# Privacy Policy of Graminae Kft.

# **DATA PROTECTION REGULATIONS**

Thank you very much for visiting our website. It is particularly important to us to comply with the statutory data protection regulations. The purpose of this data protection policy is to inform you, as a user of the website, about the nature, scope, and purpose of personal data processing, as well as your existing rights, provided that you are considered a data subject as defined in Article 4(1) of the General Data Protection Regulation (GDPR). This data protection policy takes into account the latest developments in accordance with the General Data Protection Regulation, which came into force on May 25, 2018. Simultaneously, this policy complies with the Hungarian "Info Act" (Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information).

#### 1. DEFINITION AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller is Graminae Kft. (hereinafter referred to as the Data Controller or Company).

Contact details:

Headquarters: 6336 Szakmár hrsz. 02/6.

Tax number: 14579828-2-03

Company registration date and number: 2008.12.31. 03 09 117294

General contact email: export@graminae.com

Phone: +36 30 520 2255

Mailing address: H - 6300 Kalocsa Határ út 1.

The Data Controller acknowledges the content of this Privacy Notice as binding and undertakes to ensure that all elements of this Notice and Policy are formulated in compliance with the applicable laws in Hungary and the EU.

# 2. GENERAL INFORMATION

During the development of graminae.com, we ensured that as little data as possible is collected from you. In principle, our website can be visited without providing any personal data. Personal data processing is only necessary if you choose to use certain services (e.g., using the contact form).

In such cases, we always ensure that we process your personal data only based on legal grounds or your consent. We comply with the provisions of the General Data Protection Regulation (GDPR), which has been in effect since May 25, 2018, as well as the relevant applicable national regulations.

# 3. DEFINITIONS

In accordance with the GDPR, the terms used in this data protection policy are defined as follows:

"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 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;

"Restriction of processing" means the marking of stored personal data with the aim of limiting their processing in the future;

"Pseudonymization" means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

"Controller" means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"Consent of the data subject" means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

# 4. CONSENT

When you visit our website, we may collect personal data about you. For this, we need your consent. We primarily do this during communication within our service area, especially when using the contact form, subscribing to newsletters, or processing orders.

#### **Consent Declaration**

By using the forms provided, you consent to the collection and processing of your personal data as outlined in this privacy policy. You can withdraw this consent at any time with future effect by sending us the appropriate declaration. However, it is important to note that without your consent, you will no longer be able to use our services. To withdraw, please use the above contact details (in this case, please provide your name and email address).

# 5. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We process personal data to legalize, fulfil, or manage the services we offer, and for this purpose, we apply Article 6(1)(b) of the GDPR as the legal basis. If we engage external service providers in the course of processing personal data based on a mandate, the legal basis for data processing is Article 28 of the GDPR.

We collect, process, and use personal data exclusively for the following purposes:

Purpose of data processing	Legal basis for data processing ("why data

	processing is necessary")	
contact and related communication	based on your consent	
handling your request and providing any	based on your consent	
additional advice you may need		

#### 6. COLLECTED AND PROCESSED PERSONAL DATA

We only collect and process personal data if you consciously and freely provide it to us, e.g., by filling out forms or sending emails. Initially, this includes the following data provided in the forms:

General contact details:		
Salutation		
First name		
Last name		
Phone number		

Message

**Email address** 

The personal data and their content provided by you will remain exclusively in our possession and that of our affiliated companies.

We store and process your data only for the purposes specified in section 5. Any use beyond the specified purposes requires your express consent. The same applies to the transfer or disclosure of your data to third parties.

### 7. GENERAL LOG FILES

The contact data of the requesting computer (IP address), the pages visited on our website, the date and duration of the visit, the identification data of the browser and operating system used, the website from which you visited us, and successful access are temporarily recorded in log files by the web server.

The technical administration of the web pages and the anonymous collection of statistical data allow the examination of the Graminae service access, as well as the investigation aimed at improving data protection and data security within our company to ultimately ensure the optimal level of protection for the personal data we process.

For analysis purposes, the server stores the log file data separately from all personal data provided for 12 months before deleting it.

Considering the storage duration, we delete personal data immediately once their storage is no longer necessary to achieve the original purpose, and all statutory retention periods have expired. The statutory retention periods provide the main criteria for the final storage duration of personal data. Once the retention period expires, the appropriate data is routinely deleted. If retention periods apply to the data, we limit the processing by locking them.

#### 9. CHANGES TO THE DATA PROTECTION POLICY

We continuously develop our website to provide you with better quality services. We keep this data protection policy up to date and revise it as necessary.

Of course, we will inform you in good time before any changes to this data protection policy take effect. We may do this, for example, by sending an email to the address you have provided. If further consent is required for processing your data, we will obtain it from you of course before any changes take effect.

#### **10. DATA PROTECTION OFFICER**

If you have any questions about data protection laws, please contact our data protection officer.

The website is operated by Graminae Kft.

Headquarters: 6336 Szakmár hrsz. 02/6.

Tax number: 14579828-2-03

Company registration date and number: 2008.12.31. 03 09 117294

Statistical number: 14579828-1061-113-03

Registering court: Registered by the Kecskemét Tribunal Court of Company Registration, Hungary.

CEO: Mrs. Ferencné Varga

Contact details:

Central email: export@graminae.com

Phone: +36 30 520 2255

Date: 2024.06.03.