

# PRIVACY STATEMENT

## 1. PURPOSE OF THIS POLICY

We at NAST Kft. (NAST Ltd.) are committed to the protection of your personal data and bear a special responsibility for the safety of your information. Our data collection and data processing activities consist of clear and transparent processes.

This statement contains answers to the following questions:

- What personal data do we collect and process about you – on the one hand, within your relationship to us as a customer, and on the other hand, in relation to the use of our website and online services?
- Where do we get this data from?
- What do we do with this data?
- How do we store this data?
- To whom do we transmit or disclose this data?
- How do we respect your rights to privacy?
- How do we comply with data protection regulations?

The collection and processing of personal data take place at all times according to the data protection laws of Hungary and the EU.

The Data Management Policy determines the rules of use and storage (hereafter collectively referred to as “data management”) of the data provided in the course of customer communication and of an eventual previous registration on the online platforms of NAST Kft. on the following websites: [smart-circle.co.uk](http://smart-circle.co.uk), [smart-circle.hu](http://smart-circle.hu), [nast.hu](http://nast.hu), [nastltd.eu](http://nastltd.eu). The processing and use of this data take place in compliance with the requirements of Law No. CXII of 2011 of Hungary on the rights to informational self-determination and information freedom, as well as Regulation 2016/679/EC, applicable from 25 May 2018 (hereafter referred to as General Data Protection Regulation).

## 2. LEGAL BASIS OF OUR DATA MANAGEMENT

The legal basis of our data management is in each and every case the consent of the person concerned, which can be given by registration on the above mentioned websites, or by accepting the Data Management Information in the course of customer communication.

## 3. PURPOSE OF OUR DATA MANAGEMENT

We at NAST Kft. manage the data provided by you exclusively for the following purposes:

### 3.1. Data

Mandatory data required for legal transactions: Name, e-mail, phone number, shipping and billing address. For purchase after registration: Name, username, e-mail, phone number, shipping and billing address.

Data management purposes relating to the above data: customer communication, order fulfillment, newsletters.

#### 4. DATA CONTROLLER

The customer's data is managed by NAST Kft. (registered office: 4. Ezred str., Budapest, 1044 Hungary, Reg. No.: 01 09 063594, Tax No.: HU10269709, represented by: Adam Tamas Stier and Zoltan Stier).

##### Contact

Postal address: 4. Ezred str., Budapest, 1044 Hungary

E-mail: [info@nast.hu](mailto:info@nast.hu)

Phone: +36 1 369 0473 during working hours: from 9:00 AM until 4:00 PM

Appointed data processors:

NAST Kft. may appoint data processors (e.g. system operators, shipping companies, accountants) in the course of fulfilling orders or settling accounts. NAST Kft. takes no responsibility for the data management practice of these third parties.

##### List of data processors:

Name: **NAST Kft**

Registered office: 4. Ezred str., Budapest, 1044 Hungary

E-mail: [info@nast.hu](mailto:info@nast.hu)

Activity: accountancy

Details of hosting provider:

Name: **IamIT Informatikai Kft.**

Registered office: Batthyany str. 1. floor 4th, door 1., Budapest, 1015 Hungary

E-mail: [info@iamit.hu](mailto:info@iamit.hu)

#### 5. DETAILS OF OUR DATA MANAGEMENT

##### What kind of personal data do we collect?

Personal data means any information about you which is suitable for identification purposes, e.g. your name, contact details, other data provided by you, as well as usage information about our website.

When you make a phone call with our colleagues, negotiate with us in person, send us a message via e-mail or a form on the above mentioned websites or by post, subscribe to a newsletter, fill out an online survey or quiz, order any of our products or services, or establish any contractual relationship with us, we may collect your personal data.

We may collect particularly the following types of data:

- Name, postal address, e-mail, phone number, or other data used for payment;
- Business data which you share with us in order for your needs to be properly fulfilled;
- Information about the usage of our website;

Any communication with us via postal letter, e-mail, phone or social media platforms.

We at NAST Kft. ensure that the data provided in the course of registration or other form of contacting us are securely managed. The data can be accessed exclusively by you, the appointed data processor, and if needed, the product supplier. In the latter case, the supplier shall get access

only to the shipping address and the payment details. Furthermore, NAST Kft. shall disclose the data provided by you if required by compliance with legal requirements or at the request of authorities, keeping you informed about this. The consent of the person concerned serves as the legal basis of data management. The management of your data starts with your registration and/or with the submission of your first order. The management of your data terminates with the data being deleted by the data processor or at your initiative (e.g. by deleting your registration).

## **6. TERM OF OUR DATA MANAGEMENT**

The management of personal data required for registration or submission of order starts when you register or provide us with the data required for the fulfillment of your order respectively, and ends with the deletion of this data upon your request. The management of optional data lasts from the moment when the data are provided until the deletion of this data upon request.

The data provided for the purpose of newsletter communication is managed until the person concerned requests this data to be deleted.

Personal data shall be deleted after submission of any deletion request. The personal data shall be deleted from the system of NAST Kft. within 5 working days following receipt of such request.

The above provisions do not affect the compliance to legal obligations to retain data (e.g. accountancy laws) or the management of data provided in the course of webshop registration or based on consent given in other ways.

## **7. COOKIES**

This website uses cookies which help improve our services and offer you useful functions.

Cookies are short text files stored on the hard disk of the website's visitors through their browser. Cookies allow the website to recognise and track the browsers of its users, so that we at NAST Kft. can offer you products and services which really suit your interests. Cookies store your contact details and data which help us identify you during your visit on our website in order to make it easier for you to use the website and eventually make a purchase. Most browsers automatically accept cookies, but if you wish, you can set up your browser to accept, decline or delete them. Most browsers give you hints in the "Help" part of the toolbox about how to stop your browser from accepting new cookies, what options to choose for getting a notification when your browser accepts a new cookie, or how to decline all cookies. If you change the default settings, some functions or features may not work properly anymore. The cookies used by NAST Kft. do not track any data stored on the user's computer.

Visit this website for further information on cookies and how to disable them: <http://www.allaboutcookies.org>.

## **8. TERMINATION OF REGISTRATION**

You have the following options for opting out of communication with NAST Kft.:

- via e-mail to the address: [info@nast.hu](mailto:info@nast.hu) or
- via regular mail to the postal address: 4. Ezred str., Budapest, 1044 Hungary

## **9. RIGHTS OF THE PERSONS CONCERNED BY OUR DATA MANAGEMENT**

### **9.1 Right to Information**

You are entitled to ask for information anytime about your personal data managed by NAST Kft.

Upon request, NAST Kft. shall inform you about your data managed by it, about your data processed by the data processor appointed by it or on its behalf, about the source of such data, about the purpose, legal basis and term of such data management, as well as about the name, address and data management activity of the data processor, about the circumstances and impacts of an eventual privacy incident and the corrective measures taken, furthermore, in case a transmission of your personal data occurs, about the legal basis and recipient of such data transmission. We at NAST Kft. shall provide the requested information within 25 days from the submission of your request.

NAST Kft. keeps a register for the purpose of monitoring the measures related to privacy incidents, which contains the scope of your personal data, the scope and number of persons affected by an eventual privacy incident, the date, circumstances and impacts of the privacy incident and the corrective measures taken, as well as other data required by the data management regulations.

If you have any questions or remarks about our data management, please contact our colleague at NAST Kft.

## **9.2 Request for deletion, correction or blocking of data**

You are entitled to:

- Ask for information about whether we hold any personal data about you, and if so, what these are, and for what purpose these are stored or processed by us.
- Request access to your personal data (commonly known as “data subject access request”). By this means you can get a copy of your personal data stored by us and make sure that we have been acting according to the regulations.
- Request the correction of your personal data held by us. This way you can correct or complete your personal information.

You are entitled to request the correction or deletion of your incorrectly recorded data anytime using any of the following contact details. NAST Kft. shall delete the data within 5 working days from receipt of your request. Please note that in this case there is no way to restore your data. If the management of such data is required by law (e.g. accountancy regulations), the data cannot be deleted but will be retained by NAST Kft. as long as it is required.

Alternatively, you can ask for your data to be blocked. NAST Kft. shall block your personal data either upon your request or if, based on the available information, it can be assumed that the deletion of such data would be contrary to your legitimate interests. Personal data blocked in this way can only be managed as long as the data management purpose precluding the deletion of such personal data exists.

You, as well as anyone else to whom the data have been transmitted for processing, shall be notified about the correction, blocking or deletion of such data. The notification may be waived, if this is not contrary to your legitimate interests with respect to the purpose of data management.

If NAST Kft. fails to fulfill the request of the person concerned for data correction, blocking or deletion, it shall give a written notice about the factual and legal reasons for the rejection within 15 days from receipt of such request.

## **9.3 Objection to management of personal data**

You are entitled to object to the management of your personal data. NAST Kft. shall investigate such objection as soon as possible, but not later than within 8 days from the submission of the request, determine if the request is justified, and inform the person concerned on its decision.

You can exercise your rights by using the contact details listed in Section 1.

#### **9.4 Pursuant to the Hungarian Law on Information Freedom and to the Hungarian Civil Code (Law V. of 2013)**

1. the person concerned may approach the National Authority for Privacy and Information Freedom (NAIH, Szilágyi Erzsébet fasor 22/c., H-1125 Budapest, Hungary; [www.naih.hu](http://www.naih.hu))  
or
2. assert their rights before a court.

If you have provided the data of a third party in the course of your registration to our services, or caused any damage in any other way, NAST Kft. is entitled to seek compensation from you. In such cases NAST Kft. shall provide any reasonable assistance for the competent authorities in order to identify the infringer.

#### **10. DATA SECURITY**

NAST Kft. undertakes to warrant for the security of your data and to take any technical measures to ensure that your recorded, stored and managed data will get adequate protection, and shall make its best efforts to prevent any loss, unauthorised use or unauthorised change of such data. Furthermore, NAST Kft. undertakes to call upon any third party to which it eventually transmits or forwards the data, to meet their respective obligations.

#### **11. MISCELLANEOUS**

NAST Kft. reserves the right to amend this Data Management Information at its own discretion. After the amendment has taken effect, you shall accept the terms of the amended Data Management Information by conduct through accessing the above mentioned websites of NAST Kft.

This Data Management Information is valid as of 07.12.2022.