

PRIVACY NOTICE
WWW.LAVYLITES.COM
FOR WEBSHOP CUSTOMERS AND FOR THOSE REGISTERING VIA THE WEBSITE

1. INTRODUCTION

This privacy notice (hereinafter referred to as: **Privacy Notice**) provides information on data processing of personal data of natural persons and their rights related to the processing of personal data and legal remedies carried out by **Lavylites Worldwide Zrt.** (H-1053 Budapest, Veres Pálné u. 9.) hereinafter: **Data Controller** who place an order on the cosmetic products created and maintained by the Data Controller (hereinafter: **Products**) sold via the website www.lavylites.com (hereinafter: **Website**) and via the webshop operating on the Website (hereinafter: **Webshop**), or who wish to enter the marketing and sales network (hereinafter: **Lavylites Network Marketing**) operated based on separate policies (hereinafter: **Lavylites Policies**) by Lavylites World Ltd. (1a Falmer Court, London Road, Uckfield, England, company registration number: 12008782, hereinafter: **Data Controller 2**) on the Website or are already the members of the network and register on the Website (hereinafter: **Data Subject**).

The Data Controller processes the Personal Data of the Data Subject in accordance with this Privacy Policy in the course of orders placed by the Data Subject for Products and registration on the Website to access Lavylites Network Marketing and the exercise of membership rights via the Website.

2. NAME AND CONTACT DETAILS OF THE DATA CONTROLLER

name: **Lavylites Worldwide Zrt.**
 registered seat: H-1053 Budapest, Veres Pálné utca 9. fszt. 6.

Data controller's data protection officer (contact person), contact details:
 Executive Manager, postal address: H-1053 Budapest, Veres Pálné utca 9. fszt. 6., email: lavylites@lavylites.com

3. FUNDAMENTAL LAWS, REGULATIONS AND BASIC CONCEPTS UNDERLYING THE DATA PROCESSING

- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: **Infotv**);
- Regulation (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 (hereinafter: **GDPR**);
- Act V of 2013 on the Civil Code (hereinafter: **Ptk**);
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (hereinafter: **Ekertv**);
- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: **Pmt**);
- Act CLV of 1997 on Consumer Protection (hereinafter: **Fttv**);
- Act C of 2000 on Accounting (hereinafter: **Accounting Act**);
- Act CL of 2017 on the Rules of Taxation (hereinafter: **Art**);
- The Data Controller's current Data Management and Privacy Policy (hereinafter: **Policy**), which is available on the Controller's website. For a detailed description of the basic concepts used in relation to the processing and protection of personal data, please refer to the relevant chapter of the Code.

4. PURPOSE OF DATA PROCESSING

The Data Controller, during the operation and maintenance of the Webshop and the Website may process the personal data necessary and sufficient to identify those placing an order on the Webshop: (i) natural persons or (ii) the directors, natural person owners and beneficial owners or other natural persons acting on their behalf (collectively: Data Subjects), other customers who wish to contact the Data Controller or to establish legal relationship with the Data Controller or already having established a legal relationship with the Data Controller for the purpose of **establishing legal relationships, contracts, defining their content, amending them, monitoring their performance, recording payments** resulting from them and **enforcing claims** in relation to them with natural persons, legal entities and organisations without legal personality who place orders and wish to become or already became members of Lavylites Network Marketing, and **for the purposes of responding to and processing comments, questions and complaints.**

5. LEGAL BASIS FOR PROCESSING

The legal basis for the processing of data in relation to the supply of Products based on the agreement between the Data Controller and the Data Subject is the performance of an agreement between the Data Subject and the Data Controller is **Article 6(1)(b) of GDPR**; i.e. processing is necessary for the preparation or performance of a contract to which the Data Subject is a party to, at the request of the Data Subject, and **Article 6(1)(f) of GDPR** in relation to the enforcement of claims arising from the agreement; i.e. processing is necessary for the purposes of the legitimate interests pursued by the Controller.
 Furthermore, the legal basis for the processing of certain personal data of the Data Subject which are required by law or which must be provided is **Article 6(1)(c) GDPR**; that is, the processing is necessary for compliance with a legal obligation to which the Controller is subject. The legal basis for the processing of data other than personal data is **Article 6(1)(a) of the GDPR**; i.e. the Data Subject's consent.

6. SCOPE OF THE DATA PROCESSED AND THE SPECIFIC PURPOSES OF THE PROCESSING

Personal data processed and categories	Purpose of data processing	Legal basis for processing	Duration of processing (deadlines for erasure)	Name and contact details of the joint controller, its representative and data protection officer (if any). In the case of controllers, the specific representative and joint data protection officer designated in the Policy shall be considered to be such in all cases.
Name and email address of the natural person.	Posting comments on the website, sending them to contact email addresses, answering questions, maintaining contact. Informing data subjects in newsletters about products, promotions, news about Lavylites	Article 6(1)(a) of GDPR	Until the withdrawal of consent, 30 (thirty) days after the question is answered (whichever is sooner).	The Data Controller shall forward to the Data Controller-2 any comments and questions regarding Lavylites Network Marketing received on the Website and Weboffice operated by the Data Controller-2, as well as answer any technical and IT-related questions regarding the Website or Weboffice.
Name, address, email address and telephone number of the natural person. Billing name, address and delivery name, address (if different from the name and address of the customer)	Completion of purchases in the Webshop, issuing and retaining receipts in accordance with the Accounting Act, maintaining contacts	Article 6(1)(b) of GDPR Ekertv Section 13/A(1)-(3)	The general limitation period after termination of the contract is 5 (five) years (Civil Code. Section 6:22(1)). Pursuant to the Accounting Act, the data processed for the purpose of issuing and storing the receipt shall be processed for a period of 8 (eight) years after the termination of the contract (Section 169(2) of the Accounting Act). Management and retention of accounting documents until the right to tax assessment has expired, i.e. for 5 (five) years from the end of the year in which the tax return based on	Data Controller in the course and for the purpose of maintaining and operating the Weboffice operated by it, Data Controller-2 for the purpose of recording and accounting for the orders placed in the Webshop within Lavylites Network Marketing.

			the document was filed (Sections 47(1) a 164(1) of Art.	
Personal data provided to the Data Controller in the context of a complaint lodged in relation to its activities, at least the following data of the person lodging the complaint - name, - address; - email address in case of an electronic complaint Documents kept: - the record of the complaint; - answer given	Handling of complaints about services provided by the Data Controller	Article 6(1)(c) GDPR	Copies of the record of the complaint and the reply to the complaint shall be kept for 5 (five) years pursuant to Section 17/A (7) of the Fttv.	
Name and address of the natural person buyer.	Enforcement of the claims of the Data Controller arising from the above legal relationships (management of receivables, collection, enforcement of other claims).	Article 6(1)(f) of GDPR	The termination of the contract/legal transaction or, if a claim has been asserted by or against the Data Controller in relation to the Data Subject, the expiry of the general limitation period of 5 (five) years (Civil Code. 6:22 (1)).	
Personal data (name, address, telephone number, email address of the Data Subject) provided to the Data Controller in the course of customer notifications, messages and requests concerning individual customer needs sent to the Data Controller in connection with its activities	Handling notifications, answering messages, meeting individual customer needs	Article 6(1)(a) of GDPR	To be deleted within 30 (thirty) days after the processing of notifications, messages or until the withdrawal of consent to data processing (whichever occurs first).	none

The methods of physical recording of data can be: paper document, electronic data.
Entitled to access the data at the Data Controller are: managers, customer service, logistics, distribution and financial staff.
The data is stored at the Data Controller's head office and on its own servers.

7. DATA PROCESSING, DATA TRANSMISSION

The Data Controller informs the Data Subjects that those persons may access and process the data for whom it is indispensable to carry out their duties.

Within the organisation of the Data Controller, the personal data of the Data Subjects shall only be transmitted in accordance with *the purpose limitation principle* and access to such data may be granted only for the appropriate purpose. The transfer of data between the Data Controller's headquarters and individual departments is necessary to ensure the most efficient performance of public tasks and to ensure the legal, financial and technical conditions for the performance of the tasks, but in each case in accordance with the purpose limitation principle.

In addition to the above, the Data Controller shall only transfer the Data Subject's data to third parties with the prior written consent of the Data Subject or in the case of compliance with a legal obligation.

The Data Controller records, pursuant to Article 13(1)(f) of GDPR, that at the time of this notice it *does not transmit* any processed data to third countries or international organisations.

The names and contact details of any potential data processors of the Data Controller are set in the currently valid Policy.

8. RIGHTS OF THE DATA SUBJECT

In connection with their personal data, Data Subjects may request information about the processing of their personal data; access to their personal data; the rectification of their personal data; the erasure of personal data by an email request sent to the Data Controller; and the restriction of processing. The Data Controller shall notify the Data Subject of its decision in this regard within 30 (thirty) days of receipt of the request.

Right of access

The Data Subject shall have the right to obtain from the Controller, upon request, information as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to access the processed personal data.

Right to rectification

The data subject has the right to request the rectification or completion of the data processed.

Right to erasure (the "right to be forgotten")

The Data Subject has the right to request the erasure of the data processed. A request for erasure will be refused if there is a legal obligation to store the data.

Right to restriction

The Data Subject has the right to request the restriction of the processing (by clearly indicating the limited nature of the processing and ensuring that it is kept separate from other data). The restriction will last as long as the reason indicated by the Data Subject makes it necessary.

Right to object

The Data Subject has the right to object, and is therefore entitled to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data in the public interest or in connection with the performance of a task carried out in the exercise of official authority vested in the controller, or in relation to the processing of personal data by the controller or in the legitimate interests of a third party.

Right to withdraw consent

If the processing is based on the Data Subject's consent, the data subject may withdraw his or her consent to the processing at any time by sending a written statement to the Data Controller, without affecting the lawfulness of the processing carried out on the basis of the consent prior to the withdrawal and of the processing carried out on other legal grounds.

Complaints and redress

The Data Subject has the right to lodge a complaint with a supervisory authority or to initiate judicial remedies if he or she considers that there has been a breach of his or her rights in relation to the processing of his or her data or the exercise of his or her rights in connection with the processing.

Contact details of the supervisory authority:
National Authority for Data Protection and Freedom of Information
address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c.
email address: ugyfelszolgalat@naih.hu

In the event of a judicial remedy, the court of the place where the Controller is established shall have jurisdiction, but the action may also be brought, at the choice of the Data Subject, before the court of the place of residence or domicile of the Data Subject.

While respecting the above rights, we ask Data Subjects to contact us before lodging a complaint with a supervisory authority or a court in order to discuss and resolve the problem as quickly as possible.
