

# **DATA PRIVACY POLICY of Decosya.com website**

## **1. INTRODUCTION**

This Privacy Notice applies to the processing of personal data related to the website of decosya.com. (hereinafter: Data Controller).

Visitors of the website acknowledge that it processes personal data related to the electronic interface of decosya.com as described below.

Providing personal data is required for registration, and it is also possible to contact us. It is necessary to process your personal data during registration for making payments and for providing the service.

If during the use of our service you feel that you have additional questions beyond what is contained in this Notice, or if any part of the Notice is not clear or needs clarification, please contact the staff member responsible for the protection of personal data at the e-mail address or telephone number provided below. Upon receiving your request, we will provide detailed information in each case in accordance with the contents of your request about the personal data processed, the purpose, legal basis, duration of data processing, and the activities related to the data processing.

## **2. DATA CONTROLLER DETAILS**

**Name of data controller:** Decosya OÜ

**Legal address:** Harju maakond, Kuusalu vald, Pudisoo küla, Männimäe/1, 74626

**Registration code:** 17039615

**EU VAT number:** EE102795828

**Mailing address:** info@decosya.com

**Data privacy officer:** Péter Szabó (Chief Executive Officer)

**Representative:** Péter Szabó (Chief Executive Officer)

## **3. DATA PROCESSING PRINCIPLES**

Natural and legal bodies using paid services on the Data Controller's website. In order to protect and respect the privacy of the Data Subjects, the Data Controller processes data in accordance with the applicable laws in force, with particular respect to Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information and Regulation 2016/679 of the European Parliament and the Council (27 April 2016) that is applicable from 25.05.2018. (General Data Protection Regulation, hereinafter: GDPR)

The Data Subject must clearly consent to any data processing operation for which consent is required. The consent is to be given by the Data Subject upon registration, by confirming acceptance of the privacy notice. The Data Controller disclaims any liability for damage or legal violations due to erroneous data or data entered intentionally incorrectly.

## **4. DATA SECURITY**

The Data Controller takes all necessary technical and organizational measures in order to ensure the security of the personal data provided during the entire data processing operation. During data processing, the Data Controller stores personal data in electronic form exclusively on its own internal servers. The Data Controller does not receive authorization or access to the Data Subject's portfolio in any manner.

## 5. DATA PROCESSING OPERATIONS

During the processing of data subject to registration, the Data Controller performs profiling in order to offer the Data Subject a strategy that best suits his/her investment attitude and portfolio. Automated decision-making does not take place because accepting the recommendations of the system is at the Data Subject's sole discretion.

### I. Contacts

Data is processed solely to enable contact with the data subject or subscription to a newsletter, or to respond to a specific message.

Purpose	Reply to inquiries
Legal basis	Paragraph (1) of Article 6 of the GDPR a) – the data subject's consent: contacting Data Processor is based on the voluntary consent of the User
Data	Full name, e-mail address, message, IP address
Retention period	until deletion requested
Source of data	Data Subject
Transmission of data	Transmit through server provider (see below)
Data processor	Server provider (see below)
Rights of Data Subjects	The data subject may exercise the following rights: Access, Rectification, Erasure, Restriction, Portability

### II. Registration

Data is processed solely to enable contact and maintain an account for the Data Subject.

Purpose	Maintain user account
Legal basis	Paragraph (1) of Article 6 of the GDPR b) – the data subject's consent: contacting Data Processor is based on the voluntary consent of the User
Data	Full name, e-mail address, password (encrypted), shipping and billing data, payment and purchase history, IP address, logs
Retention period	until deletion requested

Source of data	Data Subject
Transmission of data	Transmit through server provider (see below)
Data processor	Server provider (see below), Professional Services conducted (see below)
Rights of Data Subjects	The data subject may exercise the following rights: Access, Rectification, Erasure, Restriction, Portability

### III. Payments

Data is processed solely to enable contact with the Data Subject through the shipping and payment period and accounting it for legal purposes.

Purpose	Shipping ordered goods
Legal basis	Paragraph (1) of Article 6 of the GDPR c) – processing is necessary for compliance with a legal obligation to which the controller is subject;
Data	Full name, e-mail address, shipping and billing data, payment and purchase history, IP address
Retention period	no retention period: data storing is based on legal obligation
Source of data	Data Subject
Transmission of data	Transmit through server provider (see below); transmit through the shipping provider
Data processor	Server provider (see below), Professional Accounting Services conducted (see below)
Rights of Data Subjects	The data subject may exercise the following rights: Access, Rectification, Erasure, Restriction, Portability

### IV. Partner Registration

Data is processed solely to enable contact with the Data Subject through the shipping and payment period and accounting it for legal purposes.

Purpose	Maintaining account for partners; making Partner's able to sell virtual arts on Decosya platform
Legal basis	Paragraph (1) of Article 6 of the GDPR c) – processing is necessary for compliance with a legal obligation to which the controller is subject; a) – the data subject's consent: contacting Data Processor is based on the voluntary consent of the User

Data	Full name, e-mail address, billing data, payment history, internal messages, IP address, login history
Retention period	no retention period: data storing is based on legal obligation; deleting personal data is possible on request
Source of data	Data Subject
Transmission of data	Transmit through server provider (see below); transmit through the accounting provider
Data processor	Server provider (see below), Professional Accounting Services conducted (see below)
Rights of Data Subjects	The data subject may exercise the following rights: Access, Rectification, Erasure, Restriction, Portability

## 6. RECIPIENTS OF DATA

The data provided can only be seen by the Data Controller as well as by the employees of the Data Controller to the extent they need it for their work. Your personal data will not be transferred to third parties except where it is required by the law.

## 7. THE RIGHTS OF DATA SUBJECTS

### V. Right to access (Article 15 of the GDPR)

The Data Subject is entitled at any time to request information about the personal data relating to him/her that are being processed. At the request of the Data Subject, the Data Controller shall provide information on the processed personal data relating to the Data Subject, the purpose, legal basis and duration of the data processing, and the legal basis and recipients of any data transfer. The Data Controller shall provide the requested information in a reasonably understandable way in writing as soon as possible but no later than within a month after submission of the relevant request.

In addition to the above, the Data Subject is entitled to receive from the Data Controller the personal data disclosed by him/her, in a structured, commonly used and machine-readable format.

### VI. Right to rectification (Article 16 of the GDPR)

The Data Subject may request the rectification of any inaccurate personal data at any time, and the Data Controller shall comply with such request as soon as possible.

### VII. Right to erasure, right to be forgotten (Article 17 of the GDPR)

The Data Subject has the right to obtain from the data controller the erasure of their personal data without undue delay and the data controller shall be obliged to erase such personal data of the Data Subject without undue delay.

The Data Subject acknowledges that if this renders the performance of the service contract impossible, he/she must also terminate the contract.

The Data Controller does not have to erase the data if it is necessary to assert or protect its own lawful claims. (Point e) of Article 17(3) of the GDPR)

### **VIII. Right to restriction of processing (Article 18 of the GDPR)**

The Data Subject has the right to obtain from the Data Controller the restriction of processing.

The Data Subject acknowledges that if this renders the performance of the service contract impossible, he/she must also terminate the contract.

### **IX. Right to portability (Article 20 of the GDPR)**

The Data Subject has the right to receive the personal data concerning him/her, which he/she has provided to a Data Controller, in a structured, commonly used, and machine-readable format and has the right to transmit those data to another data controller. Except where the Data Controller processes the data for its own legitimate interests. (Data processing due to financial claims.)

The Data Controller engage a data processor during the provision of the service to provide services to the end clients.

## **8. LIST OF COOKIES**

The Data Controller uses cookies in order to maintain the Website and its related services (such as Partner Portal), and also to measure the website and track the user behavior of the visitors.

Below table contains the name of the cookie, purpose and validity.

Name of Cookie	Purpose	Validity
PHP_SESSID	User session-based authentication	after closing

## **9. DATA SUBPROCESSORS**

The Data Controller operates with Data Sub Processors, in order to outsource some services, as well as to maintain the website.

Purpose	Data Subprocessor
Server hosting and storage, development and maintenance of the website	<b>WebOrigo Magyarország Zrt.</b> (2161 Csomád, Szent István utca 48., Hungary)

Server hosting and storage	<b>Shopify Ltd.</b> (151 O'Connor Street, Ground floor, Ottawa, ON, K2P 2L8)
Marketing Activities	<b>Rocket Science Group LLC</b> (405 N Angier Avenue NE, Atlanta, GA, 30308, USA)
Analytics Services (Google Analytics)	<b>Google Ireland Ltd.</b> (Gordon House, Barrow Street, Dublin 4, Ireland)
Analytics Services (Microsoft Clarity)	<b>Microsoft EMEA Ltd.</b> (South County Business Park, One Microsoft Place, Carmanhall And Leopardstown, Dublin, D18 P521, Ireland)
Accounting and Professional consultancy services	<b>Nordic Consult Worldwide OÜ</b> (Harju maakond, Kuusalu vald, Puidisoo küla, Männimäe/1, 74626, Estonia)
Accounting and Professional consultancy services	<b>Neopixel Kft.</b> (8200 Veszprém, Kertalja utca 9., Hungary)
Manufacturing Custom Goods	<b>Poszterfotó Számítástechnikai Szolgáltató Kft.</b> (1145 Budapest, Amerikai út 56., Hungary)
Manufacturing Custom Goods	<b>Pictorem Inc.</b> (9 rue de la Place-du-Commerce bureau T Brossard, QC, J4W 2V6 Canada)
Shipping of Goods	<b>Pigmenta Art Print Lab</b> (1145 Budapest, Amerikai út 56., Hungary)
Shipping of Goods	<b>Pictorem Inc.</b> (9 rue de la Place-du-Commerce bureau T Brossard, QC, J4W 2V6 Canada)

## 10. LEGAL REMEDY

If you consider that your rights related to the processing of your personal data have been violated, you may contact the Data Controller with your questions or for legal remedy at the contact details provided above.

Puidisoo küla, 1st January, 2025