

Privacy Policy

This Privacy Policy contains the rules and information related to the handling of personal data collected and handled by **Recycling Market Limited Liability Company** of 1095 Budapest, Lechner Ödön fasor 3. B, 2. floor 1. as operator (hereinafter: Operator) related to the use of the portal <https://recytrader.com/> (hereinafter: Portal).

Operator shall handle the data and information given by users and needed for the use and performance of the services provided by the Portal in accordance with Act CXII of 2011 on Informational Self-Determination and Freedom of Information and the Strasbourg Convention for the Protection of Individuals with regard to automatic processing of personal data dated 28 January 1981.

1) DEFINITIONS:

The terms used in this Privacy Policy shall have the following meaning:

Data processing	performing technical tasks in connection with data handling operations, regardless of the method and means used for executing the operations, as well as the place of execution.
Data handling	any operation or the totality of operations performed on the data, regardless of the procedure applied, thus, the collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use.
Data deletion	making data unrecognisable in a way that they can never again be restored.
Data blocking	rendering the forwarding, knowing, disclosure, transformation, alteration, annihilation, deletion, linkage or synchronisation and use of the date impossible indefinitely or definitely.
Consent	the freely given specific and informed indication of the User by which he unambiguously agrees to the full control of his personal data, or to the extent of specific operations. A form of this is consent given in an internet interface.
Personal data	data relating to any natural person User, as well as conclusions drawn from the data concerning the natural person User.
Act or Privacy Act	Act CXII of 2011 on Informational Self-Determination and Freedom of Information

2) DATA HANDLING RELATED TO REGISTRATION IN THE PORTAL:

2.1 The range of data handled and the purpose of data handling:

The Operator handles your personal data with a view to provide services and to enforce any claims in relation to them, exclusively to the extent and for the time period necessary. Data handling at all its stages shall comply with this purpose. Operator also handles the personal data which are technically indispensable for providing the service.

The range of data handled:

Personal data	The purpose of data handling
Full name	Indispensable for identification
e-mail address	serves the purpose of maintaining contact between the Operator and you
password	for secure login to the User's account
phone number	serves the purpose of maintaining contact between the Operator and you

In the event of a successful auction taking place in the Portal, the Operator transfers the personal data necessary to administer the transaction in relation to the legal relationship between the Seller and the Buyer, such as full name, e-mail address and phone number concerned in the given auction to the persons affected in the transaction.

2.2 *Legal basis of handling the data:* your consent which you expressly give in the course of registering in the Portal.

2.3 The period of handling the data

Personal data are handled until you withdraw your consent.

The deletion or modification of personal data can be initiated as follows:

- a. in a letter sent by mail or courier to 5000 Szolnok, Újszászi út 091/13 hrsz. VH2., or
- b. by e-mail to info@recytrader.com.

Otherwise, the due date for deleting the data in accordance with the rules of accounting is 31 December of the 8th year following the year in question.

3) RIGHTS RELATED TO DATA HANDLING:

a) Right to information:

Through the contact data given under Section 2.3 of this Privacy Policy you may request information in writing from the Operator about the following:

- what personal data,
- on what legal basis,
- for what purpose of data handling,
- from what source,
- how long the Operator handles your data,
- to whom, when, based on what legal regulation, and to which of your personal data was access granted and to whom the Operator forwarded your personal data.

Operator shall answer your request by letter sent to the address given by you within 30 days at the latest.

b) Right to rectification:

You may ask for the rectification of your personal data in writing in the manner specified under Section 2.3 through those addresses. Operator shall answer your request by letter sent to the address given by you within 30 days at the latest.

c) Right to deletion:

You may request the deletion of your personal data in writing in the manner specified under Section 2.3 through those addresses. Operator shall answer your request by letter sent to the address given by you within 30 days at the latest. The Operator may refuse a request to delete if legal regulation requires it to continue storing the personal data. When there is no such impediment, the Operator shall answer your request by letter sent to the address given by you within 30 days at the latest.

Service Provider shall delete your personal data if their handling is illegal, if your request it, if the data handled are deficient or erroneous and this condition cannot be legally rectified, provided that act of law does not exclude deletion, the purpose of data handling no longer exists or the period open for storing the data as specified by law has expired, or if the court or the National Authority for Data Protection and Freedom of Information has so ordained.

d) Right to blockage:

Operator shall block your personal data, if you so request, or if based on available information it can be assumed that deletion would violate your rightful interests. Blocked personal data can be handled only until the purpose of data handling obtains, which excluded its deletion. Blockage shall last until the reason indicated by you necessitates the blocking of the data.

e) *Right to protest:*

You may protest against the handling of your personal data, if

- a) the handling or forwarding of personal data is needed exclusively for the performance of any legal obligation of the Operator, or for the enforcement of the rightful interests of the Operator, the data recipient or a third person, unless the handling of the data is required by law;
- b) the use or forwarding of personal data is carried out exclusively for the purposes of direct acquisition, public opinion poll or scientific research;
- c) Any other case specified by law.

Operator shall examine the protest as soon as possible, but at the latest within 15 days from the submission of the request, make the decision with regard to its grounds and inform you thereof in writing. If the Operator establishes that the protest was well-founded, it shall cease handling the data, including capturing additional data or forwarding data, block the data and notify of the process and the measures taken on that bases all those to whom the personal data affected in the protest were earlier forwarded and who also need to take action with a view to enforcing the right to protest.

f) *Miscellaneous:*

Please be informed that the court, the prosecution, the investigating authority, the authority investigating petty offences, the administrative authority, the data protection commissioner and other agencies based on authorisation by legal regulation may request the Operator to provide information, data, hand over data and render documents available.

Operator shall hand over personal data to the authorities only to the extent that is indispensable for implementing the purpose of the request provided that the authority indicated the exact purpose and the range of data required.

Operator shall protect personal data with the appropriate measures, in particular against unauthorized access, alteration, forwarding, disclosure, deletion or annihilation and accidental annihilation, damage, and becoming inaccessible arising from alteration in the technology applied. To that end, Operator reserves the right that if it perceives a security gap in its system on the part of its clients or partners to inform its clients and partners of these, and simultaneously to restrict access to its system and services until the security gap is dealt with.

Please, be informed that phone calls with customer service (in and outgoing calls equally) will be recorded with a view to enabling the subsequent checking of legal statements, provided that the person concerned gives his consent. These calls will be digitally recorded in sound files on dedicated computers. These sound recordings will be stored for 1 year from recording and if requested, it will be possible to listen to that sound recording until that date. Beyond the 1-year storage period, sound recordings will be deleted from the system. A given sound recording will be deleted also if we receive a request to that effect. The Operator has the exclusive right to handle sound recordings. Please be informed that any complaints may be communicated to us through the phone customer service through a fixed line. If you do not wish to consent to the recording of your call, you need to expressly tell this to our colleague at the customer service.

4) POSSIBILITIES OF LEGAL REMEDY RELATED TO DATA HANDLING

If the User does not agree with the decision made by the Operator, he may turn to the court against this within 30 days from notification.

In the event of the violation of his rights, User may turn to the court against the Operator. The court shall take action on such cases out of turn. Complaints may also be made to the National Data Protection and Freedom of Information Authority at: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Data Protection and Freedom of Information Authority), 1125 Budapest, Szilágyi Erzsébet fasor 22/C.