

PRIVACY NOTICE

In connection with the data processing carried out through the “Relaxie Market” webshop

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This privacy notice summarises the data processing activities that **Relaxie International Kft.** (registered seat: 5904 Orosháza, Aranyeső utca 22.), as data controller (hereinafter: "**Data Controller**") carries out in connection with the website available at www.rxiemarket.eu, which contains the Webshop named "**Relaxie Market**", and with its visitors and users (hereinafter: "**Data Subjects**").

The Webshop is a standalone, closed-access service that may be used only by Data Subjects holding specific and verified authorisation; its use and making purchases in the Webshop are subject to successful registration. Please read this privacy notice carefully, and should you have any questions regarding the processing of your personal data, please feel free to contact us through one of the contact details below.

1. The Data Controller

Data Controller: **Relaxie International Kft.**

Registered seat: 5904 Orosháza, Aranyeső utca 22.

Postal address: 5904 Orosháza, Aranyeső utca 22.

Represented by: Nikolett Nóvé, managing director

2. The personal data processed

Name of the data processing	Purpose of the data processing	Legal basis of the data processing	Scope of the personal data processed	Duration of the data processing	Recipients with whom we share the data	Measures taken to ensure the security of the data
Making contact and responding to enquiries, requesting quotes (on any interface)	The purpose of the data processing is for the Data Controller to make contact with you, to answer the questions you have submitted through the contact details you provided, to give quotes, and to stay in touch with you where necessary.	Your consent, Article 6(1)(a) GDPR; in the event of a contractual intention, preparation of a contract, Article 6(1)(b) GDPR	Name, contact e-mail address, possibly mailing address and telephone number, needs expressed	The Data Controller processes the personal data until the time your question or request is answered, then irrecoverably deletes it; in the case of a quote request, it retains the personal data for a period of 5 years from its collection (civil-law limitation period)	No disclosure of data takes place; however, in the case of an enquiry made through the website, the personal data may be shared with the website's hosting provider.	The Data Controller processes the stored personal data in a closed manner; only the staff members answering the question may access it. In the event of any incoming telephone call to the Data Controller, the Data Controller always requests separate consent in order to further store the personal data provided by the caller.

Registration and authentication	The purpose of the data processing is for you to establish a standalone, closed membership relationship connected to the Webshop, to create your own Customer account, and for the Data Controller to verify whether you meet the eligibility conditions determined in advance for joining the closed circle of persons of the Webshop.	Steps preceding the conclusion of a contract, Article 6 (1)(b) GDPR	E-mail address and OWWA e-card identification number (OWWA ID)	The Data Controller processes the data for the duration of the registered membership, until its termination (deletion of the registered account).	The personal data may be shared with the website's hosting provider. The data required for verification may, for the purpose of verifying the identification, be transferred or made accessible to the consulate of the foreign state concerned and/or to its verification system, solely to the extent necessary to carry out the eligibility verification. The data is verified through the Overseas Workers	The identifier is verified via an API connection, in an automated manner: The Data Controller transmits only the characters necessary for the eligibility verification to the verification system, which returns only feedback on the validity of the identifier; thus the Data Controller does not carry out independent identification of persons and does not process more data than is necessary for the verification. The Data Controller does not make copies of the cards.
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					Welfare Administration (OWWA), the organisation that administers and keeps records of the OWWA cards.	
Managing the registration account on the webshop	The purpose is to enable subsequent log-in, and the recording, keeping, and editing of purchase history and wish list, and the modification of personal data.	Performance of a contract, Article 6(1)(b) GDPR	Password for log-in, order history, wish list, contents of the basket, personal data necessary for placing an order.	We process the personal data related to the operation of the Customer account until the Customer account exists or until it is deleted.	The personal data may be shared with the website's hosting provider.	The Data Controller processes the stored personal data in a closed manner; only the authorised persons with the relevant remit may access it, and it discloses it to the competent authority only upon official request.
Data processing related to ordering and purchasing on the Webshop	Identification of the buyer and keeping in contact with the buyer during the fulfilment of orders and purchases made on the Webshop	Performance of a contract, Article 6(1)(b) GDPR	Name, e-mail address, delivery address, telephone number, product purchased, its price and method of	For 5 years following the termination of the contract.	Payment by bank card may take place using Apple Pay (Apple Inc.- Apple Distribution International Ltd.,	The Data Controller processes the stored personal data in a closed manner; only the authorised persons with the relevant remit may access it, and it discloses it

			payment, time of purchase		Hollyhill Industrial Estate, Cork, Ireland, https://www.apple.com/legal/privacy/hu/) or Google Pay (Google LLC - Google Payment Ireland Limited, 70 Sir John Rogerson's Quay Dublin 2 D02 R296 Ireland, https://policies.google.com/privacy?hl=hu)), so Google Payment Ireland Ltd. and Apple Distribution International Limited process your personal data in	only upon official request to the competent authority. The delivery and payment service providers used by the Data Controller are deemed to be reliable.
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					accordance with their own data processing rules; in addition, during delivery the Data Controller transfers the personal data to its respective delivery partners and suppliers, which also vary by product, and therefore the delivery data is shared with them. The orders are handled by Shopify's system, and therefore the data is also shared with Shopify International Ltd.	
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					https://www.sopify.com/legal/privacy). These partners process the personal data in accordance with their own internal rules, which are independent of the Data Controller.	
Data processing related to accounting documents issued and received	Handling of the accounting documents issued and received, and execution of payments, in order to fulfil the bookkeeping obligation set out in the Accounting Act.	Compliance with a legal obligation, Article 6(1)(c) GDPR Basis: Act C of 2000 on Accounting, Section 169; NGM Decree No. 23/2014 (30 June)	Name, billing address	With respect to personal data appearing on accounting documents, the lapse of the 8th year from the issuance of the document	National Tax and Customs Administration, accounting bank (ERSTE Bank Hungary Zrt., Raiffeisen Bank Zrt.), the respective accountant, invoicing software (számlázz.hu - Kboss.hu Kft.)	The Data Controller keeps the issued accounting documents in a locked room and/or on its own server; only the staff members with the relevant remit may access them.

Submission and handling of product reviews	Enabling registered Customers to give a rating of between 1 and 5 stars to the Products available in the webshop, aggregating and displaying the reviews by product, and ensuring the proper functioning of the review system.	Legitimate interest of the Data Controller, Article 6(1)(f) GDPR The legitimate interest of the Data Controller is to provide Customers with the possibility to review the products, to support Customers' purchasing decisions, and to operate the review system.	Technical account identifier, identifier of the reviewed product, the star rating submitted, the time of the review.	Until the review is deleted.	The personal data may be shared with the website's hosting provider. personal data.	To other Customers, the webshop does not display the name or any other direct identifying data of the person submitting the review; only the aggregated result and the number of reviews are displayed. The Data Controller does not identify, keep records of, or verify the persons submitting reviews.
Handling of consumer complaints	Ensuring the possibility to report consumer-protection complaints and claims,	Compliance with a legal obligation, Article 6(1)(c) GDPR	Name, residential address, e-mail address, content of the complaint,	For 3 years from the date of the record.	On a case-by-case basis, to the competent consumer-	The Data Controller processes the stored personal data in a closed manner; only the authorised persons

	responding to and assessing them, and keeping records	Basis: Act CLV of 1997 (Consumer Protection Act), Section 17/A (5), (7)	time the complaint was lodged, date of the record, content of the documents forming part of the complaint, identifier of the complaint, signature of the person keeping the record		protection or other authority.	with the relevant remit may access it, and it is disclosed to the competent authority only upon official request.
Handling of consumer warranty claims	Ensuring the possibility to report consumer-protection warranty and guarantee claims, responding to and assessing them, and keeping records	Compliance with a legal obligation, Article 6(1)(c) GDPR Basis: NGM Decree No. 19/2014 (29 April), Section 4	Name, residential address, time of performance, time the defect was reported, description of the defect, right to be enforced and the manner thereof, content of the response, nature of the	For 3 years from the date of the record.	On a case-by-case basis, to the competent consumer-protection or other authority.	The Data Controller processes the stored personal data in a closed manner; only the authorised persons with the relevant remit may access it, and it is disclosed to the competent authority only upon official request.

			service, signature of the person keeping the record			
Making declarations of withdrawal	Providing a declaration of withdrawal and a withdrawal function and enabling withdrawal, in order to comply with consumer-protection requirements, pursuant to Section 20 of Government Decree No. 45/2014 (26 Feb.)	Compliance with a legal obligation, Article 6(1)(c) GDPR Basis: Government Decree No. 45/2014 (26 Feb.), Section 22 and Annex 2	Online withdrawal function: Name, order identifier, e-mail address, time of withdrawal Paper-based declaration of withdrawal: Name, address, signature, time of conclusion of contract/receipt	Until the lapse of 5 years from the withdrawal.	No disclosure of data takes place.	The Data Controller processes the stored personal data in a closed manner; only the authorised persons with the relevant remit may access it, and it is disclosed to the competent authority only upon official request.
Data processing related to the use of cookies on the website	Keeping records of the acceptance of the cookies used on the website, ensuring browsing and sessions on	Your consent, Article 6(1)(a) GDPR; in respect of cookies essential for	IP address, as well as other personal data stored by the individual cookies (e.g.: start and end time	The cookies essential for the use of the website are automatically deleted when each session is	As a general rule, no disclosure of data takes place; however, it may occur that, when	In the course of operating its IT systems, the Data Controller provides the necessary access-management, internal

	the website, and supporting and analysing its traffic and use	the use of the website, the legitimate interest of the Data Controller, Article 6(1)(f) GDPR	of the visit, in certain cases the type and language of the browser and operating system, device parameters, settings specified by the Customer, pages visited). In the Chrome browser, the current list of cookies can be checked by clicking, in the right-hand corner of the website, on "More tools", "Developer tools" buttons Through the statistical and marketing cookies, personal data is shared with	closed; the functional cookies are stored until tracking is stopped	the website is visited, other service providers also place cookies on the data subject's computer for the purposes of analysis, the collection of statistical data, and remarketing. In this respect, Google also processes your data. Data related to cookie management may be shared with the websites' hosting providers.	organisational and technical solutions to ensure that your data cannot come into the possession of unauthorised persons
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			Google Ireland Ltd. in connection with the use of the Google Analytics service.			
Retention of documents beyond the period of performance of the contract in order to facilitate proof in any legal proceedings	In the case of certain data processing activities set out in this notice, the Data Controller retains the documents for a period of 5 years following the termination of the contract in order to enable the data contained in the documents to serve as evidence in any legal proceedings that may arise	Legitimate interest of the Data Controller, Article 6(1)(f) GDPR	Personal data appearing in contracts and quotes	Until the lapse of 5 years from the termination of the contract (or other legal basis of the data processing)	Disclosure of data may take place if the Data Controller uses the documents in any proceedings	The Data Controller processes the stored personal data in a closed manner; only the authorised persons with the relevant remit may access it
Data processing necessary for the conduct of litigation and	Initiating contentious and non-contentious proceedings and	Legitimate interest of the Data Controller,	Personal data that varies from case to case and is	The personal data is retained for as long as its retention is	Disclosure of data may take place if the Data	The data may be accessed only by the persons who take part in the

out-of-court proceedings and legal proceedings, and for the enforcement of claims	processes, providing evidence in the proceedings, and collecting receivables	Article 6(1)(f) GDPR	necessary for the conduct of the given proceedings	necessary for the initiation, conduct or completion of the given proceedings or for the collection of a claim	Controller uses the documents in any proceedings (authorities, attorney, debt-management company)	conduct of the proceedings or who have a legitimate interest in the conduct of the proceedings.
Data processing related to the exercise of data subject rights	For the purpose of fulfilling requests in the course of the exercise of data subject rights	Compliance with a legal obligation, Article 6(1)(c) GDPR Basis: Articles 15–21 GDPR	Data necessary for identifying the data subject and for keeping in contact with them (name, telephone number, e-mail address)	During the exercise of the data subject right, until it is fulfilled	No disclosure of data takes place	The personal data may be accessed only by the authorised staff members.
Data processing related to consent and acceptance declarations	Evidencing, in the interest of the Data Controller, the giving or withholding of consents and the acceptance or non-acceptance of the GTC	Legitimate interest of the Data Controller (Article 6(1)(f) GDPR)	Technical and system data, as well as data relating to the making of the consent or acceptance declaration (the fact and	Until the consent is withdrawn, or until the data processing underlying the consent or acceptance is completed.	The hosting provider may possibly access technical, system or log data.	The Data Controller processes the stored personal data in a closed manner; only the person with the relevant remit may access it, having regard also to the

	and the Notice. It is in the legitimate interest of the Data Controller to be able to demonstrate that, during the use of the Webshop, you have become acquainted with and accepted the GTC and this Notice or, where necessary, have given your consent.		time of its giving)			principle of data minimisation. The acceptance and consent declarations are given by means of a checkbox that can be ticked, and the Data Controller does not link them directly to personal identifying data.
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3. Data processors, transfer of data

The Data Controller may hand over the personal data you have provided to the competent authority, court or applicant in the event of a request from an authority or a court, or in justified cases in order to protect the rights and freedoms of the Data Controller or others.

The Service Provider uses the Shopify e-commerce platform to operate the Webshop. Shopify acts as the Service Provider's data processor in order to ensure the technical operation of the Webshop and to handle the data related to orders – in particular contact, billing, delivery and order data. In connection with the operation, development, bug-fixing and provision of the webshop, the Data Controller therefore cooperates with its data processor partner Shopify International Ltd. (registered seat: 2nd Floor 1-2 Victoria Buildings

Haddington Road Dublin 4, D04 XN32 Ireland), in the course of which the data and content recorded on the webshop may be shared with the data processor.

As the hosting service for the website, and for the cloud-based storage of personal data, the Data Controller uses the Amazon Web Services (AWS) cloud/hosting service provided by Amazon Web Services EMEA SARL (ARNOLDGLEIS 1, 60388 Frankfurt am Main, Germany, <https://aws.amazon.com/privacy/>), and therefore all personal data is shared with this service provider.

It may occur that, when the websites are visited, other service providers place cookies on your computer for the purposes of analysis, the collection of statistical data, and remarketing. In this respect, Google (Google Ireland Ltd.) may also process your data in accordance with its own data protection rules.

To verify eligibility for the discounts, the Data Controller carries out the verification through the records of the Overseas Workers Welfare Administration (OWWA Center Building F.B. Harrison St, Pasay, Metro Manila, OWWA), an agency belonging to the Government of the Philippines that serves the welfare of overseas Filipino workers (OFW) and their family members. The verifying body determines, on the basis of its own verification logic and its own internal rules, whether the identifier is valid; no data processor relationship is established with the organisation.

Data subjects may turn directly to any Data Controller with regard to the handling of data protection matters.

4. Data security measures

In order to protect its systems, the Data Controller applies documented technical and organisational measures at its registered seat to prevent unauthorised access to the data.

In order to guarantee an appropriate level of data security, the Data Controller has assessed the risks arising in connection with its data processing activities and has evaluated them from the perspective of the severity of the risks and the likelihood of their occurrence, according to various criteria.

The Data Controller provides, in the course of operating its IT systems, the necessary access-management, internal organisational and technical solutions to ensure that your data cannot come into the possession of unauthorised persons and that unauthorised persons cannot delete, export from the system, or modify the data. We also enforce the data protection and data security requirements towards our data processors by means of a prior assessment and a data processing agreement.

In providing the discounts, the Data Controller cooperates only with partners who apply the same high-level protective measures as the Data Controller in respect of their clients and their own contributors. In the course of transferring data to partners, only

partners that provide appropriate data security guarantees may be recipients, including, where applicable, organisations within the EU, as well as compliance under the Data Privacy Framework. The Data Controller concludes a data processing agreement with its data processors, where one is not already in place.

We keep records of any personal data breaches and, where necessary, inform you of any breaches that arise.

The internet communication between the Data Controller and the person visiting the Data Controller's website takes place end-to-end encrypted, via the https (http+ssl) protocol.

The bank card data provided when paying on the website is handled not by the webshop but by an external, reliable payment service provider; the Data Controller therefore uses secure payment systems.

The Data Controller applies password protection on its computers and equips its IT devices with intrusion protection.

The computers owned by the Data Controller are provided with an appropriate password, and its data storage devices are destroyed on the basis of a disposal protocol established for this purpose.

Sending a confirmation e-mail and confirming the registration in order to verify the authenticity of the e-mail address provided during registration in the webshop and to prevent unauthorised registrations

5. The data subjects' rights

You are entitled at any time to request **information** by post, electronically or by telephone, through the contact details indicated in the notice, about the personal data concerning you that we process.

Upon your request, we inform you of:

- the data processed,
- the purpose of the data processing,
- its legal basis,
- its duration,
- who receives or has received your data and for what purpose.

We provide the information in writing within one month of the submission of the request, on paper or electronically, depending on the form in which the information was requested.

You may at any time **object** to the processing of your personal data. We examine the objection within the shortest possible time from its submission, but at most within one month, take a decision on the question of its merits, and inform you of the decision.

You are entitled at any time to request the **erasure** of the personal data we process, or the **rectification** of incorrectly recorded personal data.

In addition, we **restrict** the processing of your personal data if you so request, or if, on the basis of the information available to us, it can be assumed that erasure would harm your legitimate interests. We process the personal data thus blocked for as long as the purpose of the data processing or the legitimate interest that precluded the erasure of the personal data exists.

The data subject may, through the contact details provided in this notice, request that the Data Controller **restrict** the processing of their personal data (by clearly marking the restricted nature of the processing and by ensuring that it is handled separately from other data) if

- they contest the accuracy of their personal data (in which case the Data Controller restricts the processing for the period during which it verifies the accuracy of the personal data);
- the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of its use instead;
- the Data Controller no longer needs the personal data for the purpose of the processing, but the data subject requires it for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing (in which case the restriction applies for the period until it is established whether the legitimate grounds of the data controller override the legitimate grounds of the data subject).

Through the contact details provided in this notice, you are entitled to receive the personal data concerning you that you have provided to the Data Controller in a structured, commonly used, machine-readable format, and you are further entitled to **transmit** this data to another data controller without being hindered in doing so by the Data Controller.

We comply with requests for access, erasure, rectification, restriction, data portability and blocking as soon as possible, but at most within one month, and notify you. If we were unable to grant your request, we notify you within one month in that case as well.

If we transferred the data to another person with your consent, we also notify the recipient of the data transfer of the necessary steps.

If we process your personal data on the basis of your consent, you are entitled to withdraw your consent at any time. You may withdraw your consent by contacting the Data Controller through the contact details set out in this notice, and where otherwise justified the Data Controller ensures that you can also withdraw the consent given to the data processing by simpler means.

If you are visually impaired or elderly, you may request from the Data Controller – through the contact details set out in this Privacy Notice – that the content of the Privacy Notice be made available in word (text) format or in a large-print version.

In addition, you are **entitled to bring your complaint before the Hungarian National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11.;

www.naih.hu,

Telephone: +36 (1) 391-1400

E-mail: ugyfelszolgalat@naih.hu)

, or to enforce your rights relating to the processing of personal data before the **court** having competence and jurisdiction under Act CXXX of 2016 on the Code of Civil Procedure.

You can find the competent court at the following link:

<https://birosag.hu/birosag-kereso>

You may exercise the rights listed in this notice at any time towards any Data Controller or all Data Controllers, provided that you contact the Data Controller by e-mail or otherwise in writing. In connection with your request, the requesting person may be

asked to identify themselves or to provide such other data concerning their person as serves to verify the entitlement. We handle the request in the manner specified in the "Making contact" section of this privacy notice.

You may contact the Data Controller through the contact details set out in section 1.

Relaxie International Kft.

Data Controller