

Privacy Policy

Data Manager information:

Data Manager: **Kosher Energy Drink Zrt.**

Address: **Hungary, H-1025 Budapest, Törökvész u.123/B.**

VAT number: **26110556-2-41**

Registration number: **Cg. 01 10 049453**

Postal address: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Email: **kosher@kosherenergydrink.com**

Telephone: **+36302702151**

Kosher Energy Drink Zrt. (Hereinafter referred to as "Seller", "Data Manager") as a Data Manager declares that the data handling of the web shop / page operated by it is in compliance with the provisions of the current law. When handling user data, we take into account and enforce the following applicable laws.

- The 1992 Law on the Protection of Personal Data and the Publicity of Public Data LXIII. Law;
- Protection of Individuals in the Processing of Personal Data in Machine Processing in 1998 VI. law;
- Act CVIII of 2001, the Act on Electronic Commerce Services;
- Act C of 2003 on electronic communications;
- Act CXII of 2011 on Right to Information Self-determination and Freedom of Information

The purpose of this Privacy Statement is to set forth the principles and rules for handling personal data and other information that are made available on the order of a product ordered from **www.kosherenergydrink.com** and affiliated to the web site operator (Data Manager).

The scope of this Declaration applies only to the information provided to the Data Controller for the use of the Site, and its provisions do not apply in the case where one of you voluntarily disclose your personal information or part of it on the site or through the site.

When ordering products distributed by **www.kosherenergydrink.com**, you may also provide data that may be included in the Privacy Act LXIII of 1992 on the Protection of Personal Data and Publicity of Public Data. are treated as personal data by law, so that they are governed by the provisions of this law.

Any personal data shall be deemed to be any data attributable to any identified (identified or identifiable) natural person (hereinafter referred to as "Affected"), the Conclusion on the Conclusion from the Data. Personal data will retain this quality while processing your data as long as your connection can be restored with the affected person. In particular, a person can be identified if it can

be identified, directly or indirectly, by the name, identifier, or one or more physical, physiological, mental, economic, cultural or social identity of a person. [2011th CXII. law]

Only the name and e-mail address can be considered as personal data (such as name and e-mail address) as personal data.

THE LEGAL BASIS OF DATA MANAGEMENT

User's voluntary consent to use the internet store or the personal information provided by using Infotv. Articles 5 (1) and 2001 CVIII. Act 13 / A (3).

OBJECTIVE OF DATA MANAGEMENT

The purpose of data management is to facilitate communication with users, where appropriate providing personalized services for each service and delivering the ordered product.

CONTRIBUTION TO DATA MANAGEMENT

Upon order, the user agrees that the data controller will handle the mandatory information of **Kosher Energy Drink Zrt.**

Scope of managed data:

- Name: Contact us, invoice exhibition, order reconciliation
- Address: Contacting, invoicing, delivery,
- Email address: contact, delivery notification;
- Phone number: contact, delivery note
- Date of purchase / registration: Technical operation;

Concepts

personal data: any data attributable to any identified (identified or identifiable) natural person (hereinafter referred to as "Affected"), a deduction from the data concerning the Affected Person. Personal data will retain this quality while processing your data as long as your connection can be restored with the affected person. A person may in particular be considered identifiable if he or she can be identified, directly or indirectly, by a name, identifier or one or more physical, physiological, mental, economic, cultural or social identity;

special data: racial origin, membership of a national and ethnic minority, political opinion or party affiliation, religious or other beliefs, membership of an interest representation organization, state of health, abnormal passion, sexual life, and criminal personal data;

contribution: a voluntary and definitive statement of the wishes of the Person that is based on appropriate information and with which he or she gives his / her unambiguous consent to the handling of his / her personal data, covering all or part of the operation;

protest: a Statement by the Person with whom he or she is objecting to the handling of his / her personal data and requesting the termination of data processing or the processing of the processed data;

"data controller": means a natural or legal person or an organization that does not have legal personality who or which determines the purpose of the processing of data, makes and executes decisions on data handling (including the equipment used) or performs with the data processor entrusted to it;

data management: irrespective of the method used, any operation or all of the operations, such as collecting, capturing, capturing, storing, storing, modifying, utilizing, transmitting, rendering, aligning, linking, blocking, deleting and destroying any of the operations, to prevent further use. Data processing means making photographs, sound or images, and recording physical features (such as finger or palm prints, DNA samples, iris images) for identifying a person;

transfer of data: where the data is made available to a specific third party;

Disclosure: if the data is made available to anyone;

data deletion: making data unrecognizable in such a way that their recovery is no longer possible;

data encryption: to make the transmission, access, disclosure, modification, alteration, destruction, deletion, interconnection, or harmonization and use of data permanently or for a specified period of time impossible;

data destruction: complete physical destruction of the data or the media containing it;

data processing: perform technical tasks related to data management operations, irrespective of the method and device used to implement the operations and the location of the application;

personal data record system (record system): any structured, functionally or geographically centralized, decentralized or scattered personal data of personal data accessible on the basis of defined criteria;

data file: all data processed in a single registry system;

third party: a natural or legal person or a non-legal entity which is not the same as the Affiliate, the data controller or the data processor;

Legal basis for data handling:

Personal data can be legally handled:

- If you consent to your personal data being handled;
- To be ordered for public interest purposes;

Order-related information on ordering:

Legal status of order management related to the order:

The legal background of the data management is based on Act CXII of 2011 on Information Self-determination and Freedom of Information. Act (Infotv.)

Legal Basis for Data Order Management:

The legal basis for data handling is the voluntary consent of the user to use the personal information provided during the use of the webshop and to use Infotv. Article 5 (1) and the 2001 CVIII. Law 13 / A. § (3).

The purpose of data order management is to:

The purpose of Data Management is to facilitate the communication with the users only, where appropriate, the provision of personalized services for certain services and the delivery of the ordered product.

Scope of managed data:

- Name: contact us, invoice exhibition, order reconciliation
- Address: contacting, invoicing, delivery,
- E-mail: contact, contact, delivery notification;
- Phone number: contact, delivery note

Duration of the order handling of the order:

The Data Manager is the data

- withdrawal of the contribution;

Billing data management information

Legislative background of billing data management:

The provisions of Act C of 2000 on Accounting (Law on Accounting) and the legal background of data management are laid down in Act CXII of 2011 on Information Freedom of Information Act and Freedom of Information. Act (Infotv.)

The legal basis for data handling related to billing:

The legal basis for data handling is the voluntary consent of the user to use the personal information provided during the use of the webshop and to use Infotv. Article 5 (1) and the 2001 CVIII. Law 13 / A. § (3).

The purpose of billing is to:

The (1) - (2) of Section 169 of the Hungarian Civil Code, compliance with the obligation to keep accounting records directly and indirectly supporting the accounting account.

Data related to billing:

- Name
- Address
- VAT number (for a company)

The data controller stores the buyer's data only for the performance of the contract and subsequent proof of the terms of the contract during the term of the contract.

Duration of billing management:

The Data Controller shall keep the data of the Affected for at least eight years pursuant to Section 169 of Act C of 2000 C.

Shipping related data management information

Legislative background of data-management related to transport: The legal background of data management is based on Act CXII of 2011 on Information Self-determination and Freedom of Information. Act (Infotv.)

Legal basis for data-handling related to transport:

The legal basis for data handling is the voluntary consent of the user to use the personal information provided during the use of the webshop and to use Infotv. Article 5 (1) and the 2001 CVIII. Law 13 / A. § (3).

The purpose of transport data management is to:

Home delivery of the ordered item or notice of the delivery time.

Data related to transport:

- Name
- Address
- Email
- Phone

Duration of data handling:**The Data Manager is the data**

- handles its contribution until the withdrawal of its contribution

The scope of the data managed for registration:

- Name: contact us, invoice exhibition, order reconciliation
- Address: contacting, invoicing, delivery,
- E-mail: contact, delivery notification;
- Phone: contact, delivery note

Duration of data handling related to registration:**The Data Manager is the data**

- withdrawal of the contribution;

Cookies

During the use of the Site, the Operator installs data files (cookies) that contain small data that can not be directly communicated with the user to the user's computer data record, user identification, to facilitate further user visits. The data entered to the Data Manager during the use of the data files is not transferred by the Data Manager to the data of the respective User.

When using the webshop, the Data Handler records and handles the following information for the Affiliate:

- the IP address used by the User;
- browser type;
- features of the operating system of the device used for browsing;
- the date of the visit;
- the pages visited;

Cookie treatment legal background:

Data management related to cookies is governed by Act CXII of 2011 on Information Self-determination and Freedom of Information. (Infotv.) and the CVIII of 2001 on certain aspects of information society services. Act on certain aspects of information society services. The legal basis for data processing is Infotv. Pursuant to Section 5 (1) (a) of the Customer's consent.

Cookie setting:

For most browsers, the Subject has the option of setting up cookies. The browser automatically accepts cookies by default, but they can usually be changed to prevent automatic acceptance and always offer the option of whether or not to allow cookies.

Cookies are intended to facilitate or allow usability and processes of webshop, limiting or deleting cookies, and may result in the User being unable to use or use the feature in a limited way.

For the most popular browsers' cookie settings, visit the following links:

- Google Chrome
- Firefox
- Internet Explorer 11
- Internet Explorer 10
- Safari

The main features of the cookies used by the website are:

"Persistent cookies" are also stored on your computer, notebook, or mobile device after leaving the web store. Using these cookies, the site recognizes the User as a returning visitor. Not suitable for personal identification

"Session cookies" are stored temporarily by the computer, notebook, or mobile device until the user leaves the web site. These cookies are listed in the webshop during a visit. These cookies are automatically deleted from your computer, notebook or mobile device when you finish your work or close your browser.

Google Analytics: Google Analytics is a Google Analytics tool that helps website and app owners to get a better picture of their visitors' activities. The service may use cookies to collect information and report on the statistics about the use of the site without individually identifying visitors to Google. The main cookie used by Google Analytics is the cookie.

In addition to reports from site usage statistics, Google Analytics can be used together with some of the advertising cookies described above to display more relevant ads in Google services (such as Google Search) and across the Internet, as well as measuring we interactions with display ads. Learn more about Analytics's cookies and privacy.

Google Adwords Cookie: Cookies are also used to make ads more attractive to users, and to publishers and advertisers more valuable. Some common ways to use cookies: Select ads based on what's relevant for that user, improve campaign performance reports, and avoid displaying ads that are already being viewed by the user.

Google Cookies, such as NID and SID cookies, are used to customize Google ads in Google products such as Google Search. For example, use such cookies to remember recent user searches, past advertisements for advertisers, or past interactions with search results, as well as visits to advertiser sites. This helps us display customized ads on Google.

If the user does not accept cookies, certain features will not be available to him. For more information about deleting cookies, see the links below:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

The Operator does not need a user's consent when using the following cookie:

- A cookie used for a password-protected session;
- A cookie for a shopping cart;
- Safety cooker;

You can set up a user in your browser to notify you if the Operator wants to place cookies on your computer or prohibit the sending of cookies at any time.

Users are warned that some sites or features may not work correctly with cookies, and the user may not be granted access to certain data.

The user has the option of deleting cookies in the Tools / Preferences menu, usually under the Privacy menu item.

The cookies used on this site are not in themselves suitable for identifying the user.

Social media:

The Data Manager maintains social media pages to promote and promote the products of the webshop (Facebook / Instagram / Twitter st.). If the User has "spotted" or contacted our web site through a social network, he or she may treat the following personal information of the user: a registered user name and a public image of the user.

Users are subject to the privacy terms of the particular social media. When publishing an illegal, offensive content, a Data Manager may exclude the User without prior notice. The legal basis for data handling is the User's voluntary contribution to personal data management on social networking sites.

Data processors' data and data management activities

Data processor storing personal information:

Data Manager: **Kosher Energy Drink Zrt.**

Address: **Hungary, H-1025 Budapest, Törökvész u.123/B.**

VAT number: **26110556-2-41**

Registration number: **Cg. 01 10 049453**

Postal address: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Location of data processing: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Email: **kosher@kosherenergydrink.com**

Telephone: **+36302702151**

The data processor performs tasks specified in the written contract with the data controller, and does not have the right to know personal data.

Transport-related data processor:

Data Manager name: **FEDEX (Federal Express Corporation Magyarországi Fióktelepe)**

Address: **Hungary, H-2220 Vecsés, Lőrinci út 59.**

VAT number: **22246891-2-42**

Registration number: **Cg.01-17-000399**

Postal address: **Hungary, H-2220 Vecsés, Lőrinci út 59.**

Location of data processing: **Hungary, H-2220 Vecsés, Lőrinci út 59.**

Email: **info@fedex.com**

Telephone: **+3640980980**

The data processor shall cooperate with the data controller in the manner specified in a written contract for the delivery of the ordered product. Personal data required for the delivery of the product: the name, address and telephone number of the customer can be handled by the data processor until the delivery time, and immediately deleted.

Billing-related data processing:

Data Manager: **Kosher Energy Drink Zrt.**

Address: **Hungary, H-1025 Budapest, Törökvész u.123/B.**

VAT number: **26110556-2-41**

Registration number: **Cg. 01 10 049453**

Postal address: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Location of data processing: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Email: **kosher@kosherenergydrink.com**

Telephone: **+36302702151**

The data processor shall cooperate with the data controller in the manner specified in a written contract for the issuance of the invoice. The name and address of the buyer for the personal data

necessary for issuing the invoice must be kept by the data processor for at least 8 years under the terms of Section 169 of Act C of 2000.

Data processing related to storing an account:

Data Manager: **Kosher Energy Drink Zrt.**

Address: **Hungary, H-1025 Budapest, Törökvész u.123/B.**

VAT number: **26110556-2-41**

Registration number: **Cg. 01 10 049453**

Postal address: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Location of data processing: **Hungary, H-1025 Budapest, Törökvész u. 123/B.**

Email: **kosher@kosherenergydrink.com**

Telephone: **+36302702151**

The data processor shall cooperate with the data controller in the manner specified in a written contract for storing the account. The data processor shall keep the data of the Affected for at least 8 years under Section 169 of Act C of 2000.

DATA SECURITY

The Data Controller shall endeavor to take all reasonable steps to secure the security of the computer systems it uses, in particular to prevent unauthorized access to the data stored on the site.

To ensure the privacy of your personal information, we have taken the following steps:

- ensuring the continuing confidentiality of systems and services used to manage personal data;
- In the case of a physical or technical incident, the ability to restore access to personal data and the availability of data in a timely manner;

USER'S DATA MANAGEMENT RIGHTS

The User may request information about handling your personal information and may request the rectification, deletion and blocking of your personal information.

The User may request the deletion or modification of your personal data or data management information as follows:

by E-mail: **kosher@kosherenergydrink.com**

by Post: **Hungary H-1025 Budapest, Törökvész u. 123/B.**

At the request of the User, the Data Controller shall provide information on the data he / she handles, the legal basis, purpose and duration of the data management. The Data Controller shall provide the information in writing within the shortest possible time from the submission of the request, but not later than within 25 days. The user can at any time request correction, modification or deletion of the data. The data controller must complete the correction, modification or deletion of the data requested by the user within 25 days. If, within 25 days of receipt of the request, the data controller communicates in electronic form the factual and legal grounds for rejecting an application for rectification, blocking or cancellation. In the case of refusal of an application for rectification, cancellation or blocking, the data controller shall inform the Appellant of the possibility of appeal to the court and of the possibility of appeal to the Authority.

The natural person must be informed in a concise, transparent, comprehensible and easily accessible form, in a clear and unambiguous form.

The information shall be provided in writing or otherwise, including, where appropriate, the electronic path. Oral information may be provided at the request of the Person, provided that the Person's identity is otherwise verified.

The data controller shall inform the affected Party without delay, without undue delay but within one month of receiving the request, of the action taken on the application.

If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by two additional months. The controller shall inform the person concerned of the extension of the time limit by indicating the reasons for the delay within one month of receipt of the application. If you have submitted the request electronically, the information should be provided electronically if possible, unless otherwise requested by the User.

If the data controller fails to take action upon the request of the Affected Party, he informs the Affected Party of the reasons for the non-action as well as of the fact that the Affected Complaint may be filed with a supervisory authority and may exercise his right of judicial redress within one month from the receipt of the request.

Transparent right to prior information

Natural persons are entitled to receive their personal data in a compact, transparent and easily accessible form, clearly and easily understood.

Access right

The Affected Person is entitled to receive feedback from the Data Controller as to whether his personal data is being processed. The data controller shall provide a copy of the personal data subject to data processing to Freehold. For additional copies requested by the Customer, the data controller may charge a reasonable fee based on administrative costs. If you have submitted the request electronically, the information should be provided in a widely used electronic format. This should not adversely affect the rights and freedoms of others.

Right to rectification

The Affected person is entitled to request that the data controller correct the improper personal data relating to him without undue delay.

The right to cancel

You may at any time have the right, at your request, to delete the personal data of the data controller without undue delay if

- personal data is no longer needed for the purpose from which they were collected
- the User withdraws the consent of the data controller and does not have any other legal basis for data handling
- the Opponent objects to the handling of his data and no prior legitimate reason for data handling
- personal data was unlawfully handled.

If the data controller has granted third parties access to the data requested for deletion, he / she must inform those who have disclosed the Affected Data to delete all references or personal data stored there.

Right to Restrict Data Management

The Affected Person is entitled to request that the Data Controller restricts the processing of data on request if one of the following is met

- the Customer disputes the accuracy of personal data;
- Data handling is illegal and the Opposition opposes the deletion of the data and instead asks for their use to be restricted;
- the data controller no longer needs personal data, but the Requested Party requires them to enforce legal claims.

The right to data storage

The Affected person is entitled to receive the personal data provided to him by a data controller in a fragmented, widely used machine-readable format and to transfer this data to another data controller without being obstructed by the data controller whose the personal data is made available to you when the data is processed on a contractual basis or on a contract basis and the data is processed in an automated way.

Automated data management

The Affected person is not entitled to exclude the scope of a decision based solely on automated data management, including profiling, which would significantly affect it.

Right to Objection: The Affected Person is entitled to object, at any time, to his or her personal data, based on Article 6 (1) (e) or (f), including profiling based on those provisions. In this case, the data controller may not process the personal data unless the data controller proves that the data handling is justified by legitimate compelling reasons which take precedence over the interests, rights and freedoms of the interested party. The data controller shall review the protest within the shortest

time, but not later than 15 days from the submission of the request, and decide on the matter of its validity and shall inform the applicant in writing.

If the Data Handler fails to comply with a user's request for rectification, blocking or deletion, the fact and legal justification for rejecting the request for correction, blocking or deletion is reported in writing within 25 days of receipt of the request. In the case of refusal of an application for rectification, cancellation or blocking, the data controller shall inform the person concerned of the possibility of a judicial remedy and of the possibility of appeal to the Authority.

Presentation of complaints handling:

If, according to the Affirmation, the Data Controller has failed to comply with any statutory provisions on data management regarding your data or has failed to comply with your Affected Data Handling request, you may initiate an investigation procedure for the Felhasználó Nemzeti Adatvédelmi és Információszabadság Hatóság (User's National Privacy and Information Authority) with one of the following contact details:

Postal address: **Hungary, H-1530 Budapest, Pf.: 5.,**

Email: ugyfelszolgalat@naih.com

If the person concerned does not agree with the data controller's decision, he or she may appeal to the court within 30 days of the notification.