



Privacy Notice

The operator of www.continentaltobacco.com hereby informs the visitors of the website (hereinafter: website) about the practice followed in the field of personal data processing, the organizational and technical measures taken to protect the data, as well as about the related rights of the visitors and the possibilities of enforcing/exercising them.

This Privacy Notice contains the basic information concerning the processing and registration of the personal data of the User (hereinafter: User) using the Data Controller's website. If you have any questions about the processing of your data, please contact our company before using the website.

1. Data of data controller:

Name:	Continental Dohányipari Zrt.
Seat:	3980 Sátoraljaújhely Dohány u. 1-3.
Address:	3980 Sátoraljaújhely Dohány u. 1-3.
E-mail:	adatvedelem@continentaltobacco.com
Phone:	+36 30 854 8261
Website:	www.continentaltobacco.com

2. Data of Hosting Provider:

Name:	Fingerprint Kft.
Seat:	6729 Szeged, Szabadkai út 9/A
Address:	6729 Szeged, Szabadkai út 9/A
E-mail:	info@fingerprint.hu
Phone:	+36 30 747 2000
Website:	www.fingerprint.hu

3. Description of the data processing performed during the operation of the website

3.1. Use of cookies

The website may place cookies on the User's browsing device, if this is expressly approved by the User when first accessing the website. It is important that these cookies are not placed at the Operator, but on the User's own device used for browsing, so the User is the one who has full control over them.

When viewing/visiting the website, the cookies placed on the User's computer may automatically record the start and end time of the User's visit, IP address and, in some cases - depending on the settings of the User's computer – the type and language of the browser and the operating system, the parameters of the User's device, settings specified by the User on the website, the visited subpages and time spent on them. The Data Controller does not link and cannot link this data with personal data, the User decides on their sharing in the expressed authorization and consent given to us and in his/her cookie settings specified in his/her browser.

If the User does not accept the use of cookies, certain functions will not be available to him. If you have agreed to the use of cookies on your first visit to the website, but later wish to revoke this



consent, you can set the deletion of cookies for the website in your own browser. You can find more information about deleting of cookies at the following links:

- a) Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#>
- b) Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer>
- c) Goggle Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- d) Safari: https://support.apple.com/kb/ph21411?locale=en_USA

3.2. Contact data

If the User asks us a question about any of our services via the registration form filled in on the website, or by e-mail or telephone, he/she must provide the personal data necessary for liaise and fulfillment of the information request.

The categories and storage time of this data is handled as follows:

Processed data:	Name, company name, E-mail, business sector in which it operates.
Purpose of processing:	Liaising and communication/keeping in touch with User and determining our most appropriate service for User
Legal ground of processing:	Our legitimate interest to contact the User (Regulation Article 6 (1) f))
Period of processing:	Until the relationship/connection with the User exists or the User's consent is revoked

3.3. Data processed related to the justification of consent

During the liaise, the IT system stores the IT data related to the consent for later verification.

Processed data:	Date of consent and IP address of the person concerned.
Purpose of processing:	Due to legal requirements, the consent must be able to be verified by the Data Controller at a later date
Legal ground of processing:	Article 7 (1) of the Regulation provides for/prescribes this obligation. Data processing pursuant to Article 6 (1) (c) of the Regulation
Period of processing:	It is stored for the limitation period after the termination of data management.



3.4. Data processed in connection with the conclusion of the contract and the provision of the service

In order to use the services provided by the Data Controller, the User must conclude a contract or provide data corresponding to the given service during the use of the service.

Processed data:	Name, address, telephone number and E-mail of the contact in the contract
Purpose of processing:	Liaise during the provision of the service
Legal ground of processing:	If the partner is natural person the data processing is required to conclude the contract. Data processing pursuant to Article 6 (1) (c) of the Regulation. If the partner is legal person, than the legal ground is our legitimate interest (Article 6 (1) f) of the Regulation).
Period of processing:	Pursuant to Section 169 (1) - (2) of Accounting Act, companies must storage the accounting documents directly and indirectly supporting the accounting for 8 years.

3.5. Data processed in connection with document storage obligations and invoicing based on the Accounting Act.

The data processing is carried out in order to issue an invoice in accordance with the law and to fulfill the obligation to storage the accounting document.

Processed data:	Name, address, telephone number and E-mail of the contact in the contract and the contracting parties
Purpose of processing:	Pursuant to Section 169§ (1) - (2) of Accounting Act, companies must storage the accounting documents directly and indirectly supporting the accounting.
Legal ground of processing:	Pursuant to 159§ (1) of Act CXXVII of 2007 on Value Added Tax, the issuance of the invoice is mandatory and Pursuant to Section 169§ (2) of Accounting Act the storage of invoice is mandatory as well. Data processing pursuant to Article 6 (1) (c) of the Regulation.
Period of processing:	Pursuant to Section 169§ (2) of Accounting Act, companies must storage the invoices for 8 years, starting from the issue of the invoice.



3.6. Additional data processing

If the Data Controller wishes to perform further data processing, he/she shall provide preliminary information on the essential circumstances of the data processing (legal background and legal basis of data processing, purpose of data processing, category of data processed, duration of data processing).

We inform you that the Data Controller must comply with the written data requests of the authorities based on legal authorization. The Data Controller shall keep records based on Privacy Act in accordance with Section 15 (2) - (3) (about to which authority, what personal data, on what legal basis, when was transmitted by the Data Controller), the content of which the Data Controller provides on request, unless its disclosure is excluded by law. There is no data transfer outside Hungary.

4. Data security measures

The Company, as Data Controller, has taken appropriate technical and organizational measures (physical, IT protection and definition of authorization levels) to protect personal data.

The measures cover the following areas:

- preventing unauthorized access to processed data,
- unauthorized disclosure of data,
- change of processed data,
- loss of data, data destruction.

5. Data management rights and remedies

It is extremely important to us that you are aware of your rights related to the processing of your personal data.

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals 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 - GDPR) 15-20th You have the right to:

a) access to personal data:

- You have the right to receive feedback from the Company as to whether your personal data is being processed and if such processing is in progress, you are entitled to have access to your personal data and to be informed of the circumstances surrounding their processing. The information requested may cover, inter alia, the following data: the purposes of the processing; categories of personal data; the recipients or categories of recipients to whom the personal data have been or will be communicated by the Company; the intended duration of the storage of personal data; and, if the data was not collected directly from You, all available information about their source.



b) *request the rectification of personal data:*

- You have the right to request to have your inaccurate personal data corrected by the Company without undue delay and to request supplementation of incomplete personal data.

c) *request the erasure of personal data:*

- You have the right to request the Company, to erase personal data without undue delay if any of the following reasons exist:
 - personal data is no longer needed;
 - if the consent on which the data processing is based is revoked and there is no other legal basis for the data processing;
 - You object to the data processing and there is no priority legitimate reason for the data processing;
 - if the personal data has been processed unlawfully by the Company;
 - if personal data must be deleted based on law
- The data will not be erased by the Company if the data processing is necessary for one of the following reasons: (i) for the purpose of exercising the right to freedom of expression and information; (ii) for the purpose of fulfilling a legal obligation to process personal data; (iii) for bringing, asserting or defending legal claims.

d) *request a restriction on the processing of personal data:*

- You have the right to request the Company, to restrict data processing if any of the following reasons exist:
 - You dispute the accuracy of your personal information, in which case the restriction applies to the period of time that allows the Company to verify the accuracy of your personal information;
 - the data processing is illegal and you oppose the erasure of the data and instead ask for a restriction on their use;



- the Company no longer needs personal data for data processing purposes, but you need them for bringing, asserting or defending legal claims
- You objected to the data processing; in that case, the restriction shall apply for as long as it is established whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the data subject.
- In the event of a restriction on data processing, personal data may only be processed - except for storage - with your consent or for the purpose of bringing, enforcing or protecting legal claims or protecting the rights of another natural or legal person, or in case of the important public interest of the Union or a Member State. The Company will provide you with prior notice of the lifting of the restriction.

e) object to the processing of your personal data:

- You have the right to object to the processing of your personal data based on the legitimate interests of the Company at any time for reasons related to your own situation. In this case, the Company may no longer process personal data unless the Company demonstrates that the processing is justified by priority legitimate reasons which take precedence over your interests, rights and freedoms or which relate to bringing, asserting or defending legal claims.

f) receive personal data and transfer them to another Data Controller, provided that the legal preconditions exist (right to data portability):

- If you do not infringe on the rights and freedoms of others, you have the right to receive your personal information in a structured, widely used, machine-readable format. You are also entitled to have the Company transfer this data directly to another Data Controller if
 - a) the processing is necessary for your consent or for the conclusion of a contract to which you are a party or to take steps at your request prior to the conclusion of the contract; and
 - b) the data are processed in an automated way, i.e. personal data are processed in an IT system and not on a paper basis.



g) if personal data are processed on the basis of Your consent, You may withdraw your consent at any time.

- The Company shall, without undue delay and at the latest within 20 days from the receipt of the request, provide information on the action taken following the request or the reasons for its non-compliance.
- If you do not agree with our answer or feedback, Y have legal remedies, so you can go to court or complain to the National Authority for Data Protection and Freedom of Information (NAIH, registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c; phone number: +36 1 391 1400; fax : +36 1 391 1410; E-mail: ugyfelszolgalat@naih.hu).

6. Amendments to the Privacy Notice

In connection with this Privacy Notice, the Data Controller reserves the right to amend the Privacy Notice at any time without affecting the purpose and legal ground of the data processing. Following the entry into force of the amendment to the Privacy Notice, by using the website you accept the amended Privacy Notice.

