

# Privacy Policy

## Data Protection Notice

This data protection notice specifies the purpose of the processing of personal data and provides further information related to the data processing by the **S.G.S. International Orvosi Eszközök Gyártó és Forgalmazó Kereskedelmi Korlátolt Felelősségű Társaság** (seat: 1047 Budaest, Károlyi István utca 1-3., company registration number: 01-09-880237, registered by: Company Court of Budapest Tribunal, tax number: 13926454241., e-mail address: info@sgs-dental.com) (hereinafter referred to as "**Controller**" or "**we**") and with regard to its related website, functions and contents (hereinafter jointly referred to as "**Website**").

Please read our provisions carefully and if you have any questions or requests in connection with the data processing of the Controller, please contact us using the contact details below:

### **S.G.S. International Orvosi Eszközök Gyártó és Forgalmazó Kereskedelmi Korlátolt Felelősségű Társaság**

Address: Hungary, 1047 Budaest, Károlyi István utca 1-3.

E-mail address: info@sgs-dental.com

#### 1. What do we do to protect your data?

The Controller undertakes to protect your personal data, therefore it endeavors to ensure that it processes your personal data in accordance with legal requirements. The Controller follows the following principles in the context of data processing:

- It will only process personal data lawfully.
- It will process personal data only for a specific purpose and in an economical and limited period.
- It protects your personal data.
- It supports you in enforcing your rights in relation to data processing.

#### 1. In which cases does the Controller process your personal data?

##### 2.1. Operation of the Website and registration on the Website

**For what purpose do we process your data?** The purpose of data processing is the operation of the Website, the administration of registrations, and fulfilment of orders. In this respect, it is highlighted that only registered users are able to shop at the website.

The Controller processes your data for the above-mentioned purpose

· processing is necessary for the performance of a contract to which the natural person partner as data subject is party or in order to take steps at the request of such data subject prior to entering into a contract (Art. 6 (1) b) of the GDPR).

· processing is necessary for the establishment or the performance of a contract with a company or other legal entity, which is the legitimate interest of the Controller and such company/entity (Art. 6 (1) f) of the GDPR). Legitimate interest: the successful establishment and performance of such contract and supporting the cooperation of the parties.

**What is the legal basis for processing your data?**

· based on the user's consent, which the user gives when registering on the Website, in cases, where no contract is to be established or performed with the user/visitor or the company/entity represented by him/her, or where the user provides telephone number for communication purposes (Art. 6 (1) a) of the GDPR).

· The processing is necessary to fulfill a legal obligation to which the Controller is subject (e.g. storage of invoice information for tax and accounting purposes) (Art. 6 (1) c) of the GDPR).

**Do you have to provide your data?**

You are free to choose to register on the Website and share information. For registration, however, you must request a password on the Website and give your name and email address. For making communication with the Controller easier, you are also free to give your telephone number during registration on the Website or a later communication with the Controller.

In addition, the Controller processes your data with a view to compliance with his legal obligations (Art. 6 (1) c) of the GDPR), including tax and accounting obligations, in which case the data processing is binding.

We process the following personal data in connection with the operation of the Website and with the administration of the registrations:

- the user's name and e-mail address, as well as the password created during the registration;
- the telephone number of the user (if provided);

**What data do we process?**

- in case of a user representing another person/entity, the contact details of such person/entity;
- in case of ordering from the Website, the address of the user;
- communication related to the Website, business and professional information shared between the Controller, as well as the users or other partners (e.g. plans on mining operations and related business projections).

We process the following personal data in connection with the storage of billing information for tax and accounting purposes:

We store the name, email address and the password of the user for the administration of his/her registration as long as he/she is registered on the Website. This also means that he/she can delete his/her registration at any time or request the deletion of registration by email sent to the Controller (revocation of consent in case of data processing by consent) or the Controller and its related partner can decide to communicate on another platform or by another way (e.g. by email). In case, where data processing is based on consent, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The information shared on the Website by a given user shall also be deleted in cases when the related registration is deleted.

**How long do we store your data?** In the event of a dispute initiated by the user or the company/partner represented by him/her or the process of a court or authority that affects the registration or the information the user has shared, we may store the personal data concerned until the competent court or authority makes a final decision in the given case or until this court or authority orders so. This data storage is based on our legitimate interests (Art. 6 (1) f) of the GDPR) in order to protect our professional reputation and business interests and to defend ourselves against the claims of data subjects (natural person users) or third parties.

Insofar as your data is required to meet the accounting and taxation requirements of the Controller: the storage period, which is prescribed in the relevant accounting and tax regulations (8 years at most with regard to the laws of Hungary).

**The recipients of your personal data in the event of data transfer** Your data can be passed on to the courier companies for the delivery of products.

We will inform You the details of the courier company after confirming Your order and delivery.

## **2.2. Data processing of inquiries and complaints received by the Controller, data processing in connection with a data breach, enforcement of claims**

**For what purpose do we process your data?** Inquiries received by the Controller (e.g. inquiry in connection with the Website or the related services or activities) and answering complaints, any comments and compliance with the legal obligations applicable to the Controller in the event of a data breach, assertion of the legal claims of the Controller.

**Data processing related to answering inquiries, comments and complaints:** Data will be processed by the Controller based on the Controller's legitimate interests (Art. 6 (1) f) of the GDPR). Legitimate interests: processing inquiries sent to those responsible, answering questions, complaints. We highlight in this respect that in terms of data processing related contractual and pre-contractual communication with natural person users (Art. 6 (1) b) of the GDPR) or with users representing companies and other persons (Art. 6 (1) f) of the GDPR), more information can be found under Section 2.1.

**What is the legal basis for processing your data?** **In the case of processing the data subject's request (Art. 12 GDPR),** the processing is necessary to fulfill a legal obligation to which the Controller is subject (e.g. responding to the data subject's request related to the exercise of data protection rights, facilitating the related exercise of the data subject's rights according to Articles 15 to 22 of the GDPR) (Art. 6 (1) c) of the GDPR).

**Enforcement of claims:** processing is necessary to safeguard the legitimate interests of the Controller (Art. 6 (1) f) of the GDPR). Legitimate interests: storage and processing of the data (including inquiries or questions from the data subjects) to protect against claims of data subjects and third party claims (e.g. if the data of another person is provided by the data subject without his/her permission).

**Data processing concerning data breaches:** in case of a data breach, the data processing is necessary for compliance with a legal obligation to which the Controller is subject (Art. 6 (1) c) of the GDPR), including the notification of personal data breach to the supervisory authority in accordance with Art. 33 of the GDPR.

**Do you have to provide** Naturally, the user or another person acting on his/her behalf does not have to make any inquiries or file a complaint. However, if he/she sends a request or complaint to the Controller, the Controller will process his/her personal data for

**your data?** the management of the request or complaint, for the protection of its interests and for the fulfillment of its legal obligation as described above.

**What data do we process?** Personal data that are affected by a request to the Controller or a complaint, the contact details of the data subjects (users) and the persons they represent (name, email address) or their representative's (e.g. lawyer representing the user) contact details, the inquiries (complaints) of the data subjects and their content and the recording of the steps taken in relation to the request or complaint.

We process the user's name, email address and your other data mentioned above, as well as the other personal data regarding a legal dispute against the Controller or concerning a procedure initiated by it.

**How long do we store your data?** In the event of a dispute initiated by you or the process of a court or authority that affects the above data (e.g. your complaint), we may store the personal data concerned until the competent court or authority makes a final decision in the given case or until this court or authority orders so. This data storage is based on our legitimate interests (Art. 6 (1) f) of the GDPR) in order to protect our professional reputation and to defend ourselves against the claims of data subjects or third parties.

In the event that processing is necessary to comply with a legal obligation, including reporting personal data breaches, notifying the data subject of a personal data breach or responding to the data subject's request and facilitating the exercise of the data subject's rights under Articles 15 to 22 of the GDPR (e.g. within the framework of the user's request for rectification), the Controller stores the personal data concerned as long as this is necessary to comply with these legal obligations.

**The recipients of your personal data in the event of data transfer** Your data can be passed on to the courier companies for the delivery of products.

We will inform You the details of the courier company after confirming Your order and delivery.

### **2.3. Data processing related to mergers, acquisitions and business arrangements**

In case of a merger, acquisition or another business arrangements involving the Controller, the personal data of users and other data subjects affected by the Controller's activities may be transferred to or accessed by third parties. Such cases especially include the acquisition of the website and related business operations, a business branch or establishment of the Controller by another entity, merger of the Controller and another entity or acquisition of the Controller by another entity. In these cases, the transfer of the relevant personal data or the provision of access to them is necessary to serve the legitimate business, professional and organizational interests of the Controller and the related other entity (Art. 6 (1) f) of the GDPR).

#### **1. Data transfer and data storage in third countries**

The Controller stores the personal data at its seat, in Hungary and does not further transfer personal data to other third countries outside of the EU. In case, when data transfer to any third country outside of the EU becomes necessary (e.g. to an authority in a third country outside of the EU), the Controller shall provide the necessary relevant information to the data subject affected by the transfer.

#### **1. Contact for exercising data protection rights**

Each time you contact us for exercising your data subject rights under Art. 15 to 22 of the GDPR, your information necessary for processing your request will be processed in accordance with Art. 6 (1) c) of the GDPR (a legal obligation to which the Controller is subject). The purpose of such data processing is to respond to the data subject's request and to facilitate the exercise of the data subject's rights in accordance with Art. 15 to 22 of the GDPR (Art. 6 (1) c) of the GDPR).

#### **1. Rights and remedies of data subjects**

Answering the user's or other data subject's (your) data protection inquiries or completing your request is free of charge. However, if your request to exercise your data protection rights is manifestly unfounded or excessive (e.g. in the case of frequent submission of unsubstantiated requests), we are entitled to either charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on the request.

The data protection rights and remedies of the data subjects (including yours if the person responsible processes your personal data) are listed in the relevant provisions of the GDPR (in particular Art. 15, 16, 17, 18, 19, 20, 21, 77, 78, 79, 80 and 82 of the GDPR). The following is a summary of the key provisions and, accordingly, the controller will inform data subjects about their rights and remedies regarding data processing.

The Controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the Controller does not take action on the request of the data subject, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

#### **Right of access by the data subject**

You shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
5. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing;
6. the right to lodge a complaint with a supervisory authority;
7. where the personal data are not collected from you, any available information as to their source.

Where personal data are transferred to a third country, you shall have the right to be informed of the appropriate safeguards relating to the transfer.

The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by you, the Controller may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form.

#### **Right to rectification**

You shall have the right to obtain from us the erasure of personal data concerning you without undue delay and we shall have the obligation to erase personal data without undue delay where one of the following grounds applies.

Please note that by reporting a change in your personal information, you can help us to get accurate information about you at any time.

#### **Right to erasure**

You have the right to request that the Controller delete personal data concerning you immediately and the Controller is obliged to delete personal data immediately if one of the following reasons applies:

1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
2. you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing;
3. you object to the processing and there are no overriding legitimate grounds for the processing, or you object to the processing;
4. the personal data have been unlawfully processed;
5. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
6. the personal data have been collected in relation to the offer of information society services.

#### **Right to restriction of processing**

You shall have the right to obtain from the Controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling the Controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; or
- you have objected to processing pending the verification whether the legitimate grounds of the Controller override those of you.

#### **Withdrawal of consent**

Where processing is based on your consent, you shall have the right to withdraw your consent at any time. We highlight that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

For more information on the cases in which the Controller carries out data processing with your consent, you can find more information in the sections "What is the legal basis for processing your data?" above.

#### **Right to data portability**

##### **Complaint**

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

A list of the supervisory authorities (for the non-public area) with address can be found at [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

The data protection supervisory authority responsible at the address of the Controller is the Hungarian National Authority for Data Protection and Freedom of Information (in Hungarian: "Nemzeti Adatvédelmi és Információszabadság Hatóság")

Postal address:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Address: Hungary, 1055 Budapest, Falk Miksa utca 9-11.

Postal address: Hungary, 1363 Budapest, Pf.: 9.

Telephone +36 (30) 683-5969

Fax +36 (1) 391-1410

[ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

<https://www.naih.hu/>

#### **Withdrawal of consent and objection**

**You can withdraw your consent (Art. 7 (3) of the GDPR) at any time for the future (in cases where data processing is based on consent) or object to our processing, which is based on our legitimate interests (Art. 6 (1) f) of the GDPR). You can send the withdrawal or the objection either by e-mail or by post or through the Website to the extent permitted by it using the contact details above.**

**As regards objection, the Controller shall no longer process your personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the**

**establishment, exercise or defence of legal claims.**

**1. Amendment of the data protection notice**

We reserve the right to change the data protection notice in order to adapt it to changes concerning the relevant laws, new court or authority practice or in the event of changes to the data processing practice. If user consent is required, the changes will only be made with the consent of the user.

Users are asked to inform themselves regularly about the content of the data protection notice.