



**INFORMATION NOTE ON DATA PROCESSING AND PROCESS DESCRIPTION FOR DATA PROCESSING
CONNECTED TO SENDING NEWSLETTER**

Crystal WorldWide Szolgáltató Zártkörűen Működő Részvénytársaság (hereinafter “Company” or “Controller”) hereby informs you by way of this information note and process description and all facts related to processing your personal data in accordance with 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 repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: GDPR). By participating in the process, you will become the data subject of the processing according to this process description.

EXACT NAME AND CONTACT DETAILS OF THE CONTROLLER:

Controller’s name:	Crystal WorldWide Szolgáltató Zártkörűen Működő Részvénytársaság
Controller’s short name:	Crystal WorldWide Zrt.
Tax number:	26506946-2-13
Community tax number:	HU26506946
Company registration number:	13-10-041858
Data processing sites	
Registered office:	H-2161 Csomád, Verebeshegy utca 11.
Branch office:	H-1145 Budapest, Amerikai út 59.
Controller’s representative:	Dr. MAGYAR Csaba
E-contact of Controller’s representative:	csaba.magyar@crwwgroup.net

PROCESS DESCRIPTION OF THE PROCESSING:

Please be informed that you may subscribe to our newsletter service on the www.crwwgroup.net website. The Company shall inform the subscriber through newsletters about the news connected to current and future service activities, by sending him or her messages containing advertisements, information.

The Company shall regularly send the newsletter to the e-mail addresses of the subscribers to the newsletter service.

The e-mail address of the newsletter subscriber can only be recorded in the database with the data subject’s consent and specific subscription.

Please note that we shall not process any of your persona data other than your e-mail address.

The user of the relevant e-mail address may at any time directly unsubscribe of receiving the newsletter free of charge.

Should you wish to revoke the consent given to the Company for sending the newsletter (i.e. you wish to unsubscribe the newsletter by revoking your consent), you can do it by sending an electronic mail to info@crwwgroup.net, or by unsubscribing directly in the e-mail (electronic message) containing the newsletter. In this case the Company shall not send further newsletters. Please note that the revocation of the consent shall not affect the lawfulness of the data processing based on the consent before the revocation.

Upon subscribing on the website the data subject will receive a reply on the successful subscription, including receiving an electronic message. The company shall use the Mailchimp system to send the newsletter. Mailchimp is an online marketing platform operated by The Rocket Science Group LLC having its registered office in the State of Georgia, USA. Controller is participating in the Privacy



Shield framework, the data transfer is completed according to the rules of the EU-USA data protection shield, and it offers appropriate guarantees for handling personal data in the scope of data processing.

PURPOSE OF DATA PROCESSING:

Sending to the subscribers newsletters, i.e. electronic messages containing advertisements and information for the data subjects in the scope connected to the Company's field of activity.

TITLE OF DATA PROCESSING:

The data subject's consent under Article 6 (1) a) of the GDPR.

SCOPE OF THE DATA PROCESSED:

E-mail address of the data subject.

SPECIFICATION OF THE DATA PROCESSORS INVOLVED IN THE DATA PROCESSING AND THE DATA PROCESSING OPERATION:

Controller shall use data processor for the performance of the tasks.

Controller's activity: providing newsletter sending services.

IN THE COURSE OF THE PROCESSING, DATA WILL BE TRANSFERRED TO THE FOLLOWING THIRD PERSONS UNDER THE SPECIFIED TITLE:

Controller shall not transfer the data to third parties.

PERIOD OF STORING PERSONAL DATA:

Until the end of the newsletter sending service. If requested by the data subject, Controller shall delete the personal data without undue delay, but not later than within 1 month following the statement of unsubscribing – the revocation of consent – made by the data subject.

EXISTENCE OF AUTOMATED DECISION-MAKING:

No automated decision-making shall take place during the processing.

Data subject of the processing: newsletter subscriber

Method of data storage: electronic

Rights of the data subject: revocation of consent, rights to access, correction, deletion, restricting and data transferability (in the case of automated processing)

RULES ON EXERCISING THE DATA SUBJECT'S RIGHTS:

Controller hereby informs you that you may exercise the following ways to enforce rights upon the verification of your identity:

- request information on the processing of your personal data,
- request the rectification of your personal data,
- revoke your consent to data processing,
- request the deleting of your personal data, if any of the conditions under Article 17 (1) of the GDPR are met,
- request the restriction of processing your personal data,
- exercise your right to data transferability, if its conditions are met,
- seek legal remedy.



Controller will make efforts to provide you in each case with information that is as concise, transparent, easy to understand, accessible, clear and plain as possible, by also complying with the rules of the GDPR.

Your request should primarily be submitted in writing, addressed to Controller's representative at the contact details specified in this information note. Our staff member shall record the request and you shall receive a reply to your request within one month upon receiving the request. We may extend this deadline by not more than two months, provided that it is justified by the complexity of the request or the number of requests actually handled, however, we shall inform you on the extension within one month in electronic form.

If we fail to take measures upon your request, or you do not accept the measures taken, you may seek legal remedy. you may turn with complaints related to our data processing procedure to the Hungarian National Authority for Data Protection and Freedom of Information or to the regional court having jurisdiction according to your place of residence or place of stay.

Please be informed, however, that according to the practice of the Hungarian National Authority for Data Protection and Freedom of Information, your complaint will only be admitted, if you first turn to the controller, i.e. to us, but we fail to act according to your request, or you do not accept the measures taken. We recommend you to first contact the representative of the Controller!

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