positiveadamsky.hu website's
Privacy Policy

Who is the data controller?

The data controller who makes essential decisions regarding your personal data, in particular the one who determines its purposes and means. With regard to the data processing on the positiveadamsky.hu website (hereinafter: Website), only Positive by Hinora Group Kft. (hereinafter Organization or Company) is the data controller in all cases.

Our most important data are:
- Name / Company name: Positive by Hinora Group Ltd.
- Represents: Bálint Hinora Managing Director (Executive Officer)
- Seat: 1062 Budapest, Delibab Street 29.
- Company registration number: 01 09 739724
- VAT number: 13523439-2-42
- Address of central customer service: 1062 Budapest, Delibab Street 29.
- Telephone number: +36-1-249-1051
- Central e-mail address: info@positive.hu

The designated Data Protection Officer of the Organisation is:
- Name: dr. Balázs Kőmíves
- E-mail address: dpo@positive.hu

What is personal data?

Personal data means any information relating to an identified or identifiable natural person. In determining the identity of a natural person, account should be taken of all reasonable grounds that the controller may use to identify, directly or indirectly, that natural person.

Cookies are alphanumeric information packets sent by the web server with variable content, which are recorded on the user's computer and stored for a predetermined period of validity.

For what purpose is personal data processed on the Website?

When visiting the Website and using the services and functions available on the Website, data is processed by our Company in order to achieve the following purposes:

- replying to messages sent directly to e-mail addresses published on the website,
- fulfillment of requests for quotations sent using the request for quotation menu item,
- processing of personal data sent by newsletter subscribers on the Inspiring Minutes (https://positiveadamsky.hu/hirlevel-feliratkozas) site for direct and indirect sales

purposes. It has its own Privacy Policy:
https://positiveadamsky.hu/uploads/documentitem/1/adatkezelesi-tajekoztato-inspiralo-percek-20200914-1600282135.pdf

- processing personal data sent by applicants for job applications and traineeships advertised on the site (form on http://positiveadamsky.hu/karrier or direct e-mail to karrier@positive.hu) in order to expand the workforce, as well as to maintain contact with job applicants and provide them with information about the reopening of the job application and other applications favourable to the applicant,
- managing cookies to ensure the operation of the Website, to serve its visitors at a higher level, to compile visitor statistics and to support our marketing activities.

What is the legal basis for data processing?

With regard to the data processing purposes specified in this Privacy Policy, the legal basis for data processing, your informed and voluntary consent to the processing of your personal data. Consent is given either by providing personal data as an active action (sending an e-mail message), or by accepting this information and ticking the check-box confirming consent, or by clicking on the "Accept" button after customizing the ticks ("off", "on") of the window that pops up for setting web cookies, or by any other active action.

With regard to web cookies that do not require consent, the legal basis for data processing is the provision of Section 13/A (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Elkertv.), according to which the web service provider may process personal data that are technically indispensable for the provision of the service for the purpose of providing the service.

How can I withdraw my consent?

You have the right to withdraw your consent to the processing of personal data at any time without giving reasons. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You can report the withdrawal of consent to our company in writing (by post or electronic mail address) at the following contact details:

- Address of central customer service: 1062 Budapest, Delibab utca 29.
- Central e-mail address: info@positive.hu

How can I give or withdraw my consent to web cookies?

You, as the data subject, give your voluntary consent by actively acting by clicking on the "I ACCEPT" button when the short information window about cookie use pops up. When you visit the website for the first time, you will see a so-called "cookie window" where you can see the cookies used on our website grouped.

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Through the "cookie window" that appears, you can give your voluntary consent to the use of cookies for statistical and marketing purposes separately by switching the switches next to the cookies to the "ON" position.

You can change your settings – and withdraw your consent in this context – at any time on the website under the menu item "Change cookies" by switching the switches next to the cookies to the "OFF" position. In addition, you can delete all cookies used by the website at once by clicking on the "Delete cookies" menu item. Please note that when using the "Delete cookies" menu item, the "Essential basics" cookies are reinstalled on the website/device after deletion, as they are strictly necessary for the operation of the website.

How long do we process your personal data?
Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Taking into account this principle of storage limitation, our Company enforces the following data deletion requirements:
-   Messages sent directly or using the Contact menu item to e-mail addresses published on the website, as well as requests for quotations sent using the request for quotation menu item, are kept for 1 year.
-   Our Company retains all personal data related to the job application until the advertised position is filled or for 6 months from the date of receipt. Your personal data will be deleted following this or your objection to the 6-month retention. The purpose of the retention period of six months after filling the advertised position is to notify you of the reopening of the job application during this period and of any further job applications favorable to you.
-   If you accept cookies, they will be stored on your computer for 30 days, unless you delete them earlier. An exception to this is the so-called Session cookies, which are managed until the end of the visitor's session, so most often until the site is left.

To whom do we transfer your personal data?
In the course of processing your personal data, we use the services of Sybell Informatika Kft. (H -1158 Budapest, Késmárk u. 7/b 2. em. 206.) as data processor for IT system operation and server hosting services.

What web cookies do we use?
(1) 'essential funds' cookies:
These are cookies that are strictly necessary for the operation of the website. They are strictly necessary for the technical functioning of our website, help to make it easy to use, for example to store site navigation, user preferences or preferences, therefore it is not

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possible to deactivate them, but these cookies do not collect any information that qualifies as personal data. It is not necessary to obtain your consent for the management of these cookies, but we have to provide sufficient information about their use.

Appellation	Description	Expiry
Laravel_session	Storage of visitor data necessary for the operation of the website, recording the acceptance of the cookie message on the website.	24 hours or until you close your browser
Google reCaptcha cookie	Protection of forms on the website from bots.	Until you close your browser
XSRF-TOKEN	The cookie "CSRF/XSRF-TOKEN" is used for various forms on the site and is used for the so-called "CSRF/XSRF-TOKEN" cookie. Required to protect against "Cross-Site Request Forgery". The purpose of using this cookie is to prevent anyone else from submitting a form on behalf of the user.	The cookie is deleted from your computer within 2 hours of leaving the website.
PHPSSID	If the visitor visits our website, the PHPSESSID cookie will be used to keep the workflow alive for the specified period of time until the user closes his browser	Until you close your browser
Visitor	It stores visitor data necessary for the operation of the website and records the acceptance of cookie messages on the website	249 days
SIDCC	Security cookie, in order to protect the user's privacy.	3 months

2. 'statistics' cookies:

These cookies collect data through an anonymous identifier, so they do not store personal data. These cookies help us analyze website performance and improve our website. They provide us with information about the number of users, the number of pages downloaded and the device with which the visit took place (mobile, desktop, tablet, operating system type), the frequency of the visit without clearly identifying the users.

The purpose of cookies is also to understand the user's use of the website (e.g. pages viewed, navigation, session time) in order to further develop the website according to the needs of our visitors and to provide a high-quality, user-friendly experience.

Appellation	Description	Expiry
Google analytics (_ga, _gid, _gat)	Collecting data of visitors to the site, analysing their behavior, traffic monitoring including number and period of visits, device usage in order to target them with advertisements in the future. (https://google.com/analytics/).	Various (2 years – 24 hours)
Smartlook cookie	It enables the analysis of visitor behaviour on our website, which makes it easier and easier to use the website anonymously. (https://help.smartlook.com/en/articles/3244452-privacy-policy)	30 days
SID	We use it to store digitally signed and encrypted information about your Google Account ID and the most recent sign-in time. This helps prevent many attacks, such as attempts to steal the contents of forms you fill out on websites.	2 years
HSID	We use it to store digitally signed and encrypted information about your Google Account ID and the most recent sign-in time. These two cookies help prevent many attacks, such as attempts to steal the contents of forms filled out on websites.	730 days

(3) 'marketing' cookies:

These cookies provided by third-party providers are used to display advertisements on websites that are more relevant or of interest to you. These cookies also cannot identify you personally, they can collect information such as what page the visitor viewed, which part of the website the user clicked on, how many pages he visited, all in order to get to know the content of interest to you.

Please note that when using this website, 3rd party web cookies may also be installed to share content on social networks, to compile traffic statistics or to support our marketing activities.

Appellation	Description	Expiry
Facebook pixel (Facebook cookie)	It enables the measurement of our marketing activities in Facebook's services, and with its help the Service Provider can display advertisements to website visitors on Facebook.	Varies – please refer to Facebook's privacy notice for details: https://www. facebook.co m/legal/term s/businesstoo ls and http://hu- en.facebook. com/help/cookies/

Collect (Google Analytics)	Sends Google Analytics data about the visitor's device and behavior. Tracks the user across different tools and marketing channels	Session
ads/ga-audiences (Google Ads)	Used by Google Ads to re-engage visitors who are likely to become buyers based on their identified behavior across multiple websites	Session
__gfp_64b (Google DoubleClick)	They are used to link a user's activities across devices to show you more relevant ads.	Up to 26 months
_dc_gtm_UA-# (Google TAG Manager)	Google Tag Manager uses Google Analytics script to load the tag.	For cookies installed by Tag Manager, the cookie validity period is specified separately for the given 3rd Party cookies
1P_JAR (google.com)	This cookie collects website statistics and measures conversions according to the google.com's privacy policy	30 days
Facebook conversion pixel (Facebook)	Facebook remarketing cookies allow us to display advertisements related to the theme of our website to visitors to our website using Facebook's advertising system. You can find detailed information here: https://www.facebook.com/policie s/cookies/	Variable – please refer to Facebook's privacy policy for details
NID (google.com)	This helps us show you tailored ads on Google, according to the google.com's privacy statement	6 months
SAPISID (google.com)	Google plus the ability to like and share	2 years
APISID (Google)	They are used to link a user's activities across devices to show you more relevant ads.	2 years
IDE (Google DoubleClick)	They are used to link a user's activities across devices to show you more relevant ads. One of the main advertising cookies used on non-Google sites is called "IDE", which is stored under the doubleclick.net domain.	390 days
ANID (Google DoubleClick)	They are used to link a user's activities across devices to show you more relevant ads.	390 days
DSID (Google DoubleClick)	They are used to link a user's activities across devices to show you more relevant ads.	14 days

What is Google Analytics?

In connection with the website of the Organization, it uses the services of the Google Analytics system. Google Analytics is Google's analytics tool that helps you get a better picture of the activities of your website visitors (including your activities) and website performance without identifying visitors individually.

The primary purpose of the data collected by the Google Analytics cookie and their use is to enable the Organization to operate its website properly, which requires, in particular, tracking website visit data (e.g. number of visits, device usage). In addition, the Organization may use this information to analyze usage trends and to improve and develop the functionality of its website and to analyze the performance of the website.

Because Google Analytics comes from a third-party 3rd party provider (Google Inc.), the information it collects (including data from your activity on the website) may be used by Google, for example, to show more relevant ads across the web on Google services (such as Google Search) and to measure interactions with ads served by Google. Google may also transfer this data to third parties that Google uses to process the data.

You can find more information about the processing and use of data by Google Analytics and Google's privacy policy at the following links:
https://developers.google.com/analytics/resources/concepts/gaConceptsCookies?hl=hu
https://policies.google.com/technologies/cookies?hl=hu
https://policies.google.com/privacy?hl=hu

How can I have more control over web cookies?
You can exercise a higher level of control over web cookies by making settings (blocking, revoking) in your own browser. All modern browsers allow you to change your cookie settings. Most browsers automatically accept cookies by default, but it is now possible to block third-party cookies, limit retention periods, generally block and define exceptions.

You can find information about the cookie settings of the most popular browsers and the implementation of restrictions at the following links:

- Google Chrome
- Firefox
- Microsoft Internet Explorer 11
- Microsoft Internet Explorer 10

Web services that support limiting the collection and use of web cookies for advertising purposes, such as http://www.aboutads.info/choices and http://www.youronlinechoices.eu/ sites, are very useful.

What are my rights in relation to data processing?
Pursuant to the law, you always have the right to request access, rectification, erasure or restriction of processing of your data, to object to the processing of personal data and to receive the data in portable form. You also have the right to object to the use of your personal data for direct marketing purposes, including profiling.

You may submit your request related to the processing of your personal data to our company verbally (in person) or in writing (personally or by means of a document handed over by someone else, or by post, fax or electronic mail address) at the following contact addresses:

- Address of central customer service: 1062 Budapest, Delibab Street 29.
- Telephone number: +36-1-249-1051
- Central e-mail address: Info@positive.hu

We will evaluate your request for the enforcement of your entitlements within the shortest possible time, but not later than 25 days from the submission of it, and we will notify you of our decision in writing or, if you submitted the request electronically, electronically!

The prospectus refrains from repeating legislation in full and textually, in line with supervisory recommendations. The detailed rules are laid down in Chapter III of the GDPR entitled "Rights of data subjects" and in the Privacy Act. Contains.

Who can I contact with my questions or complaints related to data processing?
The Organization accepts questions and complaints related to data protection at the central contact details.

You have the right to initiate an investigation by a supervisory authority if you believe that the enforcement of your rights in relation to your personal data is restricted by our Company or your request to enforce these rights is rejected by our Company or you consider at any time that there has been an infringement or an imminent threat thereof in connection with the processing of your personal data.

Contact details of the Hungarian **National Authority for Data Protection and Freedom of Information**:

- Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

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- Postal address: 1530 Budapest, Pf. 5
- Phone: +36 1 391 1400
- Fax: +36 1 391 1410
- Email: ugyfelszolgalat@naih.hu
- Web: naih.hu

In addition, you have the right to a judicial remedy at any time against a legally binding decision of a supervisory authority concerning you or if the competent supervisory authority does not handle the complaint or does not inform it of the progress or outcome of the complaint lodged within three months.

You may also turn to court if you consider that our Company or the data processor entrusted by it or acting on its behalf processes your personal data in violation of the requirements for the processing of personal data specified by law or a binding act of the European Union. You may also bring the action before the court competent for your domicile or residence, if you choose.

Budapest, 13 November 2023.