

# Privacy Policy

## 1.1. General provisions

Marinero Kft. (registered office: H-1117 Budapest, Irinyi József street 40. C. 1/5., company registration number: Cg. 01-09-289146); hereinafter: “**Company**”, “**Marinero**”, “**We**” or “**Us**”) operates the [www.marinero.hu](http://www.marinero.hu) website (hereafter: “**Marinero Platform**”, “**Website**”).

Marinero, as the data controller, is responsible for the collection, use, processing, storage and maintenance of personal data in accordance with applicable data protection law and, in particular, with the General Data Protection Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, "GDPR") and any and all applicable (supplementing) data protection laws and regulations, as amended from time to time.

By agreeing to this Privacy Policy, you acknowledge the notice provided by Marinero regarding the processing of your personal data and you consent to the processing of your personal data where consent is necessary.

## 1.2. Definitions

“**Personal data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Processing**” means any operation, or set of operations, which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 1.3. The purpose for which we process Personal data and the legal basis for the processing

We collect, hold, use and disclose Personal data from you or about you primarily for the following purposes (where applicable):

Legal basis for data processing	Purpose of data processing
processing is necessary for the performance of a contract, Article 6. point 1. (b) of the GDPR;	<ul style="list-style-type: none"><li>to answer your queries;</li><li>to maintain our business relationship, where you are a user of our Website;</li><li>to keep in touch with you;</li></ul>
consent of the data subject, Article 6. point 1. (a)	<ul style="list-style-type: none"><li>fraud checks, marketing and promotions, website traffic analysis.</li></ul>

We will not disclose Personal data about you for any other purposes, except:

- we are under a legal duty to do so, including circumstances where we are under a lawful duty of care to disclose information or
- such disclosure is authorised or permitted by yourself, the relevant authorities, or law.

#### **1.4. Personal data we process**

The kinds of Personal data that we commonly collect and hold from you or about you include (as provided by you): your name, email address and the content of the e-mail you have written to us.

When you browse our website or contact us electronically, we may record: geographical tagging, cookies, and statistical data.

#### **1.5. How do we collect and hold that information?**

We collect Personal data from you or about you:

- when you visit and interact with our Website;
- when you communicate with us via the Website, whether in direct message or by email.

By providing Personal data to us, you are expressly and voluntarily accepting the terms and conditions of this Privacy Policy and agreeing to our processing of your Personal data.

In connection with your use of the Website, we may also collect cookies from your computer, which enables us to tell when you use the Website and also to help customise your Website experience.

#### **1.6. Your data protection rights**

You may request information on processing, rectification, erasure. You may not request erasure of data if data processing is mandatory pursuant to applicable law.

You may request us to confirm whether or not your personal data is processed and, where that is the case, you may request access to the personal data.

You may have the right to request us to rectify any inaccuracies in your personal data.

You may have the right to request us to restrict the processing your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

When the processing of your personal data is based on your consent, you can withdraw your consent at any time without giving us any reason by contacting us under any of our contact details. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

If you feel that your personal data rights have been breached, please contact us first. Furthermore, you can also contact and lodge a complaint with the local data protection authority, in particular in the Member State of the European Union of your habitual residence.

In Hungary you may lodge your complaint with:

National Data Protection and Freedom of Information Authority  
Seat: H-1055, Hungary, Budapest, Falk Miksa street 9-11.  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)