

Privacy policy

Based on the 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 the Act CXII of 2011 on information self-determination and freedom of information (further: the act on information)

Name of the data controller: Complexpress Logisztika Kft.

Represented by: Rácz Péter

Registered office: 1033 Budapest, Szentendrei út 89-95.

Mailing address: 1033 Budapest, Szentendrei út 89-95.

E-mail: info@complexpress.hu

Phone (not fixed-line): 30-694-24-65

WEB page: www.complexpress.hu (not accessible for blind and visually impaired)

The Company does not employ any data protection officer

The Company processes personal data as described in the section of **Data subjects, purpose and timing of data processing**

Profiling: the Company does not perform any data processing with profiling

The Company uses cookies on its webpage.

During the visit on the Webpage, one or more cookies – a small file containing a series of characters – are sent to the computer of the visitor, with the help of which his browser can be identified. These cookies are secured by Google, these are used through the Google's AdWords system. These cookies are sent to the visitor's computer solely in case of visiting of certain subpages, so apart from the fact and timing of the visits to such subpages, no other information are stored in them.

The use of cookies sent by this way is the following: the external service providers - amongst them the Google - store the data if the user has visited the advertiser's webpage with the help of such cookies, and based on that they display advertisements on the websites of the external service provider's - amongst them the Google - partners to the user. User can block Google's cookies on a site serving as switcher of Google's advertisement. (It also can indicate to the user that they can block the cookies of external service providers on the unsubscribe page of the Network Advertising Initiative.)

Cookies applied:

- Analytics, follow-up cookie
- Follow-up through the webpage
- Login, user identification session cookie

The "Help" function of most of the browsers provides information about the possibilities provided by the given browser in relation to

- how to block the cookies;
- how to accept new cookies; or
- how to instruct the browser to set up new cookies; or
- how to block other cookies.

The Company does not collect any personal data on its webpage.

I. Legal basis of data processing

In case of contracting, the data processing is required to fulfil the contractual obligations and based on legal regulations. Data provision is voluntary, the data subject is not obliged to consent to the data processing, and he takes note that in absence of such data, the Company is not in the position to start or continue a business relationship with him.

In other cases the provision of data is voluntary, the withdrawal of a consent to the data processing does not affect the legality of the former data processing.

II. Data subjects, purpose and timing of data processing

Data processing effects the data of all customers, principals, agents and visitors (data subjects).

The Company processes personal data with the sole purpose to be able to provide the services and payments to the data subjects as described in the assignment agreement (purpose limitation of data processing).

Principles and way of data processing

1. The Company collects data in a good faith, and in a fairly and transparent manner, in cooperation with data subjects. The Company processes only the data prescribed by the law or provided by the data subjects, for the purposes as described below. The nature of processed personal data is in line with the purpose of the data procession, it cannot extend beyond that purpose.
2. In all cases when the Company intends to use the personal data for other than the original purpose of the data collection, it informs the data subject and obtains his prior written expressed consent; and provides the option for the data subject to block such use of personal data.
3. The Company does not verify the personal data it was provided with. The validity of personal data provided is the responsibility of the person providing it.
4. Personal data of a person under the age of 16 years can only be processed with the consent of an adult person exercising the parental control. The Company is not in the position to verify the eligibility of the consenting person or the content of his statement, therefore the legal compliance of such statement is the liability of the data subject and the person exercising the parental control over him. In the absence of a consent the Company continues to process the personal data of persons under the age of 16 years on bases granted by the law, and if the data processing is of public interest, or it is necessary in the course of the execution of a task stipulated by licence assigned by a public authority, or the Company has a legitimate interest to do so.
5. The Company does not provide the personal data processed to any third party, except for the processors as defined in this Policy, and in certain – defined in this Policy – cases to external service providers.

The use of data in a statistically aggregated form is an exemption from this section, in such case the aggregated data can not contain any data in any form which could identify the data subject, therefore it is not considered as data processing nor transmission.

The Company in certain cases – official inquiries from courts or the police, harm of the interest of the Company due to legal proceedings because of infringements in relation with intellectual property-, property or other rights, or serious suspect thereof; or threats to the provision of service – makes available to third parties the available personal data of the data subject.

The Company notifies the data subject and all those parties to whom the personal data have formerly been transmitted for data processing about the amendment, restriction or erasure of the personal data processed by the Company. This notification can be left out in case this does not harm the legal interest of the data subject with regard to the purpose of the data processing.

The Company processes personal data solely for determined purposes, to exercise right or fulfil obligation. Data processing is in line with the purpose of the data processing, in all phase of such process. The registration and processing of data is made on a fairly and legally compliant manner. The Company pursue to process only such personal data that are necessary and adequate to reach the goal of the data processing. Personal data can only be processed to the extent and timing necessary for the realisation of the goal.

The Company processes the following data:

Type of data	Purpose and reason of data processing	Duration of data processing
First name and name, address , e-mail address and phone number of the private person as principal / agent	Conclusion of a contract, contacting	8 years (accounting archiving) following the termination in case of a frame agreement, or performance in case of an ad-hoc order
Name, e-mail address and phone number of the private person representing a company	Conclusion of a contract, contacting	3 months following the termination in case of a frame agreement, or performance in case of an ad-hoc order, or the cessation of the representation
name and registered office of the private entrepreneur, number of the private entrepreneur’s ID card, bank account number, e-mail address, phone number	Conclusion of a contract, contacting	8 years (accounting archiving) following the termination in case of a frame agreement, or performance in case of an ad-hoc order

Type of data	Purpose and reason of data processing	Duration of data processing
device monitoring the public area – security camera	based on voluntary consent and the legal interest of the company, personal and property protection	30 days
personal data processed in the course of awarding the Webshop of the Year award: name, phone number and e-mail address of the private persons representing the applying companies	based on voluntary consent, contacting	the period of application and 3 month following its closure
personal data processed in the course of awarding the Webshop of the Year award: name, phone number and e-mail address of the persons awarding the applications	based on voluntary consent, contacting	the period of application and 3 month following its closure
photos and videos published on the Company's webpage about the awarding ceremony	based on voluntary consent, documentation, introduction of awarded companies to those interested	until the withdrawal of the individual consent of the applicants and the members of awarding committee
name and e-mail address of the persons subscribed for the newsletter, date of subscription	provision of information based on voluntary consent, contacting	from the subscription till the withdrawal, or if the e-mail sent with the purpose to update to data remains unanswered, three month after the date of sending of such e-mail

Type of data	Purpose and reason of data processing	Duration of data processing
<p>personal data of the users of the Company's sites on the community media (not closed group) Facebook/Google+/Twitter/Pinterest/YouTube/Instagram/LinkedIn etc., name of the person registered on the community media and the public profile photo of the user</p>	<p>provision of information to all data subject, who voluntarily registered on Facebook/Google+/Twitter/Pinterest/YouTube/Instagram/LinkedIn etc. and liked the Company's profile, contacting</p>	<p>data subject may be informed about the source of the data, their processing and the way and legal background of their transmission on the given community media. Data processing is done on the community media, therefore the duration and way of data processing, options of modification and cancellation of data are regulated by the data protection rules of the given community media.</p>
<p>name, address, type and number of ID document of the person filing a claim or complaint</p>	<p>judgement of the claim / complaint based on a legal procedure</p>	<p>5 years from sending the response</p>
<p>personal data of the agents in connection of administration of any matters related to the company, name, address and type and number of the ID document of the person acting for and on behalf of the data subject</p>	<p>administration of the data subject's matter, based on voluntary consent</p>	<p>5 years from resolving the given matter</p>

Type of data	Purpose and reason of data processing	Duration of data processing
name, address, type and number of ID document, phone number and e-mail address of the lawyer or the credit manager	based on legal interest, collection of outstanding receivables of the Company	8 years (accounting archiving) following the termination in case of a frame agreement, or performance in case of an ad-hoc order

Provision of data necessary for contracting is a condition of the use of the Company's services, in absence of them or in case of their later cancellation, the services of the Company cannot be used. Provision of the other data is voluntary, the later withdrawal of processing such data does not affect the legality of the former data processing.

III. Data controllers

Persons entitled to perform data controlling are the employees / agents of Complexpress Logisztika Kft.

IV. Transmission of data, data processing

In order to perform its activities, the Company is entitled to use the services of a data processing company. Data processors do not make any decision on their own, they act only on the basis of the agreement of the data controller company, and they have to follow the received instructions. The Company, as the data controller, controls the work of the data processors. Data processors are entitled to hire a further data processor only with the consent of the data controller. The Company employs data processors.

Data processors employed by the Company are listed in this Policy.

Data processors employed by the Company:

The Company employs a book-keeping company as data processor to perform the accounting tasks: MIDI Könyvelési Kft. (1173 Budapest, Uszoda u. 1. fszt. 4.) The developer of the client database management system and the place of running that system: Kelesys Kft. Számítástechnikai Kereskedelmi és Szolgáltató Kft. 2083 Solymár, Panoráma u. 44.

The operator of the Company's webpage: Profit&Partners Kft. (1096 Budapest, Thaly Kálmán u. 32.)

The Company transmits the following data to the below companies:

Data of the persons representing the applying company for the Webshop of the Year award to the awarding committee

Personal data for the purpose of administering the Company's legal matters to the lawyer: Dr. Rácz Iván, 1143 Bp., Thököly út 106.

The name, phone number and the addressee to the subcontractor participating to the deliveries:

- **MAGYAR POSTA ZRT.** 1138 Budapest, Dunavirág u. 2-6.
- **SPRINTER Futárszolgálat Kft.**, 1097 Budapest, Táblás utca 39.
- **FedEx**, Vecsés, Üllői utca 807/B, Airport City Logistic Park, Building C, 2220
- **TNT Express Hungary Kft.**, 1185 Budapest II. Logistics Centre – Office Building BUD International Airport Building 283
- **TCE Logistik Hungary Kft.**, 1211 Budapest Szikratávíró utca 17-21.
- **Quehenberger Logistics HU Kft.**, 1044 Budapest Ipari park utca 4.
- **Alois Scherrer AG**, Textillogistik & Transporte, Nebengrabenstrasse 16, CH-9430 St. Margrethen
- **MH|direkt**, Reitschulstr. 7, A-6923 Lauterach
- **E-PACKMAN**, st. 78 Jagiellonska, 03-301 Warsaw

The ID plate number of the company cars in case of parking payments initiated from the company mobile phones to the parking companies.

The ID plate number of the company cars for the payment of tolls to the highway operator.

V. Rights of data subjects in connection with the data processing

Rights of information: upon the request of data subject, data controller has to provide an easily accessible information in adequate extent, on adequate and simple language about the key aspects of data processing (how and who uses what information for what purposes, during which period).

Rights of access: the private person may inquire if his data have been processed and if so, what kind of his data are processed.

Rights of rectification: the data subject may report that the data processed are not correct and may ask for correction – data controller is responsible for the correctness, therefore it is useful to verify the correctness of data from time to time.

Rights to erase: data subject may ask for erasure of his data. In case the data controller provided access for third parties to the data to be erased, it has to inform all those parties to whom he made the data accessible in order to erase all references or personal data stored by those third parties.

Right to limit the data processing: in certain cases the data subject may ask to limit the processing of his personal data – e.g. in case of an unclear situation or of a legal dispute, or if the data processing is not necessary anymore, but the data subject would like to continue.

Right to data portability: data subject may ask to get his processed data in a detailed, widely used and machine readable form (e.g. .doc, .pdf etc.), and he is entitled to transmit these data to another data controller without any obstruction by the previous data controller. So it makes the data subject's situation easier to transmit his own data from one data controller to another.

Right to object: the data subject is entitled to object anytime – due to reasons in connection with his own situation - to the processing of his personal data for a certain purpose. This is a typical case when the data subject has not given his prior consent to the processing of his personal data.

Right to withdraw the consent: data subject is entitled to withdraw his consent anytime. Such withdrawal does not affect the legality of the data processing prior to the withdrawal.

Rights in connection with his data may be exercised by the data subject in a statement addressed to the data controller orally, in written form sent to a mailing address or to an e-mail address or via the webpage – practically on the same place where the data has been collected by the data controller in a legal way. In case of an oral request a written memorandum has to be prepared and a copy of it has to be handed over to the data subject.

In case the data subject has a complaint in connection with the data processing, we suggest to address it firstly to the data controller (the Company). Data controller has 25 calendar days to examine and answer the complaint. In case the data subject does not consider his complaint solved, he can turn to a court (competent according to the domicile of the data subject) or to the National Data Protection and Information Freedom Authority on the below contact details:

Mailing address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

URL <http://naih.hu>

GPS coordinates: W 47°30'56"; E 18°59'57"

This Policy can be amended by the Company.

Budapest, 11 October 2018

Complexpress Logisztika Kft.