

## Privacy Statement

### General provisions and principles

BoxByK Kft., the operator of [www.cbkhungary.com](http://www.cbkhungary.com) is committed to respect all self-determination rights of users and/or visitors and protect all rights related to personal data and information in a regulated manner. According to the above, BoxByK Kft. takes all measures necessary to guarantee the security of data.

All personal data provided is processed confidentially and shall not be passed to any third party. This obligation is to be waived in case the personal data is required for completion of service (i.e.: courier service for delivery), or it is mandatory by law.

Through any activity on [www.cbkhungary.com](http://www.cbkhungary.com), including registration and / or ordering any service from [www.cbkhungary.com](http://www.cbkhungary.com), all visitors, registered users, recipients of service and customers agree to the provisions and contents of this Privacy Statement and consider all provisions hereby legally binding.

The provisions and principles in this Privacy Statement are generally applicable with exception to cases where other terms are set forth in any contract and/ or agreement made between BoxByK Kft. and any other party.

### Applicable legislation

All data provided through use of [www.cbkhungary.com](http://www.cbkhungary.com) the website is protected in accordance with the applicable legislation:

- Act LXIII. of 1992 on protection of personal data and disclosure of public data
- Act CVIII. of 2001 on e-commerce services, and certain aspects of information society services
- Act CXII. of 2011 on self-determination rights and freedom of information
- Act XLVII. of 2008 on the prohibition of unfair commercial practices against consumers
- Act XLVIII. of 2008 on the basic requirements and certain restrictions of commercial advertising activities (with special attention to section 6)
- Act XC. of 2005 on freedom of electronic information
- Act XCII. of 2003 on taxation
- Act C. of 2000 on accounting
- Recommendation by the National Authority for Data Protection and Freedom of Information (NAIH) on privacy requirements of prior notification
- Review no. 16/2011 on EASA/ IAB recommendation on practices of online behavioral advertising

### Visiting the website

The [www.cbkhungary.com](http://www.cbkhungary.com) website can be visited without restriction. Visitors are not required to share any personal data with BoxByK Kft. Some data will be automatically collected and recorded by the website, but this data will not be used or processed as personal information linked to the visitor.

In case the visitor provides personal data through registration or other activity (i.e.: filling out a form, sending an e-mail) the visitor automatically agrees to the processing, recording and handling of the data provided.

### Range of managed data

By using the [www.cbkhungary.com](http://www.cbkhungary.com) website the following range of managed data has been identified:

- Range of data related to contact BoxByK Kft.
  - Name (given name and family name)
  - E-mail
  - Message

### **Purpose and legal basis of data management**

BoxByK Kft. only manages the data required for successful completion of service. All data management is to be approved by the user as stated in the Privacy Statement. The purpose of data management is the following:

- **Identification of user:** For successful completion of service unique user identification and direct communication with the user is required.
- **Identification of eligibility of user:** For identification of eligibility of user for specific services and functions.
- **Building statistics and reports:** Statistics, reports and analytics for developing the site and services provided.
- **Communication through customer service:** Providing the highest possible level of service to customers.
- **Sending system messages and notifications in relation to the service provided:** Serving the interest of the user, providing up- to- date information of the service ordered.
- **Direct marketing (i.e.: newsletter):** If approved by user, personal data is required for sending newsletters.
- **Forming an online community, identification by each other, providing a platform for users to connect with each other, providing a platform for user made contents to be published and shared:** Any social media is not connected to using website, connecting the platforms is up to the user
- **Organizing community events**
- **Management and disclosure of data in accordance with the applicable legislation:** The data provided by user during registration and/ or purchase is used by BoxByK Kft. for successful completion of service. The invoice created upon purchase is recorded and stored for the time period specified in the Accounting Act in force.

### **Automatically recorded data, cookies**

For statistical purposes during browsing the [www.cbkhungary.com](http://www.cbkhungary.com) website technical information will be recorded (i.e.: IP address, number of daily visitors, time per visit). The collected data is measured and analyzed, enabling BoxByK Kft. to develop products and services based on customer needs. The collected data will not be linked to users; the user will not be identified.

The collected data shall only be handed over to the authorities when legally justified and warranted.

In order to access the service provided, the user has to enable the use of cookies. In case the user does not wish to do so, the use of cookies could be disabled in the settings of the browser. Please note that in case the use of cookies is disabled some services might partially or completely be inaccessible. Cookie is a file sent by the server and being stored on the device used by the user. The cookie files do not contain any personal data.

### **Newsletter**

In accordance with section 6 of Act XLVIII: of 2008 on the basic requirements and certain restrictions of commercial advertising activities, upon prior and direct approval from the user, the provider is authorized to contact the user with offers or advertising materials using the contact information (e-mail address, phone number) provided by the user during registration.

For receiving complimentary items the user shall agree to the management and handling of personal data by BoxByK Kft. in accordance with the provisions of the Privacy Statement.

The user can subscribe to the CBK Hungary newsletter at [www.cbkhungary.com](http://www.cbkhungary.com). All data provided by the user during the subscription process are subject to the provisions of the Privacy Statement. The user is able to unsubscribe from the CBK Hungary newsletter via any contacts listed on the [www.cbkhungary.com](http://www.cbkhungary.com) website or via the link contained in the newsletter.

BoxByK Kft. does not send unwanted advertising materials.

## **Contacting the user for marketing purposes, advertising**

The user will only be directly contacted by BoxByK Kft. The managed data, contact information provided by the user will not be passed to a third party for marketing and advertisement purposes.

## **Social media**

Recording data, range of data collected: registered username and public profile picture of user on the following social media sites: Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. .

Users involved: all users registered on Facebook/Google+/ Twitter/Pinterest/Youtube/Instagram etc., who liked the [www.cbkhungary.com](http://www.cbkhungary.com) website.

The purpose of collecting the data listed above is marketing and advertising the content, products and services included and listed on [www.cbkhungary.com](http://www.cbkhungary.com).

## **Google Adwords**

BoxByK Kft. uses the Google AdWords service and the included conversion tracking. Conversion tracking is the analytics tool provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; „Google“).

When a website is accessed through a Google advert a conversion tracking cookie is sent to device used by the user. The cookie does not include any personal data; the user could not be identified. The validity of the cookie is limited.

In case the validity of the conversion tracking cookie has not expired, during the browsing of the website the user is visible for both the data holder and Google.

All customers of Google AdWords receive a unique cookie file which could not be tracked through the customer's website.

The information provided by Google AdWords is used for building statistics and reports. Google AdWords customers are able to determine the number of users forwarded to their website through Google adverts. The customers of Google AdWords do not receive personal data and information of the user; the user could not be identified.

If you do not wish to take part in conversion tracking, you can disable the use of cookies in the settings of your browser. With the use of cookies disabled you will not be included in the statistics.

For more information and the Privacy Statement of Google please see:  
[www.google.de/policies/privacy/](http://www.google.de/policies/privacy/)

## Use of Google Analytics

The [www.cbkhungary.com](http://www.cbkhungary.com) website uses the Google Analytics web analytic application provided by Google Inc. Google Analytics uses cookies that are sent and stored on the device used by the user, helping the site owner analyze the traffic of the website.

The information gained through the use of cookies are usually stored at one of the servers of Google, located in the USA. In the EU and EEA, in case IP anonymity is activated Google shortens the IP address of the user before storing the data.

The complete IP address of users will only be sent, stored and then shortened on the servers operated by Google in exceptional cases. Google will use the stored information to analyze the user activity and report directly back to the operator of the website. Google will provide further internet and web browsing analytic services to the customers based on the information recorded.

Google Analytics will not link the user's IP address to any other information stored at Google. The use of cookies can be disabled the settings of the browser. Please note that in case the use of cookies is disabled some services might partially or completely be inaccessible. The user can prevent Google from collecting a processing data related to the user's web usage (including IP address) by downloading and installing the browser plugin available at the following link:

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

## Data transfer

BoxByK Kft. will not transfer to any third party the data required for successful completion of service.

## Duration of data management

BoxByB Kft. will only keep and manage data until the data is required.

- **Principle:** Management of personal data provided by the user is maintained until user requests deletion of registration. The deletion of registration should take place in the following 10 (ten) business days from the deletion request.
- **Automatically recorded data:** Management of automatically recorded data is maintained until it is required to ensure the continuous operation of the system.
- **Data transferred to third party:** Management of data required for completion of delivery and/ or online payment is kept until fulfillment of service.
- **Cookies:** Management of data in relation of session cookies is maintained until browsing session ends.
- **Newsletter:** Management of data is maintained until user unsubscribes from newsletter.
- **Social media:** As management and keeping of data takes place on the specific social media site for information on source of data, management of data and transfer of data and legal rights, deletion, etc. please see the Privacy Statement or Terms and Conditions of the specific social media site.
- **Data related to purchase, finance and accounting:** Management of data related to purchase is maintained for 8 (eight) years in accordance with section 169 of Act C. of 2000, and in accordance with the period of limitation set forth in Act XCII. of 2003.

## Data security

BoxByK Kft. lays out and implements data management operations that it ensures the protection of personal data and information.

BoxByK Kft. takes care of data security issues by implementing the necessary security steps (password and anti-virus protection) and lays out the required procedural rules to operate in accordance of both the Information Act and other regulations related to data security and protection of confidentiality.

The service provider protects confidential data against:

- unauthorized access
- modification
- forwarding
- disclosing
- deleting or damaging
- accidental damage or destruction
- inaccessibility due to technical changes

BoxByK Kft. and the IT subcontractor will ensure through implementation of technical measures that the managed that will and could not be linked to the person of the user.

In order to prevent unauthorized access, modification, disclosure BoxByK Kft. will implement the following:

- Laying out and maintaining the necessary IT and technological environment
- Regulated enrollment and supervision of workforce
- Detailed and published operational, risk assessment and service plans

As described above, the service provider will ensure

- to be at all times available
- authenticity and authentication,
- verifiable unaltered state.

The BoxByK Kft. and its IT provider will ensure that the IT systems used are providing protection against

- scams,
- spyware,
- malware,
- spams,
- hacks
- other attacks.

## **Correction and modification of personal information**

User could request BoxByK Kft. to provide detailed information of the management and handling of personal data, request modification or correction of personal information, deletion or blocking of personal data – with exception to legally required data management.

User could request deletion or modification of personal data at any time at [info@cbkhungary.com](mailto:info@cbkhungary.com), or via any contacts listed in the Impressum or the Terms and Conditions.

## **Child Protection**

BoxByK Kft. does not wish to collect data related to visitors or users under the legal age of 18 (eighteen). If you are under 18 years of age please do not provide any personal information, consult with your parents and let them act in your stead.

## **Legal redress**

With any complaint related to management and protection of personal data please contact the National Authority for Data Protection and Freedom of Information (NAIH) or the competent jurisdiction via any of the contacts listed below:

▪ **National Authority for Data Protection and Freedom of Information**

- Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.
- Postal Address: 1530 Budapest, Postafiók: 5.
- Phone: +36 -1-391-1400
- Fax: +36-1-391-1410
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

**Modifications of Privacy Statement**

BoxByK Kft. reserves the right to change and modify the Privacy Statement at any time. The modified Privacy Statement shall be published and all users shall be notified via the [www.kultbox.hu](http://www.kultbox.hu) website.

Budapest, June 05 2022