

PRIVACY POLICY

Comp-let Party Service Kft. (registered office: 1037 Budapest, Szépvölgyi út 33.), hereinafter referred to as: the Service Provider or the Data Controller, acknowledges the contents of this legal statement as binding upon itself.

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, as well as Act CXII of 2011 on the Right to Informational Self-Determination and on the Freedom of Information (Infotv.), we provide the following information.

This privacy policy applies to data processing on the following website:

complet.hu

Modifications to this statement become effective upon publication at the above URL.

Comp-let Party Service Kft. is committed to protecting the personal data of its clients and partners, and places a high priority on respecting the right to informational self-determination of its customers. The company treats personal data confidentially and takes all technical, organizational, and security measures to ensure the safety of the data.

Data Controller Details

Name of the Data Controller: COMP-LET Party Service Kft.

Registered office and mailing address: 1037 Budapest, Szépvölgyi út 33.

Tax number: 11829289-2-41

Company registration number: 01 09 678775

Registering authority: Budapest Metropolitan Court

Representative: Péter Kis

Email: ajanlat@complet.hu

Phone: +36 30 625 6016

Website: <https://complet.hu/>

Definitions

The data protection terminology used in this policy shall be understood as follows:

- **Personal Data:** Any data relating to an identified or identifiable natural person ("data subject"). A person is identifiable if they can be identified, directly or

indirectly, in particular by reference to an identifier such as a name, ID number, or location data.

- **Consent:** A freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they agree to the processing of personal data relating to them.
- **Objection:** A statement made by the data subject opposing the processing of their personal data.
- **Data Controller:** The natural or legal person, public authority, agency, or other body which determines the purposes and means of the processing of personal data.
- **Data Processing:** Any operation performed on personal data, whether or not by automated means, such as collection, storage, use, disclosure, etc.
- **Data Transfer:** Making data available to a specified third party.
- **Disclosure:** Making data accessible to anyone.
- **Erasure:** Rendering data unrecognizable and irretrievable.
- **Blocking:** Marking data with an identifier to limit future processing temporarily or permanently.
- **Destruction:** The complete physical destruction of the data medium.
- **Data Processor:** A person or organization processing personal data on behalf of the controller.
- **Data Set:** A complete collection of data processed in a record system.
- **Third Party:** Anyone not identical with the data subject, data controller, or data processor.

Principles for Personal Data Processing

- **Lawfulness, fairness, transparency**
- **Purpose limitation:** Data shall only be processed for specific, explicit, and legitimate purposes.
- **Data minimization:** Only personal data necessary for the purpose shall be collected.
- **Accuracy:** Personal data must be accurate and kept up to date.
- **Storage limitation:** Data must be kept no longer than necessary.

- **Integrity and confidentiality:** Personal data must be protected against unauthorized or unlawful processing.
- **Accountability:** The controller shall be responsible for compliance and must be able to demonstrate it.

Data Processing Activities on the Website

A. Use of Cookies

What is a cookie?

Cookies are small files that store information on your browser or device. They help enhance the user experience, store preferences, and gather statistical data. Cookies do not contain personal information and cannot identify users directly.

Legal basis:

Act CXII of 2011 (Infotv.) and Act CVIII of 2001 (E-commerce Law). Legal basis: your consent [Infotv. 5. § (1)(a)].

Types of cookies used:

- **Strictly necessary cookies:** Enable core functions like navigation; expire at the end of your session.
- **Performance cookies:** Collect anonymous statistical data to improve website performance.

Disabling cookies may limit some functionalities.

Cookie management links:

- [Internet Explorer](#)
- [Firefox](#)
- [Chrome](#)

B. Order and Invoicing

Legal basis: Infotv. and the Accounting Act (Act C of 2000). Legal obligation: [Infotv. 6 § (5)(a)].

Purpose:

Issuing invoices and fulfilling statutory record-keeping obligations.

Data processed:

Name, address, email, phone number, tax number.

Retention period:

Invoices are retained for 8 years per the Accounting Act.

C. Delivery of Goods

Legal basis: Your consent under Infotv. 5. § (1)(a).

Purpose: Delivery of ordered goods via a contractual partner.

Data processed: Name, address, email, phone number.

Retention period: Until delivery is completed.

D. Handling Quality Complaints

Legal basis: Voluntary consent, Accounting Act, and Consumer Protection Act (Fgytv. 17/A. §).

Purpose: Handling complaints related to goods/services.

Data processed: Customer name, address, product name, purchase price, date of purchase and complaint, description of defect, customer claim, resolution method.

Retention periods:

- Return forms: 8 years
- Complaint records: 5 years
- Customer book entries: 2 years

E. Newsletter Subscription

Legal basis: Infotv. and Act XLVIII of 2008 on Commercial Advertising (Grt.). Based on consent [Grt. 6. § (1)-(2)].

Purpose: Sending marketing emails and promotional content.

Data processed: Name, email, phone number.

Retention period: Until consent is withdrawn.

F. Personalized Advertising

Legal basis: Infotv. and Grt. 6. § (1)-(2). Consent-based.

Purpose: Sending offers tailored to your preferences.

Data processed: Name, email, phone number.

Retention period: Until consent is withdrawn.

G. User Registration

Legal basis: Infotv. and Civil Code (Act V of 2013). Consent-based.

Purpose: Storing data to simplify future purchases.

Data processed: Name, username, address, phone, email, password, purchased product name and date.

Retention period: Until consent is withdrawn.

H. Website Visitor Data

Legal basis: Consent and E-commerce Act § 13/A (3).

Purpose: Monitor website performance, prevent misuse, and personalize service.

Data processed: Date/time, OS, browser, IP address (partially), geolocation.

Retention: IP address is deleted at end of session; other data stored for one month.

I. Inquiry Form

Legal basis: Consent, E-commerce Act, Accounting Act, Grt.

Purpose: Contact, marketing, and sharing of promotional offers.

Data processed: Name, email, phone, consent to direct marketing.

Retention period:

- Direct marketing: until consent is withdrawn
- Purchase data: 8 years (Accounting Act)

J. Online Payment

Payments are processed via **Barion Payment Zrt.**

(Headquarters: 1117 Budapest, Infopark sétány 1. I. ép. 5. em.;

<https://www.barion.com/hu/adatvedelmi-tajekoztato/>)

Data forwarded: IP address, name, phone, email, billing info, order amount.

Purpose: Processing of payment for products/services.

Data Processors and Data Transfers

In operating the website and fulfilling services, **Comp-let Party Service Kft.** may use the following external service providers as **Data Processors** or recipients:

- **Hosting service provider**
- **Courier and delivery companies**
- **Accounting and invoicing systems**
- **Newsletter platforms**
- **Online payment processors (e.g., Barion)**

These partners handle personal data exclusively under the instructions of the Data Controller and in accordance with the GDPR.

Data Security

The Data Controller commits to ensuring the security of the data and takes all necessary technical and organizational measures to prevent unauthorized access, alteration, disclosure, deletion, or damage.

These include:

- Controlled access to servers
- Use of firewalls and encryption
- Regular data backups
- Physical and logical access control

Rights of the Data Subject

You may exercise the following rights:

- **Right of access** to your personal data

- **Right to rectification** of inaccurate or incomplete data
- **Right to erasure** (“right to be forgotten”) where data is no longer needed
- **Right to restriction** of processing under certain conditions
- **Right to data portability** where applicable
- **Right to object** to processing (especially for direct marketing)
- **Right to withdraw consent** at any time

Legal Remedies

If you believe your data rights have been violated, you can:

Contact the Data Controller:

Email: ajanlat@complet.hu

Phone: +36 30 625 6016

File a complaint with the Hungarian National Authority for Data Protection and Freedom of Information:

- Address: 1055 Budapest, Falk Miksa utca 9-11.
- Mailing address: 1363 Budapest, Pf. 9.
- Phone: +36 (1) 391-1400
- Email: ugyfelszolgalat@naih.hu
- Website: <https://naih.hu>

You may also seek judicial remedy through the competent court based on your place of residence or stay.

Changes to the Policy

This privacy policy may be updated. Any changes will be published on the website:

<https://complet.hu>