

## DATA PROCESSING NOTICE

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### Webshop

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## DATA PROCESSING NOTICE

### Webshop Registration

**Effective date: 15/10/2025**

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (**Info Act**) (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**GDPR - General Data Protection Regulation**), we hereby inform you about the processing of the personal data you have provided:

#### 1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

#### 2. The data processed

##### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Surname, first name Email address Telephone number Address Public data contained in the Facebook profile when registering with a Facebook profile When registering with a Google account, the email address	Providing registration and user account creation, login, technical support for the shopping process, managing user database and recording previous purchases, order tracking Sending confirmation email, password reminders, confirmations Establishing and keeping contact	Consent of the data subject - Article 6(1)(a) GDPR	Until the user deletes the account - or withdraws their the consent, but for a maximum of 8+1 years from the last purchase.

##### Related legislation

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##### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

##### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

##### The source of the personal data processed:

The data subject

**The data will be transmitted:**

Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Dunaelektronika Kft. 1183 Budapest Gyömrői út 99. External system administrator, IT service provider, Magyar Telekom Nyrt. 1097 Budapest Könyves Kálmán krt. 34-36 Telecommunications service provider(s), Google Inc 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland Mail system, Google workspace, Google services, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Mailing system, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Website development, website support, operation, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Webshop operator, HRP Europe Kft. 1033 Budapest, Huszti út 34. ERP system operator, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Microsoft Dynamics NAV (formerly Navision) ERP system
<i>Recipients</i>	

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Google Inc,USA,Privacy Policy Data Privacy Framework, <a href="https://policies.google.com/privacy?hl=hu&amp;fg=2">https://policies.google.com/privacy?hl=hu&amp;fg=2</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> , <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage,

**Joint processing takes place:**

Answer	Name and registered seat of the joint controller
No	

**Access to data and data security measures:**

<b>Restricting access</b>	Only those employees have access to personal data who are in absolute need of this information to perform their work duties, typically the sales, finance, customer service, CRM admin and Call Center staff. The company ensures this through authorization management.
<b>Data security measure</b>	HTTP security protocol on the website Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Password protection of applications and software Two-factor authentication for logging into certain software

**3. Rights of the Data Subject:**

Rights of data subjects relating to the legal basis and an explanation of these rights
Right to information: The Data Subject has the right to be informed about the way in which personal data are processed before the processing starts Right of rectification: The Data Subject has the right to request the rectification of his or her personal data if the personal data held by the Controller are inaccurate and he or she can prove this Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her Right to erasure, right to be forgotten: The Data Subject has the right to obtain the permanent erasure of his or her data, unless the processing is based on the performance of a contract, the fulfilment of a legal obligation or the exercise of official authority

Withdrawal of consent: Where processing is based on consent, the Data Subject may withdraw his or her previously given consent at any time. Acceptance of a withdrawal request may also imply erasure of the data, but where there is another legal basis supporting the processing, the processing will cease only in relation to the specific purpose of the processing

Right to restriction: If the Data Subject does not consider the Controller to be entitled to process his or her personal data, he or she may request the suspension of the processing during the investigation

The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form

Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal effect on the Data Subject

#### 4. Exercise of data subject rights

Where the data subject has made a request to the controller in relation to the exercise of his or her rights as described in point 3, the controller shall respond without undue delay, but no later than one month from the receipt of the request, and inform the data subject of the action taken on the request. If necessary, this period may be extended by a further two months.

If the Controller fails to act on the data subject's request, 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 the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial redress.

#### 5. Lodging a complaint

The data subject has the right to lodge a complaint with the data protection authority:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Seat</b>	H-1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1363 Budapest, Pf.9.
<b>Email</b>	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	<a href="http://naih.hu">http://naih.hu</a>

#### 6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

## DATA PROCESSING NOTICE

### Webshop Purchase

**Effective date: 15/10/2025**

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (Info Act) (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR - General Data Protection Regulation), we hereby inform you about the processing of the personal data you have provided:

### 1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

### 2. The data processed

#### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Surname, first name Email address Telephone number Address Cart contents, ordered products Amount paid, payment method Other generated identifiers: customer number, order number, data provided in comments Other personal data provided during ordering: coupon code, etc.	Receiving, processing, fulfilling, and tracking orders Registering and redeeming loyalty points, redeeming coupon codes Sending confirmations and system messages Establishing and keeping contact	Necessary for the performance of a contract - GDPR Article 6(1) paragraph (b)	8+1 years from the last purchase.

#### Related legislation

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#### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

#### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

**The source of the personal data processed:**

The data subject
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**The data will be transmitted:**

Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Dunaelektronika Kft. 1183 Budapest Gyömrői út 99. External system administrator, IT service provider, Magyar Telekom Nyrt. 1097 Budapest Könyves Kálmán krt. 34-36 Telecommunications service provider(s), Google Inc 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland Mail system, Google workspace, Google services, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Mailing system, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Website development, website support, operation, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Webshop operator, HRP Europe Kft. 1033 Budapest, Huszti út 34. ERP system operator, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Microsoft Dynamics NAV (formerly Navision) ERP system
<i>Recipients</i>	

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Google Inc,USA,Privacy Policy Data Privacy Framework, <a href="https://policies.google.com/privacy?hl=hu&amp;fg=2">https://policies.google.com/privacy?hl=hu&amp;fg=2</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> ,  <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage,

**Joint processing takes place:**

Answer	Name and registered seat of the joint controller
No	

**Access to data and data security measures:**

<b>Restricting access</b>	Only those employees have access to personal data who are in absolute need of this information to perform their work duties, typically the sales, finance, customer service, CRM admin and Call Center staff. The company ensures this through authorization management.
<b>Data security measure</b>	HTTP security protocol on the website Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Password protection of applications and software Two-factor authentication for logging into certain software

**3. Rights of the Data Subject:**

Rights of data subjects relating to the legal basis and an explanation of these rights
Right to information: The Data Subject has the right to be informed about the way in which personal data are processed before the processing starts Right of rectification: The Data Subject has the right to request the rectification of his or her personal data if the personal data held by the Controller are inaccurate and he or she can prove this

Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her  
The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form  
Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal implication on the Data Subject.

#### 4. Exercise of data subject rights

Where the data subject has made a request to the controller in relation to the exercise of his or her rights as described in point 3, the controller shall respond without undue delay, but no later than one month from the receipt of the request, and inform the data subject of the action taken on the request. If necessary, this period may be extended by a further two months.

If the Controller fails to act on the data subject's request, 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 the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial redress.

#### 5. Lodging a complaint

The data subject has the right to lodge a complaint with the data protection authority:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Seat</b>	H-1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1363 Budapest, Pf.9.
<b>Email</b>	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	<a href="http://naih.hu">http://naih.hu</a>

#### 6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

## DATA PROCESSING NOTICE

### Webshop Package delivery

**Effective date: 15/10/2025**

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (Info Act) (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR - General Data Protection Regulation), we hereby inform you about the processing of the personal data you have provided:

#### 1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

#### 2. The data processed

##### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Name Delivery address Telephone number Email address Package ID number:	Home delivery of purchased products, order delivery Establishing and keeping contact	Necessary for the performance of a contract - GDPR Article 6(1) paragraph (b)	For 8+1 years pursuant to Section 169(1) of Act C of 2000 on Accounting.

##### Related legislation

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##### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

##### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

##### The source of the personal data processed:

The data subject
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**The data will be transmitted:**

Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Website development, website support, operation, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Webshop operator
<i>Recipients</i>	Magyar Posta Zrt. 1138 Budapest, Dunavirág utca 2-6. Postal services, package delivery GLS Hungary Kft. 2351 Alsónémedi, GLS Európa utca 2. courier service activity

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer

**Joint processing takes place:**

Answer	Name and registered seat of the joint controller
No	

**Access to data and data security measures:**

<b>Restricting access</b>	Only those employees have access to personal data who are in absolute need of this information to perform their work duties, typically the sales, finance, customer service, CRM admin and Call Center staff. The company ensures this through authorization management.
<b>Data security measure</b>	HTTP security protocol on the website Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Password protection of applications and software Two-factor authentication for logging into certain software

**3. Rights of the Data Subject:**

Rights of data subjects relating to the legal basis and an explanation of these rights
<p>Right to information: The Data Subject has the right to be informed about the way in which personal data are processed before the processing starts</p> <p>Right of rectification: The Data Subject has the right to request the rectification of his or her personal data if the personal data held by the Controller are inaccurate and he or she can prove this</p> <p>Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her</p> <p>The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form</p> <p>Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal implication on the Data Subject.</p>

**4. Exercise of data subject rights**

Where the data subject has made a request to the controller in relation to the exercise of his or her rights as described in point 3, the controller shall respond without undue delay, but no later than one month from the receipt of the request, and inform the data subject of the action taken on the request. If necessary, this period may be extended by a further two months.

If the Controller fails to act on the data subject's request, 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 the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial redress.

## 5. Lodging a complaint

The data subject has the right to lodge a complaint with the data protection authority:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Seat</b>	H-1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1363 Budapest, Pf.9.
<b>Email</b>	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	<a href="http://naih.hu">http://naih.hu</a>

## 6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

## DATA PROCESSING NOTICE

### Webshop Invoicing and Payment

**Effective date: 15/10/2025**

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (Info Act) (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR - General Data Protection Regulation), we hereby inform you about the processing of the personal data you have provided:

#### 1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

#### 2. The data processed

##### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Name Address Email address Bank account number - for transfers Bank card type, payment ID, last 4 digits of the bank card - in case of online payment, bank card payment	Processing of payments, issuing and sending financial documents	Necessary for the performance of a contract or fulfilment of a legal obligation - GDPR Article 6(1) paragraph (b) and (c)	For 8+1 years pursuant to Section 169(1) of Act C of 2000 on Accounting.

##### Related legislation

Act CXXVII of 2007 on Value Added Tax  
Act C of 2000 on Accounting

##### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

##### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

##### The source of the personal data processed:

The data subject

**The data will be transmitted:**

Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Kiss-Tóth Könyvelő Kft. 1149 Budapest, Nagy Lajos király útja 108. Accountant, MBH Bank Nyrt. 1056 Budapest, Váci utca 38., Bank(s), Raiffeisen Bank Zrt. 1133 Budapest, Váci út 116-118. financial institution(s), POS terminals Bizworks Kft. (Worldline business partner) 1024 Budapest, Margit krt. 15-17. Payment service provider - in the case of online payments, a web store, VPOS terminal provider, etc. Google Inc 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland Mail system, Google workspace, Google services, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Mailing system, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Website development, website support, operation, Total Studio Kft. 2096 Üröm, Asztalos utca 14/B. Webshop operator, AXEL Professional Softwares Kft. 6000 Kecskemét, Dobó I. krt. 13. III/11. Axel Pro invoicing software operator, HRP Europe Kft. 1033 Budapest, Huszti út 34. ERP system operator, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Microsoft Dynamics NAV (formerly Navision) ERP system
<i>Recipients</i>	Flex Audit Kft. 1223 Budapest, Kápolna utca 25/A I.em.4. Auditor - if applicable

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Google Inc,USA,Privacy Policy Data Privacy Framework, <a href="https://policies.google.com/privacy?hl=hu&amp;fg=2">https://policies.google.com/privacy?hl=hu&amp;fg=2</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> , <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage,

**Joint processing takes place:**

Answer	Name and registered seat of the joint controller
No	

**Access to data and data security measures:**

<b>Restricting access</b>	Only those employees have access to personal data who are in absolute need of this information to perform their work duties, typically the sales, finance, customer service, CRM admin and Call Center staff. The company ensures this through authorization management.
<b>Data security measure</b>	HTTP security protocol on the website Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Password protection of applications and software Two-factor authentication for logging into certain software

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The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form

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#### 5. Lodging a complaint

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<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Seat</b>	H-1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1363 Budapest, Pf.9.
<b>Email</b>	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	<a href="http://naih.hu">http://naih.hu</a>

#### 6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

## DATA PROCESSING NOTICE

### Webshop Warranty and Guarantee Claims

**Effective date: 15/10/2025**

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (**Info Act**) (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**GDPR - General Data Protection Regulation**), we hereby inform you about the processing of the personal data you have provided:

#### 1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

#### 2. The data processed

##### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Duration of data processing (storage)
Name Address Address Email address Telephone number Personal data related to the enforcement of legal claims - data related to purchases, orders, products and invoicing	Handling warranty and guarantee claims, recording claims, fulfilment of a legal obligation, handling complaints	Necessary for the performance of a contract or fulfilment of a legal obligation - GDPR Article 6(1) paragraph (b) and (c)	The Controller shall keep the records of the warranty or guarantee claim for three years from the date of recording.

##### Related legislation

Act V of 2013 on the Civil Code (Civil Code), Govt. Decree 151/2003. (IX. 22.) on the Mandatory Guarantee of Certain Durable Consumer Goods.  
Decree 19/2014. (IV. 29.) of the Minister for National Economy on the Procedural Rules of Guarantee and Warranty Claims for Goods Sold under Agreements between Consumers and Businesses.  
Decree 10/2024 (VI. 28.) of the Minister of Interior on the definition of durable consumer goods subject to mandatory warranty

##### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

##### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

**The source of the personal data processed:**

The data subject
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**The data will be transmitted:**

Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Magyar Telekom Nyrt. 1097 Budapest Könyves Kálmán krt. 34-36 Telecommunications service provider(s), Google Inc 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland Mail system, Google workspace, Google services, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Mailing system, MiniCRM Zrt. 1075 Budapest, Madách Imre út 13-14. MiniCRM - CRM system operator, HRP Europe Kft. 1033 Budapest, Huszti út 34. ERP system operator, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Microsoft Dynamics NAV (formerly Navision) ERP system
<i>Recipients</i>	

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Google Inc,USA,Privacy Policy Data Privacy Framework, <a href="https://policies.google.com/privacy?hl=hu&amp;fg=2">https://policies.google.com/privacy?hl=hu&amp;fg=2</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> ,  <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage,

**Joint processing takes place:**

Answer	Name and registered seat of the joint controller
No	

**Access to data and data security measures:**

<b>Restricting access</b>	Only those employees have access to personal data who are in absolute need of this information to perform their work duties, e.g. CRM admin staff, Call Center staff. The company ensures this through authorization management.
<b>Data security measure</b>	HTTP security protocol on the website Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Password protection of applications and software Two-factor authentication for logging into certain software

**3. Rights of the Data Subject:**

Rights of data subjects relating to the legal basis and an explanation of these rights
Right to information: The Data Subject has the right to be informed about the way in which personal data are processed before the processing starts Right of rectification: The Data Subject has the right to request the rectification of his or her personal data if the personal data held by the Controller are inaccurate and he or she can prove this Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form



Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal implication on the Data Subject.

#### 4. Exercise of data subject rights

Where the data subject has made a request to the controller in relation to the exercise of his or her rights as described in point 3, the controller shall respond without undue delay, but no later than one month from the receipt of the request, and inform the data subject of the action taken on the request. If necessary, this period may be extended by a further two months.

If the Controller fails to act on the data subject's request, 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 the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial redress.

#### 5. Lodging a complaint

The data subject has the right to lodge a complaint with the data protection authority:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Seat</b>	H-1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1363 Budapest, Pf.9.
<b>Email</b>	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	<a href="http://naih.hu">http://naih.hu</a>

#### 6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

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