords and AdSense systems use cookies to manage ads that can be viewed later by the user.

Visitors of the page may disable these cookies if they go to the Ads Preferences Manager of Google and follow the instructions provided there. After which, they shall no longer see personalised offers from SYLVERRO Kft.

## Social media

SYLVERRO Kft operates its own channels connected to the [www.supersizefashion.com](http://www.supersizefashion.com) webpage on the following social media networks:

- Facebook: <https://www.facebook.com/Sylverro/>
- Pinterest: <https://hu.pinterest.com/source/molettdivat.hu/>
- YouTube: [https://www.youtube.com/channel/UCF\\_Mn3VeuMwOPfg9A3b5p1Q/](https://www.youtube.com/channel/UCF_Mn3VeuMwOPfg9A3b5p1Q/)

When using social networking sites, SYLVERRO Kft does not record user and visitor data (e.g. IP address).

The coding and technical operation of social networking sites contains links, both from and to outside servers, independent of SYLVERRO Kft. The service provider of these links may be able to collect user data due to the direct connection to their server.

SYLVERRO Kft. does not accept any liability for the data provided by users on social media pages, and does not verify their authenticity.

The social media profiles of SYLVERRO Kft created for [www.supersizefashion.com](http://www.supersizefashion.com) are managed by internal employees of SYLVERRO Kft. The employees of SYLVERRO Kft cannot use and cannot record publicly available data from users.

The privacy policy of each social media site may be requested by the User from the operator of the given social networking site if it is available on the site directly. SYLVERRO Kft is liable solely for the textual, visual and video content published ('shared') by its employees. SYLVERRO Kft uses social media sites for promotional and marketing purposes only.

## Newsletter

SYLVERRO Kft allows visitors to subscribe to the newsletter services of the [www.supersizefashion.com](http://www.supersizefashion.com) webpage with or without registration. The newsletter contains direct marketing elements and promotional material. SYLVERRO Kft processes the data provided by the User during their interaction with the newsletter.

SYLVERRO Kft shall only send messages or advertisement (newsletter) to the e-mail address provided during registration or during subscription to the separate newsletter, only with the explicit consent of the User, in the cases and in the manner prescribed by law, i.e. if the User ticks the check box next to the 'Subscribe' button saying 'I consent to SYLVERRO Kft sending me promotional and marketing messages relating to [www.supersizefashion.com](http://www.supersizefashion.com), to the e-mail address provided during the registration' and then clicking the 'Subscribe' button.

The [www.supersizefashion.com](http://www.supersizefashion.com) newsletters are written and sent out by internal employees of SYLVERRO Kft.

The User may unsubscribe from newsletters at any time without any limitation or justification. This can be done in a letter, by e-mail or by clicking the 'Unsubscribe' link at the bottom of the newsletters. In this case, SYLVERRO Kft does not send the User any further newsletters or offers. In case of unsubscribing requests received by post or in an e-mail, the employees of SYLVERRO Kft shall remove User's registered e-mail address from the Newsletter system within 5 working days.

#### WiFi networks

SYLVERRO Kft maintains a separate WiFi network at the Budaörs its site, exclusively for employees and contracted partners of the company, which can only be used by inputting the appropriate password.

For the sake of its own security, SYLVERRO Kft monitors the traffic of the network and saves the activities as LOG files, storing them for up to 12 months. The LOG files contain the following data:

- IP address of the connected device
- MAC address of the connected device
- Visited webpages from the given IP address
- Date of connection to the network (date, time)

SYLVERRO Kft reserves the right to allow the owners and the administrator, as well as the contracting IT partners of SYLVERRO Kft to inspect the LOG files at any time, without prior notice.

If the administrator or the IT team of SYLVERRO Kft detects extreme or criminal activity on the WiFi network, it disconnects the network without prior notice (the internet service becomes unavailable) and analyses the LOG files and the monitoring data, following which, if it deems it necessary, takes the necessary safety and legal steps.

If a User (partner, employee) causes damage to SYLVERRO Kft with their actions, then SYLVERRO Kft is entitled to claim damages from the User (partner, employee).



SYLVERRO Kft assumes no liability if a Partner suffers a digital attack through the WiFi networks operated by SYLVERRO Kft, or in the case of any damage (e.g. data theft) incurred. Each User may use the WiFi network at their own risk.

SYLVERRO Kft reserves the right, without prior notification or notice:

- To change the name of the Wi-Fi networks it operates
- To change the password for WiFi networks that it operates
- To block users based on their IP and/or MAC addresses
- To turn off the WiFi networks

In the case of a court or official instruction, SYLVERRO Kft shall make available the requested LOG files within 3 (i.e. three) working days.

The User has the sole discretion and responsibility to use the Wi-Fi network in the knowledge of these data processing terms and conditions.

### Range of individuals having access to the data

The data is primarily accessible to the internal employees of SYLVERRO Kft and SYLVERRO Kft, who do not disclose them or share them with third parties and may only use them for purposes defined in the Data Protection Policy.

For the operation of the underlying IT system, the execution of orders and table reservations, and for the settlement of accounts SYLVERRO Kft may use a data processor (e.g. supplier, accountant).

### Data processing

SYLVERRO Kft uses data processors for fulfilling orders (e.g. delivery) and for the proper operation of the company, who, according to the contract concluded with SYLVERRO Kft, perform the processing of data. Data is only processed in accordance with the purpose indicated by SYLVERRO Kft. For a different purpose, the data processor shall not use the data provided by the client.

For the operation of the webpage and the IT system SYLVERRO Kft is working with the following partners:

Webpage administrator and developer:

- Name: Planet & Fruit's Bt.
- Address: 1171 Budapest Nyitány utca 41/b
- Tax number: 20700991-2-42
- E-mail: sandornovak@digikabel.hu

Operation of the webpage and the mailing system:

- Name: DOTROLL Kft.
- Address: 1148 Budapest, Fogarasi út 3-5
- Tax number: 13962982-2-42
- E-mail address: [support@dotroll.com](mailto:support@dotroll.com)

Partner service provider for newsletter operation:

- Name: GrandSoft Kft.
- Address: 4400 Nyíregyháza, Csipke u. 14
- Tax number: 22992846-2-15
- E-mail address: [info@grandsoft.hu](mailto:info@grandsoft.hu)

Partner service provider for online card payment:

- Name: B-Payment Szolgáltató Zrt.
- Address: 1132 Budapest, Váci út 4.
- Tax number: 24722137-2-41
- E-mail address: [info@b-payment.hu](mailto:info@b-payment.hu)

SYLVERRO Kft works with the following transportation companies for the delivery of orders:

- Name: GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.
- Address: 2351 Alsónémedi, Európa u. 2.
- Tax number: 12369410-2-44
- E-mail address: [info@glshungary.com](mailto:info@glshungary.com)

The selection of the partners of SYLVERRO Kft was preceded by thorough preparation, and these partners are obliged to process the confidential data made available to them during the fulfilment of their duties and the provision of their services in compliance with the legal requirements and according to the data protection rules.

## Data security

SYLVERRO Kft takes all necessary steps to ensure the security of personal data provided by Users and Customers on the webpage, both during network communication and while storing and retaining the data.

Access to personal data is severely restricted in order to prevent unauthorised access, unauthorised modification or the unauthorised use of personal data.

## Client/Customer rights and enforcement options

### Right to information

The User and the Customer may at any time request information about the personal data processed by SYLVERRO Kft relating to them, furthermore, they can modify them at any time as specified in the GCTC.

If the User or Customer so requests, SYLVERRO Kft shall provide information on the User and Customer data processed by SYLVERRO Kft relating to the purpose, legal ground and duration of the data processing, as well as regarding who receives or has received their data and for what purpose.

SYLVERRO Kft shall provide the requested information within 30 days of the submission of the request.

The User or Customer may contact any of SYLVERRO Kft's employees in relation to data processing or with any observations, on any of the following contact details:

- Phone: +36 70 538 24 67
- E-mail: [info@molettdivat.hu](mailto:info@molettdivat.hu)
- Correspondence address: 2143 Kistarcsa, Baross G. utca 11.

The User or Customer may at any time request the rectification of incorrectly recorded data or their erasure, on any of the contact details listed below.

SYLVERRO Kft erases the data within 5 working days of receiving the request, in which case the data shall not be recoverable. The erasure does not apply to the data processing required by law (e.g. accounting regulations), they are retained by SYLVERRO Kft for the prescribed period of time.

The User or the Customer may also request that their data be blocked. Personal data shall be blocked by SYLVERRO Kft if so requested by the User or the Customer, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of the User or the Customer. Blocked personal data shall be processed only as long as the data processing purpose which prevented their erasure prevails.

When data are rectified, blocked or erased, the User or the Customer and all recipients to whom they were transferred for processing shall be notified. Notification is not required if it does not violate the legitimate interest of the User or the Customer in relation to the purpose of processing.

If SYLVERRO Kft refuses or is unable to comply with the User's or the Customer's request for rectification, blocking or erasure, the factual or legal reasons on which the decision for refusing the request for rectification, blocking or erasure is based shall be communicated in writing within 30 days of receipt of the request.

The User or the Customer may object to the processing of their Personal Data. SYLVERRO Kft shall review the objection within the shortest possible time or within no more than 15 days following the submission of the request, shall make a decision on its merits and shall notify the requestor in writing of its decision.

The data subject may enforce their rights through the following contact channels:

- Name: SYLVERRO Kft.
- Correspondence address: 2143 Kistarcsa, Baross G. utca 11
- E-mail: [info@molettdivat.hu](mailto:info@molettdivat.hu)

The User and the Customer may, pursuant to the Infotv. and the Civil Code (Act V of 2013),

1. enforce their rights before the Court, or
2. turn to the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/c; [www.naih.hu](http://www.naih.hu)).

Where the User or the Customer has provided third party data for the use of the service or caused any damage during their use of the [www.molettdiva.hu](http://www.molettdiva.hu) webpage, SYLVERRO Kft is entitled to claim damages against the User or Customer. In such cases, SYLVERRO Kft shall do its utmost to identify the offending party during the legal remedy proceedings.

## Other provisions

SYLVERRO Kft reserves the right to modify this Privacy Policy unilaterally assuming they have notified the Users or Customers in advance. Upon the entry into force of the amendment, by using the service and with their implicit conduct, the User or the Customer accept the modification of the Statement of Privacy.

SYLVERRO Kft does not verify the personal data supplied to it during registration. When a User or Customer provides their e-mail address or telephone number, they also certify that only they use the provided e-mail address or telephone number for the use of services. In view of that undertaking, any liability associated with any login made from the specified e-mail address shall lie with the person who registered the e-mail address.

By using the webpage, the registered User also certifies that the content modifiable by them and published on the webpage, and the provided data and information do not violate the legitimate interest of third parties or SYLVERRO Kft.

In these cases, SYLVERRO Kft shall provide all the assistance it can to the proceeding authorities in order to establish the identity of the offending party. SYLVERRO Kft is entitled to terminate the registration of the User in the above cases or if the provisions of the GCTC are not observed; in this case, SYLVERRO Kft shall not be liable for any damages resulting from the User's termination.

This Privacy Notice enters into effect on 24 May 2018.

