

## Privacy Policy – Közbeszerzés Figyelő Ltd.

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### Privacy policy

**Data privacy is of high importance for aop-baza.bg and Közbeszerzés Figyelő Ltd and we want to be open and transparent with our processing of your personal data. We therefore have a policy setting out how your personal data will be processed and protected.**

#### **Who is the controller of your personal data?**

The Hungarian company, Közbeszerzés Figyelő Ltd, is the controller of the personal data you submit to us and responsible for your personal data under applicable data protection law.

Közbeszerzés Figyelő Ltd

Móricz Zsigmond str. 196.

2017 Leányfalu

Hungary

VAT registration number: HU4504208213

**Where do we store your data?**

The data that we collect from you is stored within the European Economic Area (“EEA”).

Server provider:

DoclerNet Hosting Ltd

1101 Budapest, Expo sq. 5-7.

Telephone nr: +36 1 432 3133

Email: [info@doclernet.hu](mailto:info@doclernet.hu)

**Who can access your data?**

The employees of Közbeszerzés Figyelő Ltd.

We never pass on, sell or swap your data for marketing purposes to third parties outside the Közbeszerzés Figyelő Ltd. Data that is forwarded to third parties, is only used to provide you with our services. You will find categories of third parties under every specific process below.

**What is the legal ground for processing?**

For every specific process of personal data we collect from you, we will inform you whether the provision of personal data is statutory or required to enter a contract and whether it is an obligation to provide the personal data and possible consequences if you choose not to.

**What are your rights?**

Right to access:

You have the right to request information about the personal data we hold on you at any time. You can contact us at [info@aop-baza.bg](mailto:info@aop-baza.bg) and we will provide you with your personal data via e-mail within 30 days.

Right to portability:

Whenever aop-baza.bg processes your personal data, by automated means based on your consent or based on an agreement, you have the right to get a copy of your data transferred to you or to another party within 30 days in an electronic format. This only includes the personal data you have submitted to us.

Right to rectification:

You have the right to request rectification of your personal data if the information is incorrect, including the right to have incomplete personal data completed. If you have a aop-baza.bg account, you can edit your personal data under your account pages.

#### Right to erasure:

You have the right to erase any personal data processed by Közbeszerzés Figyelő Ltd at any time except for the following situations:

- You have an ongoing matter with Customer Service
- You have an open order which has not yet been serviced or partially serviced
- You have an unsettled debt with Közbeszerzés Figyelő Ltd, regardless of the payment method
- If you are suspected or have misused our services within the last three years
- your debt has been sold to a third party within the last three years or one year for deceased customers
- Your credit application has been rejected within the last three months
- If you have made any purchase, we will keep your personal data in connection to your transaction for book-keeping purposes

#### Your right to object to processing based on legitimate interest:

You have the right to object to processing of your personal data that is based on Közbeszerzés Figyelő Ltd's legitimate interest. Közbeszerzés Figyelő Ltd will not continue to process the personal data unless we can demonstrate legitimate grounds for the process which overrides your interest and rights or due to legal claims.

#### Your right to object to direct marketing:

You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes.

#### You can opt out from direct marketing by the following means:

- following the instruction in each marketing emails
- via e-mail at [info@aop-baza.bg](mailto:info@aop-baza.bg) or [info@kozbeszerzesfigyelo.hu](mailto:info@kozbeszerzesfigyelo.hu)

#### Right to restriction:

You have the right to request that Közbeszerzés Figyelő Ltd restricts the process of your personal data under the following circumstances:

- If you object to a processing based on Közbeszerzés Figyelő Ltd's legitimate interest, Közbeszerzés Figyelő Ltd shall restrict all processing of such data pending the verification of the legitimate interest.
- if you have a claim that your personal data is incorrect, Közbeszerzés Figyelő Ltd must restrict all processing of such data pending the verification of the accuracy of the personal data.
- If the processing is unlawful you can oppose the erasure of personal data and instead request the restriction of the use of your personal data instead
- If Közbeszerzés Figyelő Ltd no longer needs the personal data but it is required by you to defend legal claims.

#### **How can you exercise your rights?**

We take data protection very seriously and therefore we have dedicated customer service personnel to handle your requests in relation to your rights stated above. You can always reach them at [info@aop-baza.bg](mailto:info@aop-baza.bg) or [info@kozbeszerzesfigyelo.hu](mailto:info@kozbeszerzesfigyelo.hu).

#### **Right to complain with a supervisory authority:**

If you consider Közbeszerzés Figyelő Ltd to process your personal data in an incorrect way you can contact us. You also have the right to raise a complaint to a supervisory authority.

*Nemzeti Adatvédelmi és Információszabadság Hatóság  
National Personal Data Protection and Patent Authority*

Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Telephone: +36 (1) 391-1400

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

#### **Updates to our Privacy Notice:**

We may need to update our Privacy Notice. The latest version of the Privacy Notice is always available on our website. We will communicate any material changes to the Privacy Notice.

### [Online shopping](#)

#### **Why do we use your personal data?**

We will use your personal data to manage your purchase online at Közbeszerzés Figyelő Ltd by processing your orders via our online services and send you notifications in the event of any problems with the delivery.

We will use your personal data to manage your payments.

We will also use your data in order to handle complaints.

Your personal data is being used to identify you and to confirm your address with external partners.

### **What types of personal data do we process?**

We will process following categories of personal data

- contact information such as name, address, e-mail address and telephone number
- Payment information and payment history
- order information

If you have a aop-baza.bg account, we will also process your personal data submitted in relation to the account such as

- account ID
- shopping and order history

### **Who has access to your personal data?**

Only the employees of Közbeszerzés Figyelő Ltd have the access to your data.

### **What is the legal ground to process your personal data?**

The processing of your personal data is necessary for aop-baza.bg to fulfil the service of managing and delivering the ordered services to you.

### **How long do we save your data?**

We will keep your data as long as you are an active customer. For customers with an account we will keep the personal data for 36 months after the last purchase.

## Direct marketing

### **Why do we use your personal data?**

We will use your personal data to send you marketing offers, information surveys and invitations through e-mails, text messages, phone calls.

In order to optimise your experience of aop-baza.bg we will provide you with relevant information, recommended products and send you personalised offers.

### **What types of personal data do we process?**

We will process following categories of personal data

- contact information such as e-mail address, telephone number and postal code
- Name

If you have a aop-baza.bg account, we will also process your personal data submitted in relation to the account such as:

- Name
- address
- shopping and order history

### **Who has access to your personal data?**

We never pass on, sell or swap your data for marketing purposes to third parties outside the Közbeszerzés Figyelő Ltd.

### **What is the legal ground to process your personal data?**

The processing of your personal data is based on your consent when you agree to direct marketing.

### **Your right to withdraw your consent:**

You have the right to withdraw your consent for the processing of your personal data at any time and also object to direct marketing.

When you do so, Közbeszerzés Figyelő Ltd won't be able to send you any further direct marketing offers or information based on your consent.

You can opt out from direct marketing by the following means:

- following the instruction in each marketing post
- via e-mail at [info@aop-baza.bg](mailto:info@aop-baza.bg) or [info@kozbeszerzesfigyelo.hu](mailto:info@kozbeszerzesfigyelo.hu)

### **How long do we save your data?**

We will keep your data for direct marketing until you withdraw your consent.

## Customer service

### **Why do we use your personal data?**

We will use your personal data to manage your queries, to handle complaints, product and technical support matters through e-mail, telephone and through social media.

### **What types of personal data do we process?**

We will process any data you provide to us, including the following categories

- contact information such as name, address, e-mail address and telephone number
- Payment information and payment history
- order information
- Account number
- All correspondence in the matter

### **Who has access to your personal data?**

Only the employees of Közbeszerzés Figyelő Ltd have the access to your data.

### **What is the legal ground to process your personal data?**

The processing of your personal data is based on Your and Közbeszerzés Figyelő Ltd.'s legitimate interest.

### **How long do we keep your data?**

We will keep your data for e-mails logs, correspondence and case management for 36 months.

### **Your right to object to processing based on legitimate interest:**

You have the right to object to the processing of your personal data that is based on Közbeszerzés Figyelő Ltd's legitimate interest. Közbeszerzés Figyelő Ltd will not continue to process the personal data unless we can demonstrate a legitimate ground for the process which overrides your interest and rights or due to legal claims.

## Development and improvement

### **Why do we use your personal data?**

We will use data to evaluate, develop and improve our services, products and systems for all of our customers. For this purpose we will not analyse your data on an individual level.

This includes analysis to make our services more user-friendly, such as modifying the user interface in our digital channels and to improve IT systems in order to increase the security for our visitors and customers in general.

### **What types of personal data do we process?**

We will process following categories of personal data if you have chosen to provide it to us:

- Customer number
- Country
- account settings

We will process the following categories of personal data if you have made a purchase:

- order history
- payment history

### **Who has access to your personal data?**

Data that is forwarded to third parties, is only used to provide you with the services mentioned above. We use Google Analytics to analyse our customer online behaviour on a general level. [More information](#)

### **What is the legal ground to process your personal data?**

The processing of your personal data, to develop and improve our services and products, is based on our legitimate interest.

### **How long do we save your data?**

We will keep your data for as long as you have an active aop-baza.bg account.



**Your right to object to the processing of your data:**

You have the right to object to the processing of your personal data that is based on Közbeszerzés Figyelő Ltd's legitimate interest, by contacting [info@kozbeszerzesfigyelo.hu](mailto:info@kozbeszerzesfigyelo.hu). Your account will then be deleted and we will not be able to carry out our services to you.

## Fulfilment of legal obligations

**Why do we use your personal data?**

We will use your personal data to comply with obligations in laws, court rulings and decisions from authorities.

This includes using your personal data to collect and verify accounting data to comply with our book-keeping rules.

**What types of personal data do we process?**

We will process following categories of personal data

- Customer number
- Order number
- Name
- Postal address
- Transaction amount
- Transaction date

**Who has access to your personal data?**

We will share your personal data with IT companies that provide book-keeping system solutions.

**What is the legal ground to process your personal data?**

The processing of your personal data is necessary for Közbeszerzés Figyelő Ltd to fulfil its legal obligation.

**How long do we save your data?**

We will save your data in compliance with the Hungarian book-keeping rules.

## Cookies

A cookie is a small text file that is saved to, and, during subsequent visits, retrieved from your computer or mobile device. If you use our services, we will assume that you agree to the use of such cookie. You can easily erase cookies from your computer or mobile device using your browser.

### **How do we use cookies?**

We use permanent cookies to store your choice of start page and to store your details if you select "Remember me" when you log in.

We use both first- and third-party cookies to collect statistics and user data in aggregate and individual form in analysis tools to optimize our site and to present you with relevant marketing material.

### **What types of personal data do we process?**

The cookies at aop-baza.bg do not process personal data.

### **Who has access to your personal data?**

The cookies at aop-baza.bg do not process personal data.

### **How long do we save your data?**

The aop-baza.bg does not save your personal data.

You can easily erase cookies from your computer or mobile device using your browser. For instructions on how to handle and delete cookies please look under "Help" in your browser. You can choose to disable cookies, or to receive a notification each time a new cookie is sent to your computer or mobile device. Please note that if you choose to disable cookies, you will not be able to take advantage of all our features.

Information about cookie settings at different browsers:

[Google Chrome](#)

[Firefox](#)

[Microsoft Internet Explorer](#)