

# PRIVACY POLICY

Silvestris & Szilas Ltd. is committed to respecting and protecting your personal data because it helps us to build a relationship of trust with you. By drawing up our 'Personal Data Protection' Code of Conduct, we have already made a commitment to identifying and implementing adequate technical and organisational measures to ensure secure processing of your personal data.

In this Privacy Policy, you will find relevant information about how we use the personal data of users of our website [www.silvestris.hu](http://www.silvestris.hu).

This will inform you of your rights regarding the processing of your personal data, the purposes for and grounds on which your data is processed, the recipients of your data, and the period for which it is stored.

The reference texts for this policy are the General Data Protection Regulation (GDPR) and the Hungarian Data Protection Act.

## **The controller of your personal data**

The controller of your personal data is Silvestris & Szilas Ltd., a company with a Board of Directors and a Supervisory Board, with capital of €15,530,083, located at H-2144 Kerepes Vasút utca 42. Registered under number 13 09 070943.

We process your personal data in our capacity as data controller; i.e. we are responsible for processing and protecting your personal data.

## **What personal data is collected?**

Silvestris & Szilas Ltd. may collect and process the following personal data:

- Surname
- First name
- Company name
- Email address
- Telephone number (landline/mobile)

In addition, Silvestris & Szilas Ltd. automatically collects anonymous information on how you use the website. For example, Silvestris & Szilas Ltd. will automatically record which sections of the [www.silvestris.hu](http://www.silvestris.hu) website you visit, which web browser you use, and which website you were visiting when you accessed the [www.silvestris.hu](http://www.silvestris.hu) website. We cannot identify you from this data, but it allows Silvestris & Szilas Ltd. to compile usage statistics for the [www.silvestris.hu](http://www.silvestris.hu) website.

## **Why do you use my personal data?**

We process personal data in the following categories on the grounds of our legitimate interests, which are described in detail in this Privacy Policy. We are committed to imposing clearly defined limits on each of these uses to ensure respect for your privacy and that we only use information that is necessary to achieve these legitimate objectives. Our main aim is to improve our services and communication, and to make

sure they are tailored to the profile of each of our users. We also intend to ensure that the personal data of all of our users is respected and protected.

PURPOSES	DETAILS
<b>Managing contact requests via forms on the website</b>	We only process personal data that is strictly necessary to manage or resolve your request or query.
<b>Sharing content on social media</b>	The use of social media to interact with Silvestris & Szilas Ltd. (in particular tools such as Facebook Messenger, Facebook Connect and the ‘Share’ button on Facebook, Instagram, LinkedIn) may lead to data being shared between Silvestris & Szilas Ltd. and these social media platforms. As a result, if you are logged in to Facebook on your computer and you browse a page on the Silvestris & Szilas Ltd. website, Facebook may collect this information. Please refer to the personal data protection policies of the various social networks for more information on the personal data they may provide. If you do not want these social networks to collect your data when you are on the Silvestris & Szilas Ltd. website, we recommend logging out of these platforms before browsing our Website.
<b>For marketing purposes: newsletter, delivery of targeted advertising on the website and social media.</b>	If you have subscribed to our newsletter, we will process your personal data to manage your subscription, including the sending of corporate information. This data processing includes analysing your user profile to

	identify your preferences and therefore the most suitable products or services. For example, based on your browsing history, we will suggest products we think you may be interested in.
<b>Statistics on visitors to the website via mobile and computer</b>	When you access our website, you are informed that we will process your browsing data for analytical and statistical purposes; i.e. to understand how users interact with our <a href="http://www.silvestris.hu">www.silvestris.hu</a> website in order to improve it.

Silvestris & Szilas Ltd. considers all of the above-mentioned data processing operations necessary to respond to requests for information on the website.

## What are the grounds for processing my personal data?

The legal grounds that allow us to process your personal data depend on the purpose for which it is processed, as explained in the following table:

PURPOSES	GROUNDS
<b>Managing contact requests via forms on the website</b>	We believe we have a legitimate interest in responding to requests or queries you submit via the various contact methods available. We believe the processing of this data is also in your interest when it allows us to manage your requests and respond to questions asked. When your question concerns the exercise of the rights of which you are informed below, the processing of your data is based on compliance with the legal obligations to which we are subject.

<p><b>Sharing content on social media</b></p>	<p>This purpose includes the processing of your data subject to your consent, in particular using photos or videos you have shared publicly on the website or via our social media pages, if you have given your consent for us to do so.</p>
<p><b>For marketing purposes: newsletter, delivery of targeted advertising on the website and social media.</b></p>	<p>The legitimate basis for processing your data for marketing purposes is the consent you give us by, for example, agreeing to receive personalised information through various methods (email or targeted advertising on the website and social media) In order to provide you with personalised information, we believe we have a legitimate interest in creating a profile with information we have about you (your preferences or browsing history) and the personal data you have provided to us, since we believe the processing of this data is also in your interests. Indeed, it allows us to improve your user experience and access information according to your preferences.</p>
<p><b>Statistics on visitors to the website via mobile and computer</b></p>	<p>We believe we have a legitimate interest in analysing usability and user satisfaction, since our aim is to improve the user experience and offer a better-quality service.</p>

## **How long will my data will be stored?**

How long your data is stored depends on the purposes for which it is processed, as explained below. All periods set out in legislative and regulatory texts are adhered to if applicable.

PURPOSES	STORAGE PERIODS
<b>Managing contact requests via forms on the website</b>	We will process your data for the period of time necessary to respond to your request or query.
<b>Sharing content on social media</b>	We will process your personal data until you delete your profile on the relevant social network and/or at your specific request.
<b>For marketing purposes: newsletter, delivery of targeted advertising on the website and social media.</b>	We will process your personal data until you unsubscribe from the newsletter.
<b>Statistics on visitors to the website via mobile and computer</b>	We will process your data occasionally for the duration of an action or specifically for a quality survey.

## Is my data shared with third parties?

Silvestris & Szilas Ltd. will not disclose your personal data to third parties, unless this is deemed necessary for Silvestris & Szilas Ltd.’s provision of services and their optimisation (for example, maintenance work on the [www.silvestris.hu](http://www.silvestris.hu) website). In this regard, your personal data may be disclosed to software providers, cloud partners, external IT consultants or service providers. If, in this context, Silvestris & Szilas Ltd. needs to disclose your personal data to third parties, the relevant third party will be obliged to use your personal data in accordance with this Privacy Policy.

Silvestris & Szilas Ltd. may also have to disclose your personal data to the relevant authorities (i) when Silvestris & Szilas Ltd. is bound to do so by law or in the case of legal proceedings and (ii) to enforce and defend its rights.

## **What are my rights when I give you my data?**

We undertake to maintain the privacy of your personal data and to enforce the exercise of your rights as a resident of the European Union. As the data controller, we have agreed that these rights may be exercised by sending us an email at a single email address ([silvestris@silvestris.com](mailto:silvestris@silvestris.com)), simply stating the reason for your request and the right you wish to exercise. If we deem it necessary to identify you, we may request a copy of an identity document.

Regardless of the purpose or legal basis on which your data is processed, you have the right to:

- Access the personal data Silvestris & Szilas Ltd. may have about you;
- Correct, add to or update your personal data;
- Delete your personal data ('right to be forgotten')

(Silvestris & Szilas Ltd. would like to make it clear that in this case, you would no longer be able to access some services and/or some services may no longer be provided if you delete or request deletion of certain personal data that is required);

- Limit processing of your personal data;
- Transfer your personal data;
- Object to/oppose the processing of your personal data.

-In addition, through your account, you may at any time update, edit and/or check the personal data you provided when creating your account, if applicable.

If you have given us consent to process your personal data for a given purpose, you have the right to withdraw it at any time via:

-The 'Unsubscribe' link

-Your user account

As explained in paragraph IV, when the processing of your data is based on your consent or the performance of a contract, you will also have the right to request portability of your personal data. This means you will have the right to receive the personal data you have given us in a structured, current and machine-readable format that can be transferred directly to another party, provided this is technically possible.

In addition, if the processing of your data is based on our legitimate interests, you will also have the right to oppose the processing of your data.

Finally, you are hereby informed of your right to make a claim to the relevant supervisory authority for data protection.

## **What security measures are taken to protect my data?**

As the data controller, the Silvestris & Szilas Ltd. takes all necessary precautions to ensure the security and privacy of your data and, in particular, to prevent it from being changed, damaged or accessed by an unauthorised person.

Similarly, our subcontractors undertake to respect the security and privacy of data, in particular with regard to maintenance operations and techniques to develop the [www.silvestris.hu](http://www.silvestris.hu) website.

## **Cross-border personal data processing**

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose home or place of business is a country that does not have an adequacy decision, issued by the European Commission, will be governed by a data transfer agreement, which will include (i) the general contractual terms set out in the ‘European Commission Decision of 5 February 2010 (Decision 2010/87/EC)’, or (ii) any other mechanism based on legislation concerning privacy or any other regulation concerning personal data processing.

## **Changes to the Privacy Policy**

The information contained in this Privacy Policy may be changed if deemed necessary.

We suggest reviewing this Privacy Policy regularly to keep up to date with any changes, since it will remain a constant point of reference on our website.

## **Information about cookies**

We use cookies and similar technologies, subject to your consent, to help you navigate our website, to understand how you interact with us and, in some cases, to show you adverts tailored to your browsing habits. Please read our Cookie Policy to find out more about the cookies and similar

technologies we use, their purpose and other relevant information.

### **What is a cookie?**

A cookie is a small text file that a website stores on your PC, mobile phone or any other device to collect data concerning your browsing on the website. Cookies are necessary to help with navigation and make it more enjoyable. They do not cause any damage to your computer.

### **What are cookies used for on this website?**

Cookies are an essential part of how our website works. Our cookies are used mainly to optimise your browsing experience. They make it possible, for example, to remember your preferences while browsing and on future visits. Data collected using cookies allows us to improve our website by estimating usage numbers and patterns, tailoring the website to the interests of each user, speeding up searches, etc. We may occasionally, with your prior agreement, use cookies, tags or other, similar technologies to obtain information allowing us, either on our website, on third-party websites or by any other means, to show you targeted adverts based on your browsing habits. By clicking on the buttons on our website to share content on social media, cookies may be installed in your browser. These social networks may also track your browsing on our websites and thereby collect data without you even clicking on these buttons. The information collected may, if applicable, influence the content of the adverts you see on these social networks based on your interests.

### **What are cookies NOT used for on this website?**

We do not store sensitive personal information, such as your address, password, credit or debit card details, etc., in the cookies we use.

**Who uses the data stored in the cookies?**

The information stored in the cookies on our website is used exclusively by us, except for cookies hereinafter referred to as ‘third-party cookies’, which are used and managed by external parties to provide us with services we have requested with the aim of improving our services and the user browsing experience. The main purpose of ‘third-party cookies’ is to provide us with access statistics and to secure payment transactions made.

**How can I prevent the use of cookies on this website?**

If you do not want to use cookies on this website, bearing in mind the above-mentioned limits, you firstly need to deactivate the use of cookies in your browser and then delete the cookies stored in your browser associated with this website. You can do this at any time.

**How do I deactivate and prevent the use of cookies?**

You can restrict, block or delete cookies on this website at any time by changing your browser configuration, as described below. Although settings differ from one browser to another, the configuration of cookies is usually carried out in the ‘Preferences’ or ‘Tools’ menu. For more information on the configuration of cookies in your browser, please go to your browser's ‘Help’ menu.