



gardyjohanna.com

Based on the service provider's registered office, the Data Management Policy is primarily based on European Union legislation, with particular regard to Regulation [EU 2016/679](#) – GDPR. The regulation ensures the protection of natural persons' data regardless of their nationality or place of residence.

I. Concepts under the GDPR

Personal data: means 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, an identification number, location data, an 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: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Pseudonymisation: means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Controller: means 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 nomination may be provided for by Union or Member State law.

Third party: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Consent: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Cross-border processing: processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

II. Data processing

1. Controller

Data processing is carried out by the Service Provider itself at its own headquarters.

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2. Purpose of data processing

2.1. Data processing and storage is carried out with regard to the following data necessary for its activities:

- data provided at registration for login to the online store
- processing of data necessary for purchases in the web store
- email addresses for occasional marketing purposes.

2.2. Failure to provide data makes it impossible for the Service Provider and Data Controller to fulfill their legal and contractual obligations, as well as the buyer's right to legal remedy, so in the absence of this, purchases cannot be made on the gardyjohanna.com web store interface.

3. Third parties

The legal basis for data transfers related to credit card payments is the legitimate interest of the Data Controller in fulfilling orders.

4. General provisions

4.1. Responsibility for the authenticity of personal data

4.1.1. The Service Provider shall not be responsible for and shall not verify the authenticity of the data provided to it; the person providing the data shall be responsible for it.

4.1.2. If, for example, the buyer does not provide their personal data when making a purchase because it is a gift, the buyer is obliged to ensure that they have authorized the provision of data belonging to a person other than themselves.

4.2. Storage and processing of personal data

4.2.1. The Data Controller shall treat the personal data provided as confidential and shall not use it for any other purpose. According to the provisions of the GDPR, the following shall not be considered incompatible with the original purpose: further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

4.2.2. The Data Controller shall not engage in profiling.

4.2.3. The Data Controller shall process the data under a pseudonym.

5. Correction of data, withdrawal of consent to data processing

5.1. Duration of data processing

In order to preserve registration information and ensure the visibility of purchase history, there is no predetermined expiry date for data processing.

5.2. Correction of data

The natural person concerned has the right to request the correction of incomplete personal data concerning him or her.

5.3. Provision of data

The natural person concerned may request the Data Controller to provide him or her with a copy of the data stored about him or her.

5.4. Restriction of data processing

The natural person concerned may request the restriction of the processing of data stored about him or her:

5.4.1. if the data subject disputes the accuracy of the data processed, in which case the restriction shall remain in force until the accuracy of the data has been verified.

5.4.2. if the data processing is unlawful, but the data subject opposes its erasure.

5.5. Withdrawal of consent

The natural person concerned has the right to request the deletion of data stored about them. This cannot be revoked, and it is the responsibility of the natural person to assess any potential damages arising from this in advance.

6. Supervisory authority

Hungarian National Authority for Data Protection and Freedom of Information

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