



PRIVACY NOTICE

1. The purpose of the Notice

The purpose of this Notice is to lay down the privacy and data processing policy adopted by **Crystal WorldWide Szolgáltató Zártkörűen Működő Részvénytársaság**

Registered seat: H-2161 Csomád, Verebeshegy utca 11.

Branch office: H-1145 Budapest, Amerikai út 59.

Company registration number: 13 10 041858

Tax number: 26506946-2-13

Phone number: +36 1 383 0333

Web: www.crwwgroup.net

E-mail: info@crwwgroup.net

Represented by: dr. MAGYAR Csaba, Chief Executive Officer

(hereinafter referred to as **Controller**) and to provide the visitors of the www.crwwgroup.net website (hereinafter referred to as **Website**), as private individuals concerned by the processing, with adequate information in connection with the processing of their personal data. The Controller is committed to ensuring that in the course of its activities it fully complies with the provisions of this Notice and the legislation on the processing of personal data as described below.

In developing these rules, the Controller took particular account of

- ✓ the Fundamental Law;
- ✓ Act V of 2013 on the Civil Code (hereinafter referred to as Civil Code);
- ✓ Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Privacy Act);
- ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).

The Controller is not required to appoint a Data Protection Officer under Article 37(1) of the GDPR.

2. Terms used in the Notice

Processing by a processor: the performance of technical tasks related to data processing operations.

Processing by the controller: any operation or set of operations which is performed upon the data, regardless of the procedure used, in particular collection, recording, organisation, storage, alteration, use, consultation, transmission, disclosure, alignment or combination, blocking, erasure and destruction, as well as prevention of further use of the data, taking of photographs, audio or video recordings.

Controller: a natural or legal person or a company having legal personality who or which, alone or jointly with others, determines the purposes of the processing of data, takes and implements decisions regarding the processing (including the means used) or has them implemented by a processor that it assigns.

Transmission: making data available to a specified third party.

Data erasure: making data unrecognisable in such a way that it cannot be recovered.

Personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Pseudonymisation: the processing of personal data in such a manner that the personal data can no longer be attributed to a specific natural person without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

eDM (electronic Direct Mail): One of the tools of direct marketing, advertising mail, marketing message. Following the Data Subject's prior consent to that effect, the Controller may send advertising and marketing messages by e-mail to the Data Subject's e-mail inbox.

Data Subject: the natural person whose personal data are concerned by the processing.

Third party: a natural or legal person or any other body which is not the same as the Data Subject, the Controller, the Processor or the persons who, under the direct authority of the Controller or the Processor, are authorised to process personal data.

Consent: a voluntary and explicit expression of the Data Subject's will, based on appropriate information, by which they give their unambiguous consent to the processing of personal data concerning them, whether in full or in relation to specific operations.

Personal data: data which can be associated with a specific natural person, in particular their name, identification number and one or more factors specific to their physical, physiological, mental, economic, cultural or social identity, and any conclusion that can be drawn from the data concerning them, which is not considered as data of public interest and data public on grounds of public interest. Personal data includes, among other things, name, address and e-mail address.

Objection: a statement by the Data Subject objecting to the processing of their personal data and requesting the cessation of the processing or the erasure of the processed data.

3. **Processing principles**

The processing carried out by the Data Controller complies with the data processing principles of the GDPR, which are the following:

The principles of lawfulness, fairness and transparency: The processing of personal data must be lawful, fair and transparent for the data subject.

The principle of purpose limitation: Personal data must be collected for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes.

Principle of data minimisation: Personal data must be adequate, relevant and limited to what is necessary for the purposes for which they are processed.

Principle of accuracy: The personal data must be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay.

Storage limitation: Personal data must be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed.

Principle of integrity and confidentiality: Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Principle of accountability: The Controller is responsible for compliance with the principles and must be able to demonstrate such compliance.

In addition to the principles of data processing, the requirement of adequate information can be identified as a common requirement, as the Controller must inform Data Subjects of the processing in the case of any legal basis for processing.

4. The activities involved in each processing operation, the definition of the data processed, the legal basis and purpose of the processing and the duration of the processing

4.1. Contact

The Controller shall provide the opportunity for the Data Subject to contact the Controller free of charge for consultation, appointment or call-back. The Controller shall provide contact details, such as e-mail address and telephone number, which can be used to contact the Controller in the “Contact” section of the Website. In the course of the online electronic contact provided by the Controller directly on the platform, the Data Subject’s request shall be sent to the info@crwwgroup.net e-mail address of the Controller.

Regardless of the method of contact, the enquiry shall be received by the Controller’s customer relations officer, i.e. the receptionist, who shall contact the Data Subject for an appointment and personal meeting. The telephone enquiry shall be connected by the Controller’s receptionist to the employee authorised to deal with the matter or an appointment shall be made with the caller for the purpose set out above. If an employee of the Controller is called, but the connection is unsuccessful, the name and the telephone number of the caller, the name of the employee called and possibly the subject of the enquiry shall be recorded on paper by the receptionist. The enquiry shall be handed over to the employee on paper by the receptionist for further handling.

Personal data provided electronically shall be stored in electronic form on a central server owned by the Company, while personal data recorded on paper shall be stored in a locked location at the Controller’s seat.

Identification of the data concerned by the processing	the name, telephone number and e-mail address of the Data Subject and other personal data voluntarily provided by the Data Subject
Purpose of processing	contact between the Data Subject and the Controller primarily for the purpose of making an appointment, free consultation, call-back.
Legal basis for processing	The Data Subject has given their consent to the processing of their personal data for one or more specific purposes – <i>Article 6 (1) a) of the GDPR</i>
Duration of processing	The personal data provided by the Data Subject shall be deleted immediately if the attempt to contact is unsuccessful. In the case of an assignment, the data shall be deleted after the matter concerning which the contact was made has been settled.

4.2. Subscription to newsletter

Data Subjects have the possibility to subscribe to the Controller’s newsletter service on the Website. The Controller shall inform the subscribed Data Subjects by means of newsletters about news related to its current and future service activities, send them advertising and information messages. The newsletter shall be sent by the Controller at regular intervals to the e-mail addresses of those who have subscribed to the newsletter service.

The Controller shall store e-mail addresses exclusively in an electronic database. The e-mail address of the Data Subject who subscribes to the newsletter may be included in the database only with the Data Subject’s explicit consent and separate subscription. The Controller shall not process any personal data of the Data Subject other than the e-mail address.

In the case of unsubscription, the withdrawal of consent shall not affect the lawfulness of the processing based on the consent prior to its withdrawal. When subscribing on the website, the Data Subject shall be informed that their subscription has been successful, and they shall receive an electronic message of this fact.

Identification of the data concerned by the processing	The Data Subject’s e-mail address
Purpose of processing	Sending newsletters to subscribers, i.e. sending an electronic message containing advertising, information to the Data Subject in connection with the Controller’s service activities.
Legal basis for processing	The Data Subject has given their consent to the processing of their personal data for one or more specific purposes – <i>Article 6 (1) a) of the GDPR</i>

Duration of processing	The Controller shall send the newsletters to the Data Subject until the Data Subject unsubscribes or requests the deletion of their data and the cessation of the processing. The Data Subject may unsubscribe directly from the newsletter at any time, free of charge. If the Data Subject wishes to withdraw their consent granted to the Controller for the sending of newsletters (i.e. they wish to unsubscribe from the newsletter, withdraw their consent), they can do so by sending an e-mail to the info@crwwgroup.net address or by using the “unsubscribe” option directly in the e-mail (electronic message) containing the newsletter. In this case, the Controller shall no longer send newsletters.
Processor	Mailchimp

4.3. Cookies

A cookie is a small text file that is stored on the hard drive of the Data Subject’s computer or mobile device until the expiry time set in the cookie and is reactivated on subsequent visits. Its purpose is to record information about the visit and personal settings, but this data cannot be linked to the visitor personally. It helps to design a user-friendly website and to enhance the online experience of the Data Subject.

If the Data Subject does not consent to the use of cookies by the Controllers when the Data Subject browses the website, the website may not function properly. The Data Subject has the option to choose one or more of the cookies with the features described below in the “Customise” menu item.

Essential cookies

These cookies ensure the proper functioning of the Website and facilitate its use; without them it is more difficult or impossible to ensure the comfortable use of the Website. These cookies collect information about the use of the Website without identifying visitors. Some of them are deleted as soon as the visitor closes the browser (session cookies), while others are saved by the visitor’s device or browser until their storage period expires or they are deleted by the visitor (persistent cookies). Cookies are automatically placed on the user’s device when browsing the Website. They can be deleted subsequently and independently in the browser settings.

Functional cookies

These cookies enable special features and customisation. The cookies are placed by the Controller or by a third party whose services have been included by the Controller on the Website. If the Data Subject does not authorise the use of these cookies, the aforementioned features may not function properly.

Analytical cookies

Analytical cookies are used to understand how visitors interact with the website. These cookies provide information about the number of visitors, bounce rate, traffic source, etc. These cookies do not identify the Data Subjects either, the information they collect relates to, for example, which part of the site the visitor clicked on, how many websites or pages they visited, how long the viewing time of each session was, what error messages they received, etc. We have also made a distinction between persistent and session cookies among analytical cookies, depending on how long they are stored on visitors’ browsers or devices. Analytical cookies are automatically placed on the data subject’s devices when browsing the websites. They can be deleted subsequently in the browser settings.

Performance cookies

These cookies are related to the performance and development of the Website, the improvement of the user experience and allow the Controller to collect data related to how visitors use the Website.

Advertising cookies

These cookies ensure that the Website works effectively, and that marketing is kept up to date. Targeted cookies are also useful for Data Subjects, as they enable the Controller to display advertisements on the Website that may be of interest and relevance to users. These cookies are therefore used by the Controller to track the activity of visitors on the website for the purpose of enhancing the user experience and facilitating online marketing activities.

In addition to the IP address of the Data Subjects, the Controller does not store any personal data in the cookies, nor does it transfer them to third parties, which the Data Subject provided during the use of the Website or during registration, and the Controller only stores data in these cookies that identify the Data Subject's activity on the Website. Cookies can be deleted by the Data Subject from their IT device, or they are automatically deleted when the browser is closed, depending on the setting of the device, and the Data Subject can manually set their browser to disable the use of cookies.

Identification of the data concerned by the processing	Only the IP address of the Data Subject, apart from which, the Controller stores all analytical information without a name or other personal data
Purpose of processing	Identification of visitors to the Website as Data Subjects, automatic recording of data about their access and use habits by using cookies, the purpose of which is to enable or facilitate the session, improve the user experience, customisation, data collection for statistical purposes.
Legal basis for processing	The Data Subject has given their consent to the processing of their personal data for one or more specific purposes – <i>Article 6 (1) a) of the GDPR</i>
Duration of processing	The Data Subject can delete cookies stored on their computer or mobile phone at any time through their browser's settings.
Processor	Google Analytics

Notice of popular browsers on the deletion of cookies:

Google Chrome: https://support.google.com/chrome/answer/95647?hl=hu&ref_topic=7438325

Mozilla Firefox: <https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito>

Microsoft Edge: <https://support.microsoft.com/hu-hu/microsoft-edge/a-b%C3%B6ng%C3%A9sz%C3%A9s-el%C5%91zm%C3%A9nyek-megtekint%C3%A9se-%C3%A9s-t%C3%B6rl%C3%A9se-a-microsoft-edge-ben-00cf7943-a9e1-975a-a33d-ac10ce454ca4>

4.4. Presence in social media

The Controller operates the following social media sites:

- it manages the Crystal Worldwide Group page on Facebook;
- the crwwgroup page on Instagram;
- the Crystal Worldwide Group page on LinkedIn
- the "Pénzügyi nyugalom szigete" ("Island of Financial Calm") channel on YouTube.

Identification of the data concerned by the processing	the Data Subject's name and image
Purpose of processing	information on current information, news concerning the Controller, content relevant to Data Subjects and job vacancies.
Legal basis for processing	The Data Subject has given their consent to the processing of their personal data for one or more specific purposes – <i>Article 6 (1) a) of the GDPR</i>
Duration of processing	The Data Subject can voluntarily unsubscribe from the pages and the channel or delete unwanted messages on the wall using the wall settings.
Processor	Facebook, Instagram, LinkedIn, YouTube

5. Processors

5.1. The Controller relies on the following processors in the processing of personal data:

Name of processor	Contact information	Responsibilities
Meta Platforms Ireland Limited	Ireland, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2	Facebook, Instagram
Google Ireland Limited	Ireland, Gordon House, Barrow Street Dublin 4	Google Analytics YouTube

The Rocket Science Group LLC (Mailchimp)	www.mailchimp.com	newsletter provider
LinkedIn Corp	1000 W Maude Ave, Sunnyvale, CA 94085, United States	LinkedIn

- 5.2. The Processors' activities related to data processing involve the provision of technical support. The Processors are not allowed to make any substantive decisions regarding the processing, they may only process personal data of which they become aware in accordance with the instructions of the Controller, they may not process personal data for their own purposes, and they are obliged to store and retain personal data in accordance with the instructions of the Controller.

Find the privacy policy of Facebook at the link below:

<https://www.facebook.com/privacy/explanation>

Find the privacy policy of Instagram at the link below:

<https://help.instagram.com/519522125107875>

Find the privacy policy of Mailchimp at the link below:

<https://mailchimp.com/gdpr/>

Find the privacy policy of LinkedIn at the link below:

<https://privacy.linkedin.com/gdpr>

Find the privacy guidelines of YouTube at the link below:

https://support.google.com/youtube/answer/7671399?hl=hu&p=privacy_guidelines

6. Data transmission

The Controller shall not, as a general rule, disclose personal data in its possession to third parties in any way whatsoever without the prior consent of the Data Subject. The Controller draws attention to the fact that any personal data received at the contact e-mail address indicated on the Website shall be processed on the basis of the provisions of this Notice.

7. Data security

The Controller shall store the personal data referred to above on paper at its seat and in its own IT system. The Controller undertakes to ensure the security of the data in accordance with the GDPR and the Privacy Act, taking into account the rights of the Data Subjects.

It shall maintain records of possible data protection incidents and, if necessary, inform the Data Subject and, where necessary, the National Authority for Data Protection and Freedom of Information (NAIH) about the incidents.

Access to personal data shall only be granted to persons acting in the interest of the Controller, in particular agents and employees, who need it for the performance of their activities and who are aware of and are familiar with the obligations relating to the processing of the data.

The Controller shall take all necessary measures to ensure the safe and secure processing of the data and the establishment and operation of the necessary data processing systems. The Controller shall ensure that the processed data cannot be accessed, disclosed, transmitted, modified or deleted by unauthorised persons.

The Controller undertakes to ensure the security of the data by means of state-of-the art and the most appropriate equipment and security rules, in particular to prevent unauthorised access, unlawful disclosure, deletion or destruction. The Controller shall do its best to ensure that data is not accidentally damaged or destroyed. The Controller shall also impose the above commitment on its employees involved in data processing activities.

The Controller shall not collect sensitive data, i.e. data revealing racial or ethnic origin, membership of national or ethnic minorities, political opinions or party affiliations, religious or philosophical beliefs, membership of representative associations, health condition, pathological addiction, sex life, or criminal records.

8. The Data Subject's rights in the course of data processing

The Data Subject shall have the following rights during the period of data processing:

Right of information

The Controller must provide information in an appropriate manner, in simple and accessible language that is easy to find (online or offline) on the relevant aspects of the processing. At the time of obtaining the personal data, or if the Data Subject subsequently requests information, the Data Subject shall be provided with the Privacy Notice and shall be asked to sign a declaration of acknowledgement, understanding and acceptance of the information contained therein.

The Data Subject shall have the right to request information at any time about the personal data processed by the Controller relating to them. Information can also be requested at the e-mail address indicated in the Notice or by post. The Controller shall provide the requested information within 30 days of the request.

Right to erasure

The Data Subject shall have the right to obtain from the Controller the erasure of personal data concerning them without undue delay and the Controller shall have the obligation to erase personal data concerning the Data Subject without undue delay. Where the Controller allows third parties access to the data requested to be erased, all those to whom the data concerned have been disclosed must be informed of the requirement to erase all references to and personal data held by them. The purpose is to ensure that, unless there is a legal or reasonable impediment, the data concerned "disappear" from any databases that can be found.

The erasure need not be carried out if the processing

- ✓ is necessary for the exercise of freedom of expression or the right to information;
- ✓ is necessary for the establishment, exercise or defence of legal claims;
- ✓ is necessary for compliance with a legal obligation;
- ✓ is necessary for archiving purposes in the public interest, scientific or historical research, statistical purposes and the erasure of the data would make impossible or seriously jeopardise the purpose of the processing.

The Controller shall also erase the personal data contained in its documentation relating to the Data Subject if the purpose for which the personal data were processed ceases to exist. In the case of paper documents, a record must be drawn up of their destruction in order to be able to subsequently prove the fact of destruction to the competent authority.

Rectification of data

The Data Subject may indicate that the processed data is inaccurate and request for such data to be replaced. The Controller shall be responsible for the accuracy of the data, so their accuracy must be verified from time to time.

Right to restriction of processing:

The Data Subject may request the Controller to restrict the processing of their personal data, for example, in the event of an unclear, contentious situation. If the processing is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the European Union or of a Member State.

Right to data portability:

The Data Subject shall have the right to receive the personal data being processed in relation to them in a structured, commonly used and machine-readable format (e.g. .doc, .pdf, etc.) and have the right to transmit those data to another Controller without hindrance from the initial Controller. The Controller shall make it easy for data subjects to transfer their personal data from one controller to another.

Right to object

If the Data Subject has not given their consent to the processing of data, they shall have the right to object at any time to the processing of their personal data for a specific reason.

If the Data Subject wishes to exercise their rights, they shall be identified by the Controller and the Controller shall inevitably need to communicate with the Data Subject; therefore, the Data Subject shall be required to provide personal data for identification purposes, and the Data Subject's complaint about the processing shall be available in the e-mail account within the time period indicated in this Notice in relation to complaints. The Controller shall respond to complaints about the processing without delay, but within 30 days at the latest.

9. Legal remedies

The Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) (H-1055 Budapest, Falk Miksa u. 9-11.; www.naih.hu, Phone number: +36 (1) 391-1400, Fax number: +36 (1) 391-1410, E-mail: ugyfelszolgalat@naih.hu) or enforce their rights relating to the processing of personal data before the Court with subject-matter and territorial jurisdiction under Act CXXX of 2016 on the Code of Civil Procedure.

10. Final provisions

10.1. If the Controller intends to carry out further processing of personal data for purposes other than those set out in this Notice, the Controller shall inform the Data Subject of the new purpose of the processing prior to the further processing. The processing for the new purpose can only be started after that if the Data Subject consents to the processing—provided that the legal basis for the processing is consent—in addition to being informed.

10.2. This Privacy Notice shall be valid until withdrawal and applies to all processors of the Controller, their employees, their officers and persons having an agency relationship with them.

10.3. The Privacy Notice shall be reviewed annually or when Community or national legislation changes. Only the Controller shall be entitled to amend this Notice.

10.4. The Privacy Notice is available at the Controller's seat and on the Website.

This Privacy Notice is effective from 1 June 2024.

Crystal Worldwide Zrt.
represented by dr. MAGYAR Csaba, Chief Executive Officer