

## Data Protection Statement

### 1, Introduction

It is very important for us to comply with the current data protection regulations and laws, so below we present in detail the data protection steps of the site of euroring.hu and Racetrack Kft., and the processes related to data collection. The data is handled by Racetrack Kft. and this company is responsible for the handling of personal data.

#### Data for contact:

The whole legal name: RACETRACK Kft.

Email address: [office@euroring.hu](mailto:office@euroring.hu)

Postal address: 2377 Örkény Pf. 14

### 2, What personal information do we handle and for what reason?

Personal data is one that clearly allows an individual to be accurately identified. We handle the following personal data on euroring.hu, with the exact legal basis.

#### Communication data

This includes any message you send to us through the Website, emails, social media messages, or any forms of communication. We process and retain this information so that we can fulfill your orders and provide a basis for decisions in the event of legal claims. Our legal basis for processing is the user's demonstrable interest in our activity, which is reflected in the messages addressed to us.

#### Sales data

This includes all information related to the purchase of products and services, such as the customer's name, shipping and billing address, email address, telephone number, details of the product purchased. We process this information in order to successfully complete your orders and to have legally correct records of your purchases. The legal basis for storing the data is the fulfillment of the contract concluded with the order between the customer and Racetrack Kft.

#### User data

This includes data generated during the use of the website that allows the technical operation of the site, to keep the site secure, to store backups of user's activities, and to always have access to the most relevant contents possible. The legal basis for the processing of data is the user's clear interest in our activities, which is necessary for the provision and technical operation of the site and their storage.

## **Technical data**

This includes information generated during the use of the page, such as IP address, login information, browser information, time, each page was visited, page views and navigation paths, number and time of the pages were visited, time zones, and device information used in order to view the page.

The source of the data is our analytical software.

We process this data to analyze user habits on the site, to keep our site secure, and to understand the usefulness of our marketing decisions. The legal basis for processing the data is the user's clear interest in our business, which allows us to process this data in accordance with security requirements and use it to grow our business to operate more efficiently.

## **Marketing data**

It includes the visitors' preferences and what marketing content they welcome from us. We process this information to allow them to participate in sweepstakes and to send advertisements related to our products / services that the users have already expressed their interest in.

The legal basis for processing the data is the clear interest of the user in our business, which allows us to process this data in accordance with security requirements and use it to grow our business more efficiently.

We may occasionally use the information we collect for purposes such as providing targeted, relevant ads on the Facebook platform and various dynamic ad slots, and to measure the effective performance of the ads. The legal basis for processing the data is the clear interest of the user in our business, which allows us to process this data in accordance with security requirements and use it to grow our business more efficiently.

In the course of our activities, we do not collect any kind of sensitive data such as ethnicity, religious beliefs, sex life and orientation, political opinions and union membership, or health background, and genetic or biometric information.

## **3, How do we collect data?**

We may collect personal information in a way that the user provides to us directly (for example, by placing an order or sending a message). In addition, certain information is collected automatically when you use the site, for example through the so-called cookies and other similar technologies. This will only take effect after the user has given their consent.

Please see our Cookie Statement for more information.

We accept certain data from sending partners, such as analytics providers such as Google (a non-EU partner), advertising networks such as Facebook (a non-EU partner), and payment partners such as PayPal (a non-EU partner) and Barion.

#### **4, Our practical steps on the basis of data protection**

The protection of users' data and compliance with the regulations in force is extremely important for Racetrack Kft. Therefore, following a data protection impact assessment on the site, we have compiled a list of the data collected, their necessity and legal basis, and their legal compliance.

To protect the data entered on the forms and generated on the site, we use SSL certification throughout the website (as Let's Encrypt Authority X3 certification).

To protect the site from attack, we use a premium security software (as iThemes Security Pro) to protect the stored data against the so-called "brute force" and virus attacks.

Purchase and user data are stored in encrypted form (pseudonimated) in the database of the site, so they cannot be read by third parties.

In this Privacy Statement, we provide users with forms to request information about the processing of their personal information, and to modify or delete their personal information through forms. Sometimes it is necessary to provide data to our service partners (such as a courier company, courier company, newsletter software) in the interests of our business. In such a case, we will always choose to comply with the requirements of the GDPR Regulation and, in the case of US-based partners, participate in the EU-US Privacy Shield Privacy Initiative and sign a data management agreement with them to ensure that the data is handled responsibly.

#### **5, Marketing communication**

Continuing marketing communication is essential to the operation of your business. The legal basis for this data processing is to show interest in our services or the express consent of users. In accordance with the Privacy and Electronic Communications Regulations (PECR) of the European Union, we send marketing messages to our users if they have purchased from us or have expressly consented to the receipt of marketing transactions. We will allow you to suspend your consent and unsubscribe from messages in any case. There is a link to unsubscribe at the bottom of each email, or you can request removal from the database at XY email. You can also send messages when you unsubscribe from marketing communications, but only to fulfill your orders.

#### **6, Note on personal information**

It is sometimes necessary to share certain personal information with certain of our partners in order to maintain normal business operations:

- IT service providers and computer systems troubleshooting and maintenance service providers,
- expert partners such as lawyers, accountants, bankers, insurers,
- government agencies that report on our activities,
- payment service providers who securely handle credit card information,
- courier services who fulfill incoming orders to the specified shipping address.

International data transfers

We sometimes need to share user data with service providers outside the European Economic Area (EEA) in order to maintain our business. In many cases, non-EEA countries do not provide the same level of data protection, so European laws prohibit the export of data unless the appropriate conditions are met. Whenever personal information is transferred outside the EGT, we will take the following steps in addition to those discussed in Section 4 to ensure that the information is handled securely.

- We only transfer data to countries that the European Commission deems appropriate for data security purposes.
- We only use US-based services that are part of the EU-US Privacy Shield.

If the above is not met, users will be required to give their express consent to the data transfer. Consent may be revoked at any time.

Links to external sites

This page occasionally contains links to external pages, or snippets of code embedded in the page that make external services work. Clicking on these links or using embedded solutions may allow external partners to collect data about users. While we make every effort to properly review our partners, we have no control over their privacy policies and are not responsible for their privacy practices.

## **7, Duration of data management**

We only store user data for as long as our legal / accounting / reporting obligations make it mandatory or necessary for the operation of the service. When deciding on the duration of storage, we consider the amount, nature and sensitivity of the data and the potential impact of the leak in the event of a privacy incident. For tax reasons, we are required to retain customer billing and purchase information for at least 8 years in order to comply with our legal obligations. Under certain circumstances, we may use the data in an anonymized forum for statistical purposes, in which case we store the data indefinitely without information.

## **8, Visitor's rights**

As a citizen of the European Union, the General Data Protection Regulation (GDPR) grants users the following rights:

a, access to personal data

Users of the Site have the right to request a copy of the personal information stored by XY. The request will generally be processed free of charge within 14 days of the request. In the event of a repeated, abusive, unreasonable request for data, XY may charge a branded amount to provide the data and additional time may be required to provide the data. Furthermore, Racetrack Kft. requires proof of identity before releasing the data to prevent misuse.

### **Send a data request**

b, modification of personal data

In the event that personal data has been modified or entered incorrectly, users have the right to request that the data be modified. To change your personal data, please contact us at [office@euroring.hu](mailto:office@euroring.hu).

c, request the deletion of personal data

Users have the right to request the deletion of all their personal data. The request will be fulfilled free of charge within 14 days of the request. After deleting personal data, the user account will not be available, so any purchased materials will become inaccessible, as the personal data associated with the user account is essential to access the service. Racetrack Kft. requires proof of identity before deleting personal data in order to prevent misuse.

d, requesting the processing or restriction of personal data

Users have the right to restrict the disclosure of their data to third parties (service partners) upon request. The service partners to be restricted may also be named in the submission line of the request. It is important to note that cooperation with certain service providers is essential for the operation of the site (e.g. Barion as a payment service provider), so if they are restricted, the services on the site will be unavailable to the user.

Racetrack Ltd. requires proof of identity before restricting the transfer of personal information in order to prevent misuse. To restrict the transfer of personal information, please use the contact form above. In Hungary, the official body dealing with data protection is the National Data Protection and Freedom of Information Authority (NAIH). Users can find out more about their privacy rights on the NAIH website.

National Data Protection and Freedom of Information Authority,  
1125 Budapest, Szilágyi Erzsébet fasor 22/C,  
Mailing address: 1530 Budapest, Pf.:5  
Tel.: 0613911400  
Fax: 0613911410  
Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Web: <http://www.naih.hu>

## **9, Anonymize data and cookies**

Euroring.hu uses so-called cookies and similar technologies in its e-mail messages and advertisements, such as tracking codes, remarketing tags, pixels, which are activated after the user's consent. These technologies help us better understand the behavior and interests of our users, thus helping us to operate at a higher standard and more efficiently. Our goal is to make the use of euroring.hu as user-friendly and personal as possible. If the user wishes to prevent these technologies from recording non-personal information, this can be done in the following ways: by using cookie warnings on the website, by disabling them or by blocking cookies in the browser. You can find more information about the additional cookies and tracking codes on euroring.hu in our Cookie Statement.