

PRIVACY POLICY OF RÁBALUX ZRT.

Concerning the data processing activities conducted through the website www.rabalux.com

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Last Updated: November 8, 2024

This privacy policy summarizes the data processing activities carried out by **Rábalux Zrt.** (headquarters: 9027 Győr, Körtefa Street 5), as the data controller (hereinafter referred to as "**Data Controller**"), related to visitors of the website www.rabalux.com. Please read this privacy policy carefully. If you have any questions regarding the processing of your personal data, please feel free to contact us via any of the methods provided below.

1. Data Controller

- **Data Controller:** Rábalux Zrt.
- **Headquarters:** 9027 Győr, Körtefa Street 5
- **Mailing Address:** 9027 Győr, Körtefa Street 5
- **Represented by:** Kálmán Zsolt Baksa, CEO
- **Email:** info@rabalux.com

2. Personal Data Processed

Name of data processing	Purpose of processing	Legal basis for processing	Scope of data processed	Duration of processing
Contacting and responding to enquiries, preparing contracts and dealing with clients	The purpose of the processing is for the Data Controller to contact you, to respond to your enquiries via the contact details you have provided on the website and to keep in touch with you as a contact person for its contractual partner.	Your consent (Article 6(1)(a) GDPR) Article 6(1)(b) of the GDPR in relation to the contractual relationship	Name, contact email address and telephone number, claims made	The Data Controller processes the personal data until the date of the reply to your question or request, after which it is irretrievably deleted

LiTrack calculator: track lighting system data request	On the Data Controller's website, you can enter your details and design a lighting system, on the basis of which the Data Controller's partner can provide you with a quotation. In other words, the purpose of the data processing is to meet your specific needs.	Your consent is required to provide your data, Article 6(1)(a) GDPR Processing based on legitimate interest in the context of the transfer of data Article 6(1)(f) GDPR	Data provided in the form, typically for contact purposes	Personal data are processed by the Data Controller for as long as they are transmitted to its trading partner. Your data will therefore be transferred to our commercial partners with whom you can conclude a contract for the lamp system
Newsletters	The purpose of data processing is to promote the products, services and events of the Data Controller and to maintain contact with the Data Controller for this purpose, specifically by sending newsletters.	Explicit consent of the data subject (Article 6(1)(a) GDPR)	Name, e-mail address	Personal data will be processed until the date of withdrawal of consent (unsubscribe)
Organisation of prize draws	The purpose of the processing is to identify the participants of the prize draw, to draw the prize and then to deliver the prize	Consent of the data subject (Article 6(1)(a) GDPR)	Name, contact details, delivery details of the winner and the additional winner	Personal data will be processed until the prize is drawn. Delivery data will only be collected from the winner and the substitute winner
Use of cookies on www.rabalux.com	The Data Controller uses cookies on its website to record cookie acceptance, analyze website traffic and usage, display advertisements through the website, and facilitate the maintenance and	Processing based on consent Article 6(1)(a) GDPR Legitimate interest of the Data Controller in maintaining the functionality of its website with regard to cookies that are essential for the use of the website Article 6(1)(f) GDPR	IP address and other personal data stored by each cookie. Through statistical and marketing cookies, personal data is shared with Meta Platforms Ireland Ltd. and Google Ireland Ltd. in connection with	Cookies are processed until tracking is stopped (via cookie settings adjustments) or for a maximum period of 2 years from the date of the last visit to the website.

	development of the website.		the use of Meta Pixel and Google Analytics services.	
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3. Data Processors and Transfers

The Data Controller may disclose personal data provided by you to the competent authority, court or applicant in the event of a request by a public authority or court, or in justified cases in order to protect the rights and freedoms of the Data Controller or others.

When you visit our website, other service providers may also install cookies on your computer for the purpose of analysis or collection of statistical data, or for remarketing purposes. In this context, your data may also be processed by these service providers, such as Google (Google Ireland Ltd.) and Facebook (Meta Platforms Ltd).

When you order a LiTrack track lighting system, the data you provide on the form will be passed on to our respective commercial partner for the purpose of concluding a contract.

4. Data Security Measures

In order to protect its systems, the Data Controller applies documented technical and organisational measures at its headquarters to prevent unauthorised access to data.

In order to ensure an adequate level of data security, the Data Controller has assessed the risks associated with its data processing activities and evaluated them according to different criteria of severity and likelihood of occurrence.

The Data Controller shall ensure, in the operation of its IT systems, the necessary rights management, internal organisation and technical arrangements to prevent unauthorised persons from obtaining access to its data and to prevent unauthorised persons from deleting, extracting or modifying data. Data protection and data security requirements are also enforced with our data processors through a prior assessment and a data processing contract.

We keep records of any data breaches and, where necessary, we will report any incidents that occur.

Internet communications between the Data Controller and any person visiting the Data Controller's website are encrypted end-to-end via https (http+ssl).

The Data Controller uses password protection on its computers, and its IT tools are protected against intrusion.

The Data Controller shall password-protect its computers and destroy its storage media in accordance with a disposal protocol.

5. Rights of Data Subjects

At any time, you have the right to request information about the personal data we process about you by post, electronically or by telephone using the contact details provided in this notice.

We will inform you upon request:

- the data we process,
- the purposes for which the data are processed,
- the legal basis of the processing,
- duration of the processing,
- the purposes for which and by whom your data are being or have been collected.

The information will be provided in writing, on paper or by electronic means depending on the form of the request for information, within one month of the request.

You can object to the processing of your personal data at any time. We will examine the objection within the shortest possible time from the date of its submission, but not later than one month, decide whether it is justified and inform you of the decision.

At any time, you have the right to request the erasure of personal data processed by us or the rectification of personal data that have been incorrectly recorded.

In addition, we will block your personal data if you request it or if we have information available to us that suggests that deletion would harm your legitimate interests. We will continue to process the blocked personal data for as long as the processing purpose or legitimate interest that precluded the deletion of the personal data persists.

The data subject may request, through the contact details provided in this notice, that the Controller restricts the processing of his or her personal data (by clearly indicating the restriction and ensuring that the processing is kept separate from other data) where.

- contests the accuracy of his or her personal data (in which case the Controller will limit the processing for the period of time necessary to verify the accuracy of the personal data);
- the processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use;
- the controller no longer needs the personal data for the purposes of the processing but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing (in which case the restriction shall apply for a period of time until it is established whether the legitimate grounds of the controller prevail over the legitimate grounds of the data subject).

You have the right to obtain, through the contact details provided in this notice, personal data concerning you which you have provided to the Data Controller in a secure, commonly used, machine-readable format, and the right to transmit such data to another data controller without the Data Controller's hindrance.

Requests for access, erasure, rectification, restriction, blocking and blocking will be complied with and notified as soon as practicable, but not later than one month. If we have not been able to comply with your request, we will still comply with it within one month.

If we have transferred the data to another person with your consent, we will also notify the recipient of the transfer of the necessary steps.

Where we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. You may withdraw your consent by contacting the Data Controller at the contact details set out in this notice or, where otherwise appropriate, the Data Controller will ensure that you can withdraw your consent to the processing in a simpler way.

If you are visually impaired or elderly, you may request the Data Controller to provide you with the content of the Privacy Notice in word (text) or large print format, using the contact details set out in this Privacy Notice.

**You also have the right to lodge a complaint with the
National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11;

www.naih.hu,

Phone: +36 (1) 391-1400

E-mail: ugyfelszolgalat@naih.hu)

or to enforce your rights concerning the processing of personal data before a court having jurisdiction and competence pursuant to Act CXXX of 2016 on the Code of Civil Procedure.

The competent court can be found at the link below:

<https://birosag.hu/birosag-kereso>

You may exercise the rights listed in this notice at any time by contacting the Data Controller by e-mail or otherwise in writing. In the context of your request, you may ask the person making the request to identify himself or herself or to provide other personal data relating to him or her which may be used to establish eligibility. The request will be handled in the manner set out in the "Contact us" section of this Privacy Notice.

You can contact the Data Controller using the contact details set out in point 1.

Rábalux Zrt.

Data Controller