

# Privacy Policy

## Privacy Statement

### General Information

Below are the data processing steps of the website **vivawell.hu**, operated by **Varga Vivien E.V.**

#### Contact:

Full legal name: **Varga Vivien sole proprietor**

Tax number: **55549763-2-33**

Postal address: **2100 Gödöllő, Mandula utca 8.**

E-mail: **info@vivawell.hu**

### What personal data we process and why

On the vivawell.hu website, we process the following categories of personal data in order to accurately identify an individual, with the exact legal basis specified for each:

#### COMMUNICATION DATA

This includes any message you send to us via the website, by e-mail, social media message, or any other form of communication.

We process and retain these data so that we can fulfil orders and provide a basis for decision-making in the event of potential legal claims.

**Legal basis:** the user's demonstrable interest in our activities, as evidenced by messages addressed to us (legitimate interest).

#### CUSTOMER DATA

This includes all information related to the purchase of products and services, such as the customer's name, shipping and billing address, e-mail address, phone number, and details of purchased products.

We process these data to successfully fulfil orders and to maintain legally compliant records of purchases.

**Legal basis:** performance of the contract concluded by placing the order between the customer and Vivawell.

#### USER DATA

This includes data generated during the use of the website that enable the technical operation of the site, help us maintain site security, store backups of user activity, and ensure access to the most relevant content.

**Legal basis:** the user's clear interest in our activities, for which storing such data is necessary to ensure the site's technical operation (legitimate interest).

#### TECHNICAL DATA

This includes data generated during the use of the site such as IP address, login information, browser data, time spent on individual pages, page views and navigation paths, number and time of visits, time zones, and device data used to view the site.

The source of these data is our website analytics software.

We process these data to analyse user behaviour on the site, maintain secure operation, and assess the effectiveness of our marketing decisions.

**Legal basis:** the user's clear interest in our activities, which allows us to process these data in line with security expectations and use them to grow the business through more effective operation (legitimate interest).

#### MARKETING DATA

This includes visitor preferences regarding what marketing content they are willing to receive from us. We process these data to enable participation in prize draws and to send advertising related to those of our products/services towards which the user has expressed interest.

**Legal basis:** the user's clear interest in our activities, allowing us to process these data in compliance with security expectations and use them to grow the business through more effective operation (legitimate interest).

From time to time, we may use the collected data to provide targeted, relevant advertisements on the **Facebook™** and/or **Instagram™** platforms and on various dynamic advertising surfaces, and to measure the effectiveness of such ads.

**Sensitive data:** We do **not** collect special categories of data such as ethnicity, religious views, sexual life and orientation, political opinions and trade union membership, health background, or genetic or biometric information.

### How we collect data

We may collect personal data in ways such as the user providing them directly to us (for example, by placing an order or sending a message).

In addition, certain data are collected automatically during use of the site, for example through so-called "cookies" and similar technologies. These only become active after the user has given consent.

Data collected by cookies may include (but are not limited to): IP address, demographic information, browser type, pages viewed, actions taken, and the timing of the visit. In your browser settings, you may disable certain tracking mechanisms at any time. However, disabling such functions may prevent the use of certain services or the full exploitation of all features offered on the webshop.

We use different types of cookies on the webshop for different purposes. These types are **strictly necessary cookies, performance cookies, and functional cookies**. Some cookies may be provided by external third parties to offer additional features on the webshop; these are listed below.

#### Strictly necessary cookies:

These cookies are essential to perform an action requested by you—such as identifying you as a logged-in user. If you disable these cookies via your browser settings, we cannot guarantee the webshop's performance during your visit.

#### Performance cookies

We use these cookies to improve the webshop, e.g., to create analytics that show how it is used and what needs improvement. These cookies collect information on how visitors use the webshop. The information is collected anonymously and includes the number of visitors, where visitors arrived from, and which pages they visited.

#### Functional cookies

These cookies improve the webshop's performance and functions, often based on your activities as a user. For example, we can customise content for you or remember your preferences.

### **Data from external partners**

We receive certain data from external partners such as analytics providers (e.g., Google—non-EU partner), advertising networks (e.g., Facebook™ or Instagram™—non-EU partners), and partners providing shipping support or payment solutions.

### **Practical steps regarding data protection**

Protecting users' data and complying with applicable regulations is of utmost importance to Vivawell. Therefore, after performing a data protection impact assessment on the site, we compile a list of the data collected, their necessity and legal basis, and their statutory compliance.

From time to time, it may be necessary for business operations to provide data to our service partners (e.g., hosting provider, courier company, newsletter software).

In such cases, we always select partners who comply with the **EU-US Data Privacy Framework** or apply the **Standard Contractual Clauses (SCC)** adopted by the European Commission.

## **5. Marketing communication**

Marketing communication is essential to our business activities. The legal basis for such processing is either the demonstration of interest in our products or the user's explicit consent.

Under the **Privacy and Electronic Communications Regulations (PECR)** of the European Union, we may send marketing messages to users if they have previously purchased from our webshop or have explicitly consented to receiving marketing messages.

We always make it clearly possible to suspend consent and unsubscribe from messages. Each e-mail contains the link required for unsubscribing, or removal from the database may be requested at [zkrizsanyik@gmail.com](mailto:zkrizsanyik@gmail.com).

Even after unsubscribing from marketing communications, we may send messages, but only regarding order fulfilment or direct inquiries.

## **6. Note regarding personal data**

At times, it is necessary to share certain personal data with certain partners in order to maintain normal business operations:

- IT service providers and providers performing troubleshooting and maintenance on IT systems
- Professional partners such as lawyers, accountants, bankers, insurers
- Government bodies requesting reports on our activities
- Payment service providers handling card data securely
- Courier services fulfilling incoming orders to the specified shipping address

### **International data transfers**

From time to time, to maintain business operations, we need to share users' data with partners located outside the **European Economic Area (EEA)**.

Countries outside the EEA often do not provide the same level of data protection; therefore, European laws prohibit exporting data without appropriate conditions being met.

Whenever personal data are transferred outside the EEA, in addition to the steps discussed in Section 4, we take the following measures to ensure secure processing:

- We only transfer data to countries that the **European Commission** considers adequate in terms of data protection.
- We only use US-based services that comply with the **EU-US Data Privacy Framework** or apply **Standard Contractual Clauses (SCC)**.

If the above are not met, we request the user's **explicit consent** to perform the data transfer. Consent may be withdrawn at any time.

### **Links to external sites**

This site may occasionally contain links to external websites or embedded code snippets that enable the operation of external services.

Clicking these links or using embedded solutions may allow external partners to collect data about users.

While we make every effort to properly review partners, we do not control their privacy policies and are not responsible for their data processing practices.

## **7. Data retention period**

We store users' data only for as long as required by legal/accounting/reporting obligations or as necessary to operate the service.

When determining retention periods, we consider the amount, nature, and sensitivity of the data and the potential impact of any leakage in the event of a data protection incident.

For tax reasons, we must retain customers' invoicing and purchase data for at least **8 years** to comply with legal obligations.

In certain circumstances, we may use data in anonymised form for statistical purposes, in which case we store the data for an unlimited period without notification.

## **8. Visitor rights**

As a citizen of the European Union, the **General Data Protection Regulation (GDPR)** grants the following rights to users of the site:

### **a) Right of access to personal data**

Users have the right to request a copy of the personal data stored by Vivawell. As a general rule, requests are fulfilled free of charge within **1 month** of application.

In the case of repeated, abusive, or unfounded requests, Vivawell may charge a reasonable fee for providing the data, and additional time may be needed.

Furthermore, Vivawell will request proof of identity before releasing data to prevent abusive use. Requests for personal data should be sent to [info@vivawell.hu](mailto:info@vivawell.hu).

[INSERT CONTACT FORM]

#### **b) Right to rectification**

If personal data have changed or were provided incorrectly, users have the right to request correction. To modify personal data, please contact [info@vivawell.hu](mailto:info@vivawell.hu).

#### **c) Right to erasure (right to be forgotten)**

Users have the right to request the deletion of all their personal data. We fulfil the request free of charge within **1 month** of receipt, as required by the GDPR.

After deletion, the user account will no longer be available; any purchased materials will also become inaccessible, as personal data linked to the user account are essential to access the service.

Vivawell requests proof of identity before deleting personal data to prevent abusive use. Requests for deletion should also be sent to [info@vivawell.hu](mailto:info@vivawell.hu).

#### **d) Right to restrict processing**

Users have the right to request that the availability of their data to third parties (service partners) be restricted. The partners to be restricted may be named when submitting the request. To restrict the transfer of personal data, please send your request to [info@vivawell.hu](mailto:info@vivawell.hu).

Please note that cooperation with certain service providers is indispensable for the operation of the site (e.g., payment service provider). If they are restricted, the site's services will become unavailable to the user.

Vivawell requests proof of identity before restricting the transfer of personal data to prevent abusive use. **To restrict the transfer of personal data, please use the contact form above.**

In Hungary, the official authority dealing with data protection is the **National Authority for Data Protection and Freedom of Information (NAIH)**. Users can find more information about their data protection rights on the NAIH website.

#### **e) Right to data portability**

Users have the right to receive the personal data concerning them, which they have provided to the controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (**GDPR Article 20**). Vivawell fulfils data portability requests no later than **1 month** from receipt.

#### **National Authority for Data Protection and Freedom of Information (NAIH)**

Address: **1125 Budapest, Szilágyi Erzsébet fasor 22/C**

Mailing address: **1530 Budapest, Pf.: 5.**

Phone: **+36 1 391 1400**

Fax: **+36 1 391 1410**

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <http://www.naih.hu>