Contents
Preamble .............................................................................................................................. 3
I. Contact information ..................................................................................................... 4
   Additional data processing for marketing purposes ........................................................ 7
II. Data Processing in Connection with Sending Advertising (Newsletter) ........................ 10
III. Social media ............................................................................................................ 13
IV. Processing of Data for Website Visitor Tracking ..................................................... 13
V. Data Processing of Minors........................................................................................ 14
VI. Legal Remedies ........................................................................................................ 14
VII. Modification of the Privacy Notice ......................................................................... 15
Preamble

The purpose of this Privacy Notice (hereinafter the “Notice” or the “Privacy Notice”) is to provide information on the data processing practices followed and applied by MANOOI Center Service and Trade Limited Liability Company (registered office: 1028 Budapest, Fuvola utca 21., company registration number: 01-09-871372, hereinafter the “Company” or “MANOOI”). The Company respects the privacy of the natural persons using the contents of the www.manooi.com website (hereinafter the “Website”) in any form whatsoever (be it customers, browsers, persons seeking a job, employees, etc., referred to hereinafter together as the “User(s)) and acknowledges the contents of this Privacy Notice as binding upon itself, treats all personal data confidentially and carries out all security, technical and organisational measures that ensure the security of the data.

By accepting this Privacy Notice and/or in exceptional cases by implied conduct (when applying to the info@manooi.com e-mail address from the User’s own mailing system) the User grants his or her freely given consent to the Company processing his or her personal data during the use of a Service in accordance with the provisions of this Notice and accepts same without reservation. Simultaneously with using the Service(s) the User also provides data. By granting his or her consent(s) when visiting the Website or by employing or initiating the use of the Service(s) or a part thereof, the User agrees to accept and consents to providing data to the Company and acknowledges (accepts and consents) that the freely given provision of certain personal data is required for the use of certain Services on the Website, such as direct contact or newsletter subscription. The User acknowledges that using the Service shall be deemed as consent to such data processing.

In the Notice we have underlined the parts where the application of Section 6(5) of the Privacy Act may occur.

For ease of reference and full information, the Privacy Notice is available in two versions: a complete version and a simplified, summary version.
If you have any questions please contact us by e-mail at info@manooi.com.

Data, contact details of the controller
Name: MANOOI Szolgáltató és Kereskedelmi Korlátolt Felelősségű Társaság
Company registration number: 01-09-871372

Registered office: 1028 Budapest, Fuvola utca 21
Business site: 1023 Budapest, Apostol utca 13/B

Tax number: 1375178-2-41
Email address: info@manooi.com
Telephone: +36 1 336 2690 | Fax: +36 1 336 2699

Hosting service provider Data Processor information:
Name: Pegaton Studio Kft.
registered office: 2700 Cegléd, Lajos u. 9.
Tel.: +36 70 200 7379

I. Contact information

1.) The set of personal data being processed
In order to be able to communicate with you through the website, we ask that you provide the following personal data: name (first name, family name), e-mail, telephone number. On the “Contact” surface, by providing the above data, the User consents to the recording and processing of the data.

2.) Purpose of the above data:
Identification of inquirer, communication in order to provide information in accordance with the inquirer’s needs.

3.) Legal basis of data processing:
Consent of the User pursuant to Section 5(1) a) of the Privacy Act and point (a) of Article 6(1) of the GDPR: “the data subject has
given consent to the processing of his or her personal data for one or more specific purposes”

4.) Duration of Data Processing
The Company deletes the above-described data within 30 days. If a sale and purchase agreement is concluded in connection with the communication, the processing of the above data shall be governed by clause C. 1.) of the Company’s Data Processing and Data Security Policy, of which the User shall receive specific information prior to conclusion of the contract.

We store the data concerning your for 30 days if no sale and purchase agreement is concluded in connection with the data.

5.) Rights of the Data Subject
a) Right to request information
At the request of the User the Company provides information on the User’s data processed by the Company or the data processor, their source, the purpose, legal basis, duration of the data processing, the name, address and data processing activities of the data processor, of the circumstances and impact of any data protection breach and the measures taken to address it, as well as - where personal data are transferred - of the legal basis and recipients of such data transfer.

Information is free of charge if the data subject has not submitted a request for information to the controller regarding the same area in that year. In all other cases, the Company determines a fee and shall provide information after receipt of payment of such fee.

You can request information of your data processed by us. Information is free of charge once a year.

b) Personal data rectification, data portability
At the request of the User the Company will rectify incomplete or incorrect data.

The Data Subject may request that the Company receive the personal data provided to it in a structured, commonly used and machine-readable format and may request that such data be transmitted by the Company to another controller.

You can request a correction of your incorrect data and that your data be provided to you or transmitted to the data controller designated by you.

c) Erasure or blocking of personal data
At the request of the User the Company erases the data provided when contacting us except where the sale and purchase agreement has been concluded based on such contact and the data provided during the initial contact are material elements of, and required for verifying the sale and purchase agreement, in which case pursuant to Section 6(5) of the Privacy Act the Company shall not be required to comply with the User’s request to erase the above data and may continue to process the above data without the User’s further consent: “Where personal data is recorded under the data subject’s consent, the controller shall - unless otherwise provided for by law - be able to process the data recorded where this is necessary:

- for compliance with a legal obligation pertaining to the controller, or
- for the purposes of legitimate interests pursued by the controller or by a third party, if enforcing these interests is considered proportionate to the limitation of the right for the protection of personal data.

You can request erasure of the data processed for the above purpose; if no sale agreement was concluded the Company will comply with your request for erasure.
without the data subject’s further consent, or after the data subject having withdrawn his or her consent.”

If the User’s data cannot be deleted in spite of the request, the Company will block the data concerned.

At the request of the User the Company blocks the requested data.

d) Objection to the processing of personal data

The User may object to the processing of his or her personal data. If the Company continues the data processing for reasons of a legitimate interest, the Company will consider if the data processing is necessary for the establishment, exercise or defence of legal claims. Where the Company determines that the User’s objection is substantiated it shall end the data processing - including collection of any further data and data transfer - and block the data.

You may object to the processing of your personal data. If we process your data due to a legitimate interest, we will consider complying with your request.

e) Procedures by service provider

The data subject may send his or her request pursuant to clauses 5) a)-d) in writing to the Company’s above-written addresses by e-mail or by post. The Company shall respond to the request for information within the shortest possible time, but within not more than 25 days, and rectify incorrect data or erase or block requested data and take the measures required for ensuring data portability. Within the above deadline the Company shall notify the data subject and all recipients to whom any of these data had previously been transferred for processing regarding the rectification, blocking, granting the right to portability or erasure of the data.

We will try to comply with your request as soon as possible, but within no later than 25 days.

Where the right to object is exercised:

The Company shall investigate the cause of objection within the shortest possible time inside a 15 day time period, adopt a decision as to the merits and notify the data subject in writing of its decision.

Where the Company determines that the User’s objection is substantiated it shall end the data processing - including collection of any further data and data transfer - and block the data and notify all recipients to whom any such data had previously been transferred regarding the objection and the measures adopted, upon which such recipients shall also take measures regarding the enforcement of the objection.

If you practice the right to object, we will decide on your request within 15 days and inform you of our decision.

6.) Processing of the Data

The Company stores the personal data provided by the User through the website in Hungary on the server of the above-defined Data Processor hosting service provider, and electronically as well as in hard copy at the Company’s registered office located at 1028 Budapest, Fuvola utca 21.

The data are also forwarded to the Company’s electronic mailing system. The Company’s electronic mailing system is operated by the below Application Provider Data Processor:

Name: Digitalwave Hungary Kft.
Company registration number: 01 09 705608

Data is stored in Hungary on the server of the above-defined Data Processor and on paper at the Company’s registered office and we take all measures to ensure the security of such information.

The data are also forwarded to the Company’s electronic mailing system provided by Digitalwave Hungary Kft Data Processor.
Tax number: 12832332-2-42
e-mail: hello@digitalwave.hu
Unauthorised access to the Company’s electronic mailing system is password-protected.
Data Processors and the Service Provider (controller) shall take all steps that are reasonably necessary in order for them to store the data securely and prevent unauthorised access (password, backup save, firewall, anti-virus application, locked drawer).
Only the Company will have access to the data, which shall be processed solely by the employees of the Company for communication purposes.

Our Company will not provide the User’s data to third parties, except:-
- In the unlikely event that the Company is transformed, e.g. by merging with another company or another company de-merges from the controller, the legal successor company may take over the personal data processed by the controller, however, it shall be obligated to process the data under the same conditions as does the present controller in accordance with this Privacy Notice.

Data transfer is necessary for compliance with the Company’s a legal obligation to which the controller is subject (GDPR point (c) of Article 6(1))

By sending the above data on the “Contact” surface, the User also acknowledges and accepts transfer of the data as per the above.

Additional data processing for marketing purposes
The Company shall continue to process the data provided in clause 1, if the User consents to such processing. Consent is granted by marking (ticking) the applicable checkbox which shall also be deemed as consent to the additional data processing hereunder.
Consent to the additional data processing shall not be a condition for using any other service on the website by the User.

2.) Purpose of Data Processing
Information of the User by telephone or e-mail of the current promotions, discounts granted to the User, or of new services.

3.) Legal Basis of Data Processing:
Data processing is based solely on the User’s consent.
The statutory basis of the data processing is Section 5(1) a) of the Privacy Act and point (a) of Article 6 (1) of the GDPR: “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”

4.) Duration of Data Processing
Your data will be handled under the same terms and conditions in the event of any reorganisation.

We store the data concerning your for 30 days if no sale and purchase agreement is concluded in connection with the data.

If you consent, we will send you advertisements to the email address provided by you and we will contact you by phone for marketing purposes.

4.) Duration of Data Processing
The Company processes the personal data processed for the purpose and on the legal basis under this clause until withdrawal of the consent. The declaration of consent can be withdrawn at any time without limitations or justification. If the User does not request erasure of his or her data, we process such personal data for 8 years. If the further processing of personal data is allowed by law, the Company will inform the User thereof separately.

5) Rights of the Data Subject

a) Right to request information
At the request of the User the Company provides information on the User’s data processed by the Company or the data processor, their source, the purpose, legal basis, duration of the data processing, the name, address and data processing activities of the data processor, of the circumstances and impact of any data protection breach and the measures taken to address it, as well as - where personal data are transferred - of the legal basis and recipients of such data transfer.
Information is free of charge if the data subject has not submitted a request for information to the controller regarding the same area in that year. In all other cases, the Company determines a fee and shall provide information after receipt of payment of such fee.

b) Personal data rectification, data portability
At the request of the User the Company will rectify incomplete or incorrect data. The Data Subject may request that the Company receive the personal data provided to it in a structured, commonly used and machine-readable format and may request that such data be transmitted by the Company to another controller.

You can request information of your data processed by us. Information is free of charge once a year.

You can request a correction of your incorrect data and that your data be provided to you or transmitted to the data controller designated by you.

You can request erasure and blocking of the data processed for the above purpose.

You can object to data processing performed for the above purpose.

We will try to comply with your request as soon as possible, but within no later than 25 days.

5) Rights of the Data Subject

You can request information of your data processed by us. Information is free of charge once a year.

You can request a correction of your incorrect data and that your data be provided to you or transmitted to the data controller designated by you.

You can request erasure and blocking of the data processed for the above purpose.

You can object to data processing performed for the above purpose.

Where the right to object is exercised:
The Company shall investigate the cause of objection within the shortest possible time inside a 15 day time period, adopt a decision as to the merits and notify the data subject in writing of its decision.

Where the Company determines that the User’s objection is substantiated it shall end the data processing - including collection of any further data and data transfer - and block the data and notify all recipients to whom any such data had previously been transferred regarding the objection and the measures adopted, upon which such recipients shall also take measures regarding the enforcement of the objection.

6.) Processing of the Data
The Company stores the above-defined data in Hungary on the server of the above-defined Data Processor hosting service provider, as well as in hard copy on paper at the Company’s registered office located at 1028 Budapest, Fuvola utca 21 or its business site at 1023 Budapest, Apostol utca 13/B.

The data are also forwarded to the Company’s electronic mailing system. The Company’s electronic mailing system is operated by the below Application Provider Data Processor:
Name: Digitalwave Hungary Kft.
Company registration number: 01 09 705608
Tax number: 12832332-2-42
e-mail: hello@digitalwave.hu

Unauthorised access to the Company’s electronic mailing system is password-protected.

Data Processors and the Service Provider (controller) shall take all steps that are reasonably necessary in order for them to store the data securely and prevent unauthorised access (backup save, firewall, anti-virus application, locked drawer).

Only the Company will have access to the data, which shall be processed solely by the employees of the Company for providing information or sending out advertising material.

Our Company will not provide the User’s data to third parties, except:-
- In the event that the controller is transformed, e.g. by merging with another company or another company de-merges from the controller, the legal successor company may take over the personal data processed by the controller, however, it shall be obligated to process the data under the same conditions as does the present controller in accordance with this Privacy Notice.

Data transfer is necessary for compliance with the Company’s a legal obligation to which the controller is subject (GDPR point (c) of Article 6(1))

If you practice the right to object, we will decide on your request within 15 days and inform you of our decision.

Data is stored in Hungary on the server of the above-defined Data Processor, electronically and on paper at the Company’s registered office or site and we shall take all measures to ensure the security of such information.

The data are also forwarded to the Company’s electronic mailing system provided by Digitalwave Hungary Kft Data Processor.

Your data will be handled under the same terms and conditions in the event of any reorganisation.
II. Data Processing in Connection with Sending Advertising (Newsletter)

1.) The Set of Personal Data Being Processed
In order to learn of current promotions or new services quickly, the User may subscribe to the Company’s newsletter. Subscription is done by marking (ticking) the applicable checkbox which shall also be deemed as consent to the data processing under this Notice. We ask that User’s provide the following personal data: User’s name, e-mail address. Providing and processing the data is not mandatory and is based solely on the User’s consent. Subscription to the newsletter shall not be a condition for using any other service on the website by the User.

Types of data being processed: User’s name, e-mail address.

2.) Purpose of Data Processing
Information of the User by e-mail of the current promotions, discounts granted to the User, or of new services.

If you consent, we will send you advertisements to the email address provided by you.

3.) Legal Basis of Data Processing:
Data processing is based solely on the User’s consent. The statutory basis of the data processing is Section 5(1) a) of the Privacy Act and point (a) of Article 6 (1) of the GDPR: “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”

We process the data concerning you on the basis of your consent.

4.) Duration of Data Processing
The Company processes the personal data processed for the purpose and on the legal basis under this clause until withdrawal of the consent. The declaration of consent can be withdrawn at any time without limitations or justification. If the User does not request erasure of his or her data, we process such personal data for 8 years. If the further processing of personal data is allowed by law, the Company will inform the User thereof separately.

We process the data concerning you until withdrawal of consent, but for no more than 8 years.

5) Rights of the Data Subject

a) Right to request information
At the request of the User the Company provides information on the User’s data processed by the Company or the data processor, their source, the purpose, legal basis, duration of the data processing, the name, address and data processing activities of the data processor, of the circumstances and impact of any data protection breach and the measures taken to address it, as well as - where personal data are transferred - of the legal basis and recipients of such data transfer.

Information is free of charge if the data subject has not submitted a request for information to the controller regarding the same area.

You can request information of your data processed by us. Information is free of charge once a year.
in that year. In all other cases, the Company determines a fee and shall provide information after receipt of payment of such fee.

b) Personal data rectification, data portability
At the request of the User the Company will rectify incomplete or incorrect data. The Data Subject may request that the Company receive the personal data provided to it in a structured, commonly used and machine-readable format and may request that such data be transmitted by the Company to another controller.

c) Erasure and blocking of personal data
At the request of the User the Company will erase or block the data provided when subscribing to the newsletter.

d) Objection to the processing of personal data
The User may object to the processing of his or her personal data. If the User’s objection is substantiated the Company shall end the data processing - including collection of any further data and data transfer - and block the data.

e) Procedures by service provider
The data subject may send his or her request pursuant to clauses 5) a)-d) in writing to the Company’s above-written addresses by e-mail or by post. The Company shall respond to the request for information within the shortest possible time, but within not more than 25 days, and rectify incorrect data or erase or block requested data and take the measures required for ensuring data portability. Within the above deadline the Company shall notify the data subject and all recipients to whom any of these data had previously been transferred for processing regarding the rectification, blocking, granting the right to portability or erasure of the data.

Where the right to object is exercised:
The Company shall investigate the cause of objection within the shortest possible time inside a 15 day time period, adopt a decision as to the merits and notify the data subject in writing of its decision.

Where the Company determines that the User’s objection is substantiated it shall end the data processing - including collection of any further data and data transfer - and block the data and notify all recipients to whom any such data had previously been transferred regarding the objection and the measures adopted, upon which such recipients shall also take measures regarding the enforcement of the objection.

6.) Processing of the Data
The Company stores the above-defined data in Hungary on the server of the above-defined Data Processor hosting service provider, as well as in hard copy on paper at the Company’s registered office located at 1028 Budapest, Fuvola utca 21 or its business site at 1023 Budapest, Apostol utca 13/B.

The data are also forwarded to the Company’s electronic mailing system. The Company’s electronic mailing system is operated by the below Application Provider Data Processor:

Name: Digitalwave Hungary Kft.
Company registration number: 01 09 705608
Tax number: 12832332-2-42
e-mail: hello@digitalwave.hu
Unauthorised access to the Company’s electronic mailing system is password-protected.
Data Processors and the Service Provider (controller) shall take all steps that are reasonably necessary in order for them to store the data securely and prevent unauthorised access (backup save, firewall, anti-virus application, locked drawer).

Only the Company will have access to the data, which shall be processed solely by the employees of the Company for providing information or sending out advertising material.

Our Company will not provide the User’s data to third parties, except:
- In the event that the controller is transformed, e.g. by merging with another company or another company de-merges from the controller, the legal successor company may take over the personal data processed by the controller, however, it shall be obligated to process the data under the same conditions as does the present controller in accordance with this Privacy Notice.

Data transfer is necessary for compliance with the Company’s a legal obligation to which the controller is subject (GDPR point (c) of Article 6(1))

By signing up on the „Join manooi’s Newsletter” surface, the User also acknowledges and accepts processing and transfer of the data as per the above.
The Company makes sure that Users can unsubscribe from the newsletter both by e-mail and on the Website.

Your data will be handled under the same terms and conditions in the event of any reorganisation.

By subscribing to the newsletter you accept both the processing and the transfer of data pursuant to this clause. You can unsubscribe from the newsletter through the Website, or by e-mail.
III. Social Media

Our Company operates the Manooi Light Creations Facebook profile, for Facebook’s Data Policy please visit [https://www.facebook.com/privacy/explanation](https://www.facebook.com/privacy/explanation)

1. The fact of the data collection, set of data being processed: Your registered name on Facebook social media pages and the public profile picture of the User.
2. Date subjects concerned: All data subjects who register on our Facebook social media pages and “like” the website or share a post from it.
3. Purpose of data collection: sharing, liking, promoting certain contents of the website, its products, promotions or the website itself on social media pages.
4. Duration of data processing, deadline for erasure of data, identity of the potential data controllers with right of access and the rights of data subjects relating to data processing: Data subjects can obtain information regarding the source of the data, their processing, the mode and legal basis of the transfer from the social media page at the above contact details. The data processing takes place on the social media sites, therefore, the rules of the given social media site are applicable to the duration and mode of the data processing, as well as the possibilities for erasure and modification of data.
5. Legal basis of the data processing: freely given consent of the data subject to the processing of their personal data on social media sites.

IV. Processing of Data for Website Visitor Tracking

**Placement and purpose of cookies and "web beacons"**

When using the controller’s website, the controller places small data files that also contain data that cannot be directly linked to the user (cookies) on the user’s computer for the purposes below:

- data recording;
- identification of the User;
- facilitating future visits by the User;
- increasing efficiency of the service;
- sending targeted advertisements or other targeted content to the User, or for market research.

The controller does not link the data it obtains as a result of the use of the data files to the identification data of the user concerned. So-called session cookies will be automatically deleted after expiry of the deadline included in the cookie.

The User has the following options in his/her browser in respect of cookies:

- the User gets a notice that the controller wishes to place a cookie on his or her computer
- the User may prohibit sending of cookies at any time

The Company is also present on Facebook. Facebook’s Data Policy applies to data processing on Facebook.
In this respect we emphasise that not accepting cookies will result in inadequate operation of certain pages or functions and the user may not be authorised to access certain data. For more information on cookies please visit http://www.cookiecentral.com.

In addition to the cookies placed on the user’s computer by the controller, third parties may also install data files on the user’s computer, for example where the user visits another web page within the framework of the controller’s website.

For the above purposes, the controller may insert a web beacon (in other words, a web bug) from a third party in its website. A web beacon is an image embedded in a web page, with the help of which visits to the website can be monitored. This information is also called “clickstream data”. This data helps to analyse visit habits, which are necessary for improving the quality of the website or in connection with displaying advertisements. In terms of function web beacons are similar to cookies, they are used for tracking online movements of users. The main difference between the two is that web beacons are not visible on the page. At the same time, (as opposed to cookies) users are unable to prohibit the installation of web bugs in their browser. For more information on web beacons please see http://en.wikipedia.org/wiki/Web_beacon

In addition to the above, for the adequate operation of the Service and for purposes of learning user visit data on the website as well as the interests of users, the controller uses the Google Analytics measurement system. The controller does not link the data thus obtained to any other data on the basis of which the user can be identified.

V. Data Processing of Minors

The Company does not contract with persons under the age of 18, nor is subscribing to the newsletter allowed for people under the age of 18. We ask and recommend that only persons over the age of 18 use the Website and the Services. If the user provides the data of a third person under the age of 18, we will delete such data upon the verifiable, true notice of the minor’s legal guardian.

We pay special attention to the personality rights of minors, therefore, if data regarding any minors is entered in our records, such data will be blocked following notification and deleted as soon as practicable.

VI. Legal Remedies

In the event of any infringement of his or her rights, the data subject may turn to court against the Company as the controller. The court shall hear such cases in priority proceedings. The Company shall compensate any damage caused to others as a result of unlawful processing of the data subject’s data or by any breach of technical data protection requirements. The Company may be exempted from liability if the damage was caused by

If you feel that we have violated your rights in and to your personal data, you can turn to court or the Hungarian National Authority for Data Protection and Freedom of Information.
unavoidable reasons outside the range of data processing. No compensation shall be paid where the damage was caused by intentional or serious negligent conduct on the part of the aggrieved party.

Where the User provided the data of a third person for using the service or caused any form of damage during use of the websites, the Company shall be entitled to claim damages from the user. In such case the Company does everything within its power to assist the acting authorities in establishing the identity of the person infringing the rules.

Complaints related to data processing can be lodged with the court or with the Hungarian National Authority for Data Protection and Freedom of Information:
Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
Mailing address: 1534 Budapest Pf. 834
Telefon: +36-1/391-1400
Telefax: +36-1/391-1410
E-mail: ugyfelszolgalat@naih.hu

**Where the right to object is exercised:**
If you disagree with our decision adopted in relation to the objection against the data processing, or if we have missed the 15 day deadline, you may turn to court within 30 days of receipt of notice of the decision or the last day of the deadline.

**VII. Modification of the Privacy Notice**

The Company reserves the right to modify this Privacy Notice as necessary, e.g. for legal reasons or due to changes that occur within our services. In such case, the Privacy Notice will be updated on the website.

The Privacy Notice shall enter into force on the 30th day following the update.

Thereafter, the website can only be used and you will only be able to subscribe to the newsletter after acceptance of the updated Privacy Notice.

Please click [here](#) for more information on our data processing.