PRIVACY POLICY STATEMENT

CAVITY EYE HUNGARY KFT.

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1. Purpose of the Privacy Policy Statement

Cavity Eye Hungary Kft. (hereinafter referred to as the "Service Provider" or "Data Controller") acknowledges the content of this legal notice as binding upon itself. It commits to ensuring that all data processing activities related to its operations comply with this policy, the Hungarian Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, and Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, GDPR).

Cavity Eye Hungary Kft. reserves the right to amend this policy at any time, notifying the affected individuals in due time.

Cavity Eye Hungary Kft. is committed to protecting the personal data of its customers and partners, and places great importance on respecting the right to informational self-determination. It handles personal data confidentially and takes all necessary technical and security measures to ensure data protection.

The following describes the company's data processing practices.

2. Data of the Data Controller

Name	Cavity Eye Hungary Kft.
Website	www.cavityeye.com
Company registration number	13-09-197352
Registered address	2040 Budaörs, Templom tér 19.
Tax number	23921292-2-13
E-mail	info@cavityeye.com
Phone number	+36 76 739 125

3. Definitions

- **Personal Data**: 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 their physical, physiological, genetic, mental, economic, cultural, or social identity.
- **Data Processing**: Any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, including 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.

- **Data controller**: 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 processing are determined by Union or Member State law, such law may also determine the controller or the specific criteria for their designation.
- **Data processor:** A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the data controller;
- **Third party**: A natural or legal person, public authority, agency, or body other than the data subject, the controller, the processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- Data subject's consent: 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.
- **Data breach**: A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.

4. Scope of Personal Data Processed, Purpose, Legal Basis, and Duration of Processing

Cavity Eye Hungary Kft. processes the personal data of data subjects in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, GDPR).

4.1. Legal Basis for Data Processing

Data processing may be carried out on the following legal basis:

- based on the data subject's consent (Article 6(1)(a) GDPR),
- for the performance of a contract or in order to take steps prior to entering into a contract (Article 6(1)(b)),
- for compliance with a legal obligation (Article 6(1)(c)),
- or the purposes of the legitimate interests pursued by the data controller (Article 6(1)(f)).

4.2. Purpose of Data Processing

- provision, operation, and performance of services,

- fulfillment of legal obligations,
- management of customer relations and business communication,
- marketing activities, offering of quotations, management of inquiries,
- technical support and warranty administration.

4.3. Duration of Data Processing

The data controller retains personal data only for as long as the purpose of the data processing exists, or as long as required by law. The duration depends on the legal basis applied:

- In the case of consent-based processing, data is retained until the consent is withdrawn. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.
- In the case of data processing related to contract performance, personal data is retained until the general limitation period expires (generally 5 years) following the termination of the contract, unless another legal provision requires a longer retention period.
- In the case of processing for legal compliance, personal data is retained for the period specified by the applicable legislation
- In the case of processing based on legitimate interest, data is processed as long as the legitimate interest exists, or until the data subject objects and the controller cannot demonstrate that its legitimate interest overrides the interests or rights of the data subject.

4.4. Communication with Customers and Prospective Clients

Cavity Eye Hungary Kft. is authorized to process the contact details (name, email address, phone number, workplace, position) of current and former customers whose premises operate or have previously operated the company's products. The purpose of the data processing is business communication, technical support, quotations, maintenance, or informing them about new services. The legal basis for processing is the performance of a contract and the data controller's legitimate interest (Article 6(1)(b) and (f) GDPR).

Cavity Eye Hungary Kft. may also process the personal data of prospective clients who have established contact with the company in some form (e.g. at a professional event, personal meeting, online inquiry, or online form). The purpose of processing is to establish and maintain a business relationship, provide information, and make offers. The legal basis is the data controller's legitimate interest (Article 6(1)(f) GDPR). Data subjects have the right to object to the processing of their personal data, and Cavity Eye Hungary Kft. will assess such objections in every case.

4.5. Data Processing of Training Event Participants

Cavity Eye Hungary Kft. processes the personal data of individuals participating in educational, training, or workshop-type events (name, email address, phone number, workplace, position) for the purposes of organizing the event, maintaining contact, issuing certificates, and complying with adult education regulations. In the case of injection molding technology training, notification is made to the Adult Education Data Reporting System (FAR) as required by law.

The legal basis for data processing is the performance of a contract (Article 6(1)(b) GDPR), legitimate interest (Article 6(1)(f)), or, where necessary, the data subject's consent (Article 6(1)(a)). Data is retained for up to 1 year following the event, unless a longer retention period is required by law.

4.6. Marketing Newsletter Distribution

Cavity Eye Hungary Kft. is entitled to send newsletters and professional content (e.g. about training sessions, services, and industry tips) to natural persons who have contacted the company on behalf of a client or have been designated as contact persons. The legal basis for this data processing is the legitimate interest of the data controller, in accordance with Article 6(1)(f) of the GDPR. The controller's legitimate interest lies in providing relevant content to its professional clients and maintaining business relationships.

Newsletters are distributed with the assistance of a data processor. Every newsletter includes the option to unsubscribe. Data subjects may object to the sending of newsletters at any time or request that their data be removed from the mailing list.

4.7. Data processing related to access to electronic publications

Access to the electronic professional publications of Cavity Eye Hungary Kft. is subject to registration. The personal data provided during registration (name, e-mail address, phone number, company, position) are processed by the data controller for the purpose of delivering the requested publication and ensuring traceability of the request. The publication is sent with a unique watermark, which in all cases includes one of the data subject's personal data.

The legal basis for data processing is the data subject's consent (Article 6(1)(a) of the GDPR). Consent may be withdrawn at any time; such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

The data will be stored for a maximum of 3 years after the request, unless the data subject requests their erasure earlier.

4.8. Data processing related to promotional campaigns

Cavity Eye Hungary Kft. occasionally organizes promotional campaigns, in which participants may register online. Participation is voluntary, and the personal data provided during registration (name, e-mail address, phone number, company, position) are processed by the data controller solely for the purpose of conducting the promotion and contacting the winner(s), if applicable.

The detailed terms of participation and the description of the prize are published on the registration page related to the promotion (e.g. landing page).

The legal basis for data processing is the data subject's consent (Article 6(1)(a) of the GDPR). Consent may be withdrawn at any time; such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

Personal data will be stored for a maximum of 1 year after the promotion has ended, unless the data subject requests earlier erasure or provides further consent for other processing purposes (e.g. newsletter subscription).

5. Method of Personal Data Storage and Data Security

Access to the personal data processed by the data controller is restricted to authorized personnel only. Personal data is stored in electronic form either at the data controller's headquarters or on the servers of its data processors. The data controller applies technical and organizational measures that ensure:

- the confidentiality of the data,
- its integrity,
- its availability,
- and protection against unauthorized access.

Taking into account the current state of technology, the data controller implements technical, organizational, and structural safeguards that provide a level of protection appropriate to the risks associated with data processing.

We also inform data subjects that electronic messages transmitted via the internet, regardless of protocol (email, web, FTP, etc.), are vulnerable to network threats that may lead to dishonest activities, disclosure, or alteration of information. To protect against such threats, the data controller takes all reasonable precautions expected under the circumstances.

If a data protection incident occurs at the data controller and it is likely to result in a high risk to the rights and freedoms of data subjects, the controller shall notify the affected individuals of the incident without delay.

6. Data Transfers and Data Processing

Cavity Eye Hungary Kft. engages only those data processors who provide adequate guarantees regarding the security of personal data processing and who act solely on the instructions of the data controller. Personal data is processed only to the extent and for the duration necessary to provide the service.

Data may be accessed by:

- employees of Cavity Eye Hungary Kft. who perform data processing tasks,
- authorized data processors, including:
    - Hosting provider: Rackforest Zrt. (info@rackforest.com; +36 1 211 0044)
    - Website developer: SEOkey Informatikai Kft. (info@seokey.hu)
    - Newsletter service provider: MailerLite Limited (https://www.mailerlite.com/contact-us)
    - Web analytics provider: Google LLC (Google Analytics; support.google.com/policies/contact/general_privacy_form). Data processing is performed in the United States in accordance with the European Commission's approved Standard Contractual Clauses (SCC).
- For adult education activities, the Adult Education Data Reporting System (FAR) manager, based on legal obligation and within the scope defined by law,
- Authorities when required by law.

On social media platforms (Facebook, Instagram, LinkedIn, YouTube), public profile data may be accessed in accordance with the respective platform's privacy policies.

Data transfer to third parties occurs only if required by law or based on the data subject's consent.

7. Data Protection Contact Person

Cavity Eye Hungary Kft. has not appointed an official Data Protection Officer (DPO), as its data processing activities do not fall under the mandatory cases defined in Article 37 of the GDPR.

Contact person for data protection matters: Attila Szűcs

E-mail: info@cavityeye.com

Phone: +36 76 739 125

Inquiries regarding data protection should preferably be submitted in writing via email.

8. Cookie Management

Cookies are small data files that are placed on the user's computer through the website during use and are saved and stored by the browser. Further information about the use of cookies can be found in the “Help” section of most browsers.

8.1. Session Cookies

These cookies are intended to enable visitors to browse the website of Cavity Eye Hungary Kft. smoothly, use its functions, and access the services available on the site. This type of cookie is valid only for the duration of the browsing session and is automatically deleted when the browser is closed.

8.2. Third-Party Cookies

Cavity Eye Hungary Kft. uses third-party cookies, specifically Google Analytics, on its website. By using this statistical service, the data controller collects information on how visitors use the website. The data is used to improve the site and enhance the user experience. These cookies remain in the visitor's browser until their expiration date or until the visitor deletes them.

8.3. Modifying Cookie Settings

Users have the right to allow or refuse the use of non-essential cookies using the cookie banner that appears when accessing the website. They may also modify these settings at any time thereafter.

9. Data Subject Rights and Legal Remedies

Data subjects may request information free of charge at any time regarding the processing of their personal data and, in cases defined by law, may request the rectification, erasure, restriction, or blocking of their data.

9.1. Right of Access

Data subjects may receive confirmation from us as to whether or not personal data concerning them is being processed, and, if so, access to such personal data and information about its processing.

9.2. Right to Rectification

Upon request, we will rectify any inaccurate personal data concerning the data subject without undue delay. The data subject also has the right to have incomplete personal data completed, including by means of a supplementary statement.

9.3. Right to Erasure

Upon request, we will erase the personal data concerning the data subject if the data is no longer necessary, consent has been withdrawn, the data subject objects to processing, or the processing is unlawful.

9.4. Right to Be Forgotten

Upon request for erasure, we will—if so requested—make reasonable efforts to inform all data controllers who may have accessed the public personal data of our user that the data subject has requested the deletion of any links to, or copies or replication of, such personal data.

9.5. Right to Restrict Processing

At the data subject's request, we will restrict the processing of their personal data if the accuracy of the data is contested, the processing is unlawful, the data subject objects to the processing, or we no longer need the personal data for processing purposes.

9.6. Right to Data Portability

The data subject has the right to receive the personal data concerning them, which they have provided to us, in a structured, commonly used, and machine-readable format and has the right to transmit those data to another controller.

9.7. Right to Legal Remedy

We value the protection of personal data and respect the data subject's right to informational self-determination. We strive to respond to all requests fairly and within the appropriate time frame. Therefore, we kindly ask data subjects to first contact us with any complaints to seek a peaceful resolution before resorting to regulatory or judicial remedies.

If the issue cannot be resolved satisfactorily, complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

National Authority for Data Protection and Freedom of Information, 1055 Budapest, Falk Miksa u. 9-11., Mailing address: 1363 Budapest, Pf.: 9., Phone: 06-1-391-1400, Fax: 06-1-391-1410, E-mail: UGYFELSZOLGALAT@NAIH.HU, Website: HTTP://WWW.NAIH.HU

Kecskemét, 01. 03. 2026

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