

Privacy Policy

International School of Debrecen

Seat: 4002 Debrecen, Heltai Gáspár street 1.

registration number: 52484-2/2018/KÖZNEVIG

statistical reference number: 26939944-8510-931-09

VAT number: 26939944-2-09

represented by: Zoltán Érckövi, Business Manager

DATA MANAGEMENT INFORMATION

www.falconstore.isdebrecen.hu - in force from 01. June 2024.

Introduction

The **International School of Debrecen** (Seat: 4002 Debrecen, Heltai Gáspár street 1.; tax number: 26939944-2-09; statistical number: 26939944-8510-931-09) (hereinafter referred to as the Service Provider, Data Controller) always keeps the principles of data management in mind and is committed to data protection. The principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, limited storage, integrity and confidentiality, data protection by default and by design, and accountability are fully respected in the data management of the Controller.

REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "GDPR") (27 April 2016).), Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Infotv."), Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Commercial Advertising Activities and Act C of 2000 on Accounting.

This Privacy Policy governs the processing of data on the following website: <https://falconstore.isdebrecen.hu/>

The Privacy Policy is available at: https://falconstore.isdebrecen.hu/en/shop_help.php?tab=privacy_policy#

Amendments to this policy will enter into force upon publication at the above address.

The data controller and contact details

Name: International School of Debrecen

Seat: 4002 Debrecen, Heltai Gáspár street 1.

E-mail: falconstore@isdebrecen.hu

Phone: +36 20 530 85 20

Definitions

1. **"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, 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;
2. **"processing"** means any operation or set of operations which is performed upon 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;
3. **"controller"** means a natural or legal person, public authority, agency or any 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 the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;
4. **"processor"** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of a controller;
5. **"recipient"** means a natural or legal person, public authority, agency or any other body to whom or with which personal data are disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;
6. **"the data subject's consent"** means a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;
7. **"personal data breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed;
8. **"third party"** means a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Principles relating to the processing of personal data

Personal data must be processed lawfully and fairly and in a transparent manner for the data subject ("lawfulness, fairness and transparency").

Personal data must be collected for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes ("purpose limitation").

The purposes for which personal data are processed must be adequate, relevant and limited to what is necessary ("data minimisation").

Personal data must be accurate and, where necessary, kept up to date and all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay ("accuracy").

Personal data should be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data should be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR, subject to the implementation of appropriate technical and organisational measures as provided for in this Regulation to safeguard the rights and freedoms of data subjects ('limited storage').

Personal data should be processed in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ('integrity and confidentiality'), by implementing appropriate technical or organisational measures.

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability").

The controller declares that its processing will be carried out in accordance with the principles set out in this point.

Processing by the controller:

The fact of data collection, the scope of the data processed and the purpose of the processing:

Personal data	Purpose of data processing	Legal basis
User name	Identification, enabling registration.	Article 6 (1) (b) GDPR and Article 13/A (3) of Act CVIII of 2001 on Certain Aspects of Information Society Services (hereinafter: Elker Act).
Password	Used for secure access to the user account.	
Surname and first name	It is necessary for contacting you, making a purchase, issuing a proper invoice, exercising the right of withdrawal.	
E-mail address	To contact.	
Phone number	Keeping in touch, negotiating billing or delivery issues more efficiently.	
Billing name and address	The issuing of proper invoices and the creation, definition, modification and monitoring of the performance of the contract, the invoicing of the fees arising therefrom and the enforcement of claims relating thereto.	Article 6 (1) (c) GDPR and Article 169(2) of Act C of 2000 on Accounting
Delivery name and address	Enabling home delivery.	Article 6 (1) (b) of the GDPR and Section 13/A (3) of the Elker Act
The purchase/ registration date	Perform a technical operation.	
IP address at the time of purchase/registration	Perform a technical operation.	

Duration of processing, deadline for deletion of data: If one of the conditions of Article 17(1) GDPR is met, it shall last until the data subject's request for erasure. The erasure of any personal data provided by the data subject shall be notified by the controller to the data subject by electronic means pursuant to Article 19 of the GDPR. If the data subject's request for erasure also includes the e-mail address provided by him or her, the controller shall erase the e-mail address following the notification. Except in the case of accounting records, since pursuant to Article 169 (2) of Act C of 2000 on Accounting, these data must be kept for 8 years. The contractual data of the data subject may be deleted after the expiry of the civil law limitation period on the basis of a request for deletion by the data subject.

Persons to whom the data may be disclosed, recipients of personal data: personal data may be processed by the controller and by its authorised staff, in compliance with the above principles.

Description of the data subjects' rights in relation to data processing: the data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her and has the right to data portability and to withdraw consent at any time.

The data subject may request access to, erasure, rectification or restriction of the processing of personal data and portability of the data in the following ways:

- by post to the address at 1, Heltai Gáspár street, 4002 Debrecen, Hungary,
- by e-mail to the e-mail address falconstore@isdebrecen.hu,
- by telephone at +36 20 530 85 20

Please note that the data processing is necessary for the performance of the contract and the offer, the data subject is obliged to provide his/her personal data in order to fulfil his/her order. Failure to provide the data will result in our inability to process your order.

Management of cookies (cookie)

When downloading certain parts of the Website, ISD installs small data files (cookies), which may contain personal data, on the visitor's computer or other device for the purpose of data recording, identification of the visitor and facilitating his/her further visits. The visitor can set his or her browser to be notified when ISD wishes to place a cookie on his or her computer or other device, and can also opt out of receiving cookies at any time. However, if you do not accept cookies, some pages may not function properly or you may not be granted access to certain information.

In the case of users who access the Site for the sole purpose of visiting it, the data processing is carried out solely for the purpose of providing them with information, whereby the ISD records the starting and ending times of their visit and cookies, which are stored electronically by the ISD until the purpose of the processing is fulfilled, but for a maximum period of 2 years. The legal basis for the processing of visitors to the Website is the consent of the data subject.

The data subjects are all data subjects visiting the website.

Purpose of data processing: Identifying users, tracking visitors, ensuring tailored functionality.

Duration of processing, time limit for deletion of data:

Type of cookie	Legal basis for processing	Duration of data processing
Session cookies or other cookies that are essential for the functioning of the website	Article 6 (1) (f) of the GDPR. The legitimate interest of the controller for the purposes of operating the website, ensuring the functionality and essential functions of the website and the security of the computer system.	Period until the end of the relevant visitor session.
Permanent or saved cookies	Article 6 (1) (f) of the GDPR. The legitimate interest of the controller for the purposes of operating the website, ensuring the functionality and essential functions of the website and the security of the computer system	Data is processed until the data subject deletes it or cookies with a precise expiry date (permanent, saved) are stored on the computer until they are deleted, but at the latest until their expiry date.
Statistical, marketing cookies	Article 6 (1) (a) of the GDPR	1 month - 2 years

Most browsers used by our users allow you to set which cookies should be saved and allow (specific) cookies to be deleted again. If you restrict the saving of cookies on specific websites or do not allow third party cookies, this may in certain circumstances lead to our website no longer being fully usable. Here you will find information on how to customise your cookie settings for standard browsers:

Google Chrome

(<https://support.google.com/chrome/answer/95647?hl=hu>)

Internet Explorer

(<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>)

Firefox (<https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>)

Safari (<https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>)

ISD uses Google Analytics by Google Inc., Google Adwords. Google Inc. uses cookies and web beacons (web beacons) to collect information and to help analyse the use of the website. The information stored by the cookie (including the IP address of the data subject) is stored on servers of Google Inc. in the United States, Google Inc. may transfer the information collected to third parties where required to do so by law, or where such third parties process the information on behalf of Google Inc. In the context of Google Adwords remarketing, Google Inc. places visitor-tracking cookies on the devices of data subjects which monitor their online behaviour and on the basis of which Google Inc. makes advertising available to them on other websites based on user behaviour and interests. The tracking cookie also allows Google Inc. to identify the data subjects on other websites.

For more useful information about Google Inc.'s data-related activities and how to disable cookies and personalise your ads, please visit the Google Inc. website:

<http://www.google.com/intl/hu/policies/privacy/ads/>.

It is not possible to opt-out of the web beacon.

If the ISD becomes aware that a visitor has provided personal data of a third party or otherwise in violation of the law, the ISD may use publicly available or unlawfully obtained personal data or data not constituting personal data that is publicly available or has been obtained in violation of the personal rights of third parties or in violation of the law (e.g. spam) or has otherwise violated this Privacy Policy or caused damage while using the Website, ISD will take the necessary legal measures to compensate the damage caused and to hold the person who has engaged in the above mentioned conduct liable by legal action.

Newsletter, DM activity

We will only send newsletters with your prior consent (newsletter registration). The legal basis for data processing pursuant to Article 6(1)(a) GDPR is therefore your consent, which you give by subscribing. Your information is provided in relation to current information, news concerning us and the sending of informative articles and materials. In addition, the Customer may, subject to the provisions of this notice, consent to the processing of personal data by the Service Provider for the purpose of sending promotional offers.

The fact of data collection, the scope of data processed and the purpose of data processing:

Personal data	Purpose of data processing	Legal basis
Név, e-mail cím / Name, e-mail address	Azonosítás, a hírlevélre való feliratkozás lehetővé tétele. / Identification, enabling subscription to the newsletter.	Consent of the data subject, Article 6 (1) (a) GDPR. Article 6 (5) of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Commercial Advertising.
Date of subscription	Perform a technical operation.	

IP address at the time of subscription	Perform a technical operation.	
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Data subjects: all data subjects subscribing to the newsletter.

All subscribers who have subscribed to our newsletter. You can unsubscribe by clicking on the unsubscribe link in the newsletter or by sending an unsubscribe e-mail to falconstore@isdebrecen.hu or by post to the above address. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal. You can, of course, re-subscribe at any time should you change your mind.

Duration of processing, deadline for deletion of data: processing until the consent is withdrawn, i.e. until unsubscription.

Complaint handling

The fact of data collection, the scope of data processed and the **purpose of data processing:**

Personal data	Purpose of data processing	Legal basis
Surname and first name	Identification, contacting.	Article 6 (1) (c) and Article 17/A (7) of Act CLV of 1997 on Consumer Protection.
E-mail address	Keeping in touch.	
Phone number	Keeping in touch.	
Billing name and address	Identifying, handling quality complaints, questions and problems with the products/services ordered.	

Data subjects: all data subjects who have made a purchase on the website and who have made a complaint about quality.

Duration of data processing, deadline for deletion of data: copies of the record, transcript and reply to the complaint shall be kept for 3 years pursuant to Article 17/A (7) of Act CLV of 1997 on Consumer Protection.

The identity of the potential data controllers entitled to access the data, the recipients of the personal data: The data may be processed by the data controller and by its authorised staff, subject to compliance with the above principles.

The data subject may request access to, erasure, modification, restriction of processing or portability of personal data by the following means:

- by post at the address at Heltai Gáspár street 1, 4002 Debrecen, Hungary,
- by e-mail to the e-mail address falconstore@isdebrecen.hu,
- by telephone at +36 20 530 85 20.

Please note that the provision of personal data is based on a legal obligation. The processing of personal data is a prerequisite for the conclusion of the contract. You are obliged to provide personal data in order to allow us to handle your complaint. Failure to provide this information will result in our inability to deal with your complaint.

Recipients to whom personal data are disclosed:

Processors (those who carry out processing on behalf of the controller)

The controller uses processors to facilitate its own processing activities and to fulfil its contractual and legal obligations with data subjects.

The controller shall place great emphasis on using only processors that offer adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the requirements of the GDPR and to protect the rights of data subjects.

Data processors:

Data processing activities	Name, address, contact details
Hosting service	UNAS Online Kft., 9400 Sopron, Kőszegi út 14., Tax number: 14114113-2-08 EU, Tax number: HU14114113

Data transfer to third parties

Third party data controllers process the personal information we provide on their own behalf and in accordance with their own privacy policies.

Activity of the Data Controller	Name, address, contact details
Online payment	OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság Székhely: 1138 Budapest, Váci út 135-139. B. ép. 5. em. Cg.: 01-09-174466 Adószám: 24386106-2-44

Data subjects' rights in relation to data processing

1. Right of access

You have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is ongoing, the right to access your personal data and the information listed in the Regulation.

2. Right to rectification

You have the right to have inaccurate personal data relating to you corrected by the controller without undue delay upon your request. Taking into account the purposes of the processing, you have the right to request the rectification of incomplete personal data, including by means of a supplementary declaration.

3. Right to erasure

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and the controller is obliged to erase personal data concerning you without undue delay, subject to certain conditions.

4. Right to be forgotten

If the controller has disclosed the personal data and is under an obligation to erase it, the controller will take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that have processed the data that you have requested them to erase the links to or copies or replicas of the personal data in question.

5. Right to restriction of processing

You have the right to obtain, at your request, the restriction of processing by the controller if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction shall apply for a period of time which allows the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;
- you have objected to the processing; in this case, the restriction applies for a period of time until it is established whether the controller's legitimate grounds override your legitimate grounds.

6. Right to data portability

You have the right to receive the personal data concerning you that you have provided to a controller in a structured, commonly used, machine-readable format and the right to transmit these data to another controller without hindrance from the controller to whom you have provided the personal data.

7. Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data, including profiling based on the aforementioned provisions. In such a case, the controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data may no longer be processed for those purposes.

8. Automated decision-making in individual cases, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

This provision does not apply where the decision:

- It is necessary for the conclusion or performance of a contract between you and the controller;
- it is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

Procedural rules

The controller shall inform you of the action taken on your request pursuant to Articles 15 to 22 GDPR without undue delay and in any event within 1 month of receipt of the request.

If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by 2 months. The controller will inform you of the extension of the time limit within 1 month of receipt of the request, stating the reasons for the delay.

If the controller fails to act on your request, it shall inform you without delay and at the latest within one month of receipt of the request of the reasons for its failure to act and of the possibility to lodge a complaint with a supervisory authority and exercise your right to judicial remedy.

Possibility to lodge a complaint

The data subject may address a request to the controller in order to exercise the rights granted to him or her. If the data subject considers that the controller has not complied with the provisions of the GDPR and other applicable laws in the processing of his or her personal data, he or she may initiate an investigation with the National Data Protection and Information Authority:

National Data Protection and Information Authority;

registered office: 1055 Budapest, Falk Miksa street 9-11.; postal address: 1363 Budapest, Pf. 9.; telephone number: +36-1-391-1400; fax number: +36-1-391-1410; e-mail address: ugyfelszolgalat@naih.hu

Closing words

The legislation governing the preparation of this information notice:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation) (GDPR);
- Act CXII of 2011 - on the Right to Informational Self-Determination and Freedom of Information;
- Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services (in particular Article 13/A);
- Act XLVII of 2008 - on the Prohibition of Unfair Commercial Practices against Consumers;
- Act XLVIII of 2008 - on the basic conditions and certain restrictions on commercial advertising (in particular § 6);
- Act XC of 2005 on Freedom of Electronic Information;
- Act C of 2003 on electronic communications (specifically § 155);
- Opinion No 16/2011 on the EASA/IAB Recommendation on best practice in behavioural online advertising;
- - Recommendation of the National Authority for Data Protection and Freedom of Information on data protection requirements for prior information.

This document is available in English and Hungarian.

Dated: Debrecen, 01. June 2024.