

Privacy Notice

During the operation of its website, PearWilliams Hungary Kft. processes the personal data of users registered to the website in order to be able to provide its services to them.

PearWilliams Hungary Kft. wishes to comply with all legislations pertaining to privacy policy, especially to Regulation (EU) 2016/679 of the European Parliament and of the Council.

Present privacy notice about the protection of personal data of natural persons and the free movement of such data was based on the Regulation (EU) 2016/679 of the European Parliament and of the Council, honoring the contents of Act CXII of 2011 on Informational Self- Determination and Freedom of Information.

By submitting your personal data, you confirm that you have read the latest version (available at the time of the submission of the data) of present notice, and you agree specifically to its contents. Certain services may require the application of specific privacy terms, of which you shall receive information before the use of said services.

Data Processor

Name: **PearWilliams Hungary Kft.**

Representative: **Tamás János Cseh (mother's maiden name: Éva Hilda Kisfalusi) Managing Director**

Registered office: **Ipar utca 5., 1095 Budapest**

Company registration number: **01-09-978298**

VAT number: **23796856-2-43**

Public email address: **info@simnest.com** and **info@pearwilliams.com**

Website address: **www.simnest.com** and **www.pearwilliams.com**

Name, phone number and email address of the contact person: **Petra Jancsar, 0613539330, p.jancsar@pearwilliams.com**

Definitions

- **GDPR** (General Data Protection Regulation) is the new Privacy Policy Legislation of the European Union;
- **data processing**: any operation or set of operations performed on personal data or on sets of personal data, by automated or not automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **data processor**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

- **personal data:** 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, an identification 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;
- **data controller:** the natural or legal person, public authority, agency or 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 such processing are determined by European Union law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **consent of the data subject:** any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of his or her personal data;
- **personal data breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- **recipient:** a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- **third party:** a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

Principles of Data Processing

The data processor warrants that it shall process personal data according to the regulations of present privacy notice and other relevant acts and legislations, having particular regard to the following:

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

Personal data shall be collected for specified, explicit and legitimate purposes.

Personal data processing shall be adequate, relevant and limited to what is necessary.

Personal data shall be accurate and up to date; personal data that are inaccurate shall be deleted without delay.

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

The principles of data protection shall be applied to all personal data related to all identified or identifiable natural persons.

Important Data Processing Information

The reason of data processing for the Data Processor is to provide extra services to its clients by offering a newsletter subscription and using Google Analytics on its website, www.simnest.com and www.pearwilliams.com. Said extra services are provided based on a voluntary consent.

The legal basis for data handling and processing is always the voluntary consent of the data subject.

The data subjects involved in data processing are the persons subscribed to the newsletter service.

The data processing period and the deletion of personal data. The data processing period always depends on the purpose of the data processing, but said data must be deleted immediately if the goal of the data processing has been met. The consent for data processing can always be revoked by the data subject by sending an email to the contact address, or by clicking the unsubscribe link. If there's no impediment to the data deletion, said personal data must be deleted immediately.

Personal data is shared with the data processor and its employees.

The data subject may request access to its personal data; request to modify, delete or restrict the access to said data; raise objection against personal data processing and argue about its right for the migration of said data.

The data subject can revoke its consent for personal data processing, but the legality of previous data processing that was based on the consent of the data subject shall remain unaffected.

The data subject may exercise its right to file a complaint to the surveillance authority.

The data subject has the right to request the immediate modification or correction of its imprecise personal data from the data processor.

The data subject has the right to request the immediate deletion of its imprecise personal data from the data processor, and the data processor is required to delete said personal data in absence of other legal basis for data processing.

The modification or deletion of personal data may be requested via email, telephone or mail. Contact details are provided above.

Newsletter service

As operators of the website, we warrant that the informations and notices presented here are all compliant with the relevant legislative provisions. However, when subscribing to the newsletter, we cannot review the genuineness of the contact information, nor identify if said subscriber is an individual or a company. Companies that contact us are always regarded as business partners.

The purpose of the data processing is to keep in contact with the subscribers, and inform them about new articles via an email newsletter, of which they can unsubscribe at any time, without further consequences. You can also unsubscribe without any consequences if your company has closed, you quit, or if someone has subscribed with your contact information.

The legal basis for data processing is your voluntary consent. We inform you that you can give your specific consent in advance to authorize us to contact you with our newsletters, advertisements, information notices and other messages via email. Due to this, you may also consent to the processing of your personal data by the service provider.

We inform you that if you would like to receive a newsletter, you have to provide the necessary personal information. In absence of this, we cannot send you a newsletter.

Data processing period: data processing is due until the revocation of the authorization.

Your consent to data processing may be revoked at any time by sending an email to our contact address.

The deletion of data is initiated after the revocation of the authorization. Your consent to data processing may be revoked at any time by sending an email to our contact address.

You can also revoke your consent by clicking the unsubscribe link in our newsletter.

Your personal data is shared with the data processor and its employees.

Data storing methods: electronic, mailchimp.com.

The modification and deletion of the personal data may be initiated via email, telephone or mail. Contact details are provided above.

Types of processed data, and the purpose data processing:

- name - identification, communication
- email address - identification, communication
- date of subscription - default technical action
- IP address - default technical action

Social media services

Social media services are media services with which messages can be spread through the users of said social media service. Social media exploits the internet and other online formats to transform users from content consumers to content creators.

Social media services provide a venue that is filled with content created by the users, for example, Facebook, Google+, Twitter, etc.

Social media can take various forms, like public speeches, lectures, presentations, and the introduction of products and services.

The most common types of information featured in social media are forums, blog posts, photo, video and audio materials, message boards, email messages, etc.

Due to this, processed personal data may include the public personal photo of the data subject.

Data subjects: all registered users.

The purpose of data processing: publicizing and advertising our website, all related websites and our services.

The legal basis for data processing is the voluntary consent of the data subject.

Duration of data processing: according to the terms and conditions of the social media website.

Due date for deleting personal data: according to the terms and conditions of the social media website.

Personal data may be shared with the following: according to the terms and conditions of the social media website.

Rights related to data processing: according to the terms and conditions of the social media website.

Data storing method: electronic.

It is important to consider that when the data subject uploads or shares his or her personal data, he or she gives global consent to the operator of the social media website to store and process said data.

Due to this, it is very important to ensure that the data subject has full authority to share said data.

Google Analytics

Our website uses the services of Google Analytics.

Google Analytics creates reports about user habits for their clients by the use of internal cookies.

On behalf of the website operator, Google uses this information to evaluate user habits related to the website. As an additional service, Google also creates reports for the website operator about website activity, in order for the operator to be able to deliver additional services.

Google stores data in encrypted form to prevent data theft and make it harder for outsiders to access said data.

Google Analytics can be disabled by the following method. Taken from the website:

Website visitors who don't want Google Analytics JavaScript to create reports about their habits may install the add-on to disable Google Analytics. The add-on disables Google Analytics JavaScript's ability (ga.js, analytics.js, dc.js) to send user information to the Google Analytics system. The add-on is compatible with most new web browsers. However, the use of the add-on will not prevent data to be sent to the website or to other online reporting services.

<https://support.google.com/analytics/answer/6004245?hl=hu>

Google's privacy policy: <https://policies.google.com/privacy?hl=hu>

For detailed information about the processing and protection of personal data, please follow the link above.

Detailed privacy policy:

https://static.googleusercontent.com/media/www.google.com/en//intl/hu/policies/privacy/google_privacy_policy_hu.pdf

Google Analytics Cookie

Google Analytics is the analytics tool of Google, which helps website and application owners to get a clear picture of their users' activity. The service may use cookies to collect information and create reports for Google, based on the statistic data related to website use without individually identifying the visitors.

The main cookie used by Google Analytics is the „_ga” cookie. Its primary function is to create reports based on statistic data related to website use, but it may also be used (along with the other cookies mentioned above) to create customized advertisements in Google applications (for example, Google Search) and on the internet.

Website visitors who don't want Google Analytics to create reports about their visits may install the add-on to disable Google Analytics. The add-on disables Google Analytics JavaScript's ability (ga.js, analytics.js, dc.js) to send user information to the Google. Users who install the add-on cannot use Google Analytics Content Experiments either.

If you would like to disable the online activity of Analytics, visit the opt-out site of Google Analytics (<http://tools.google.com/dlpage/gaoptout>), and install the add-on to your browser. For more information about installing and uninstalling the add-on, please consult your browser's help center.

If you will not accept the use of cookies, certain functions will not be available to you. For more information about deleting cookies, please visit the following links:

Internet Explorer:

<http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11>

Firefox:

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Chrome:

<https://support.google.com/chrome/answer/95647?hl=en>

Data Processors

Web hosting service: tsohost.com

Your personal data is stored on a server operated by our web hosting partner. The data may only be accessed by our colleagues and the employees of the hosting partner, but both of them are equally responsible for protecting the privacy of your personal data.

Type of activity: web hosting, server hosting.

The purpose of data processing: to ensure the operation of the website.

Type of data processed: personal data submitted by the data subjects.

The duration of data processing and the due date for deleting personal data. Personal data is processed to the extent of the operation of the website and according to the contractual agreement between the website operator and the hosting service provider.

The legal basis for data processing is the voluntary consent of the data subject, or data processing based on legal obligation.

Rights related to data processing

Right to request information

You may request information about the types of data collected, as well as the legal basis, purpose, data source and duration of the data processing. At your request, we will send all information to your public email address as soon as possible, within 30 days.

Right to data modification

You may request the modification of your personal data. At your request, we will modify your data and send a notification to your public email address as soon as possible, within 30 days.

Right to erasure

You may request the erasure of your data. At your request, we will delete your personal data and send a notification to your public email address as soon as possible, within 30 days.

Right to restriction

You may request the restriction of access to your data. The restriction will be in effect as long as the cause of the restriction makes it necessary. At your request, we restrict the access to your data and send a notification to your public email address as soon as possible, within 30 days.

Right to object

You may object to the processing of your personal data. Following the submission of your objection form, we will review if your objection is well-founded, and send a notification to your public email address as soon as possible, within 15 days.

Right to judicial remedy

If you believe your personal data is processed unlawfully, please contact us immediately in order to restore the legality of the data processing. We will do everything in our power to resolve the problem presented.

If you believe that the legality of the situation cannot be restored, or for any other reason you consider the processing of your data injurious, you have the right to the following remedies:

Right for complaint

If the data subject believes that the personal data handling practice of the Kft. infringes the provisions of existing data protecting legislations, especially the GDPR, then said subject has the right to issue a complaint to the Hungarian National Authority for Data Protection and Freedom of Information.

Hungarian National Authority for Data Protection and Freedom of Information

Website: <http://naih.hu>

Address: Szilágyi Erzsébet fasor 22/C, 1125 Budapest

Mail address: Pf. 5., 1530 Budapest

Phone number: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

The data subject also has the right to issue a complaint to other Data Protection Authorities founded in an EU state that serves as a temporary residence and/or workplace for said subject, or where the presumed infringement took place.

Right for Direct Action

The data subject - regardless of its right for complaint - can take direct action if its rights provided by the GDPR have been infringed during the handling of its personal data.

Against the Hungarian data handler, action can only be brought in front of a Hungarian jury.

If the subject wishes to take action against the data processor, said subject must take action in a jury of the EU member state in which the data processor has its primary place of business.

The subject should proceed with the lawsuit to the jury of its place of residence. The list of Hungarian juries can be found at the following link: <http://birosag.hu/torvenyszekek>.

If the primary place of residence of the data subject is in a different EU member state, said subject can take direct action in the jury of its primary place of residence having the necessary jurisdiction and authority.

Other legal actions

The data subject has the right to entrust a body or nonprofit organization to file a complaint, start a lawsuit, initiate the judicial review of the decision of the surveillance authority and to enforce the subject's right for compensation in the name of the subject. For said body or organization, it is mandatory that it has been founded in accordance with the legislation of an EU member state, and its fund rules must clearly state its main goals as civil service and the protection of the rights and freedom of data subjects in relation to personal data.

Relevant acts

- Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 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 Directive 95/46/EC (General Data Protection Regulation)
- Act CXII of 2011 on Informational Self- Determination and Freedom of Information
- Act LXVI of 1995. on Public Records, Public Archives, and the Protection of Private Archives
- Government decree 335/2005. (XII. 29.) on the Common Provisions of the Document Management in Public Administrative Bodiesú
- Act CVIII of 2001 on certain issues of Electronic Commerce Services and Information Society Services
- Act C of 2003 on Electronic Communications