

Users privacy policy

Intueri Product Ltd. with registered office in 1.Szolnoki way Kecskemét 6000 Hungary. **VAT No.** HU26126214 (hereinafter, the “**Controller**”), in quality of **controller of the personal data** of the users registered at the newsletter (hereinafter the “**Users**”) provides the following Privacy Policy in accordance with article 13 of the EU Regulation 2016/679 of April 27th 2016 (hereinafter the “**Regulation**” or “**Applicable Regulation**”).

Only subjects aged over 18 may subscribe to the newsletter. Thus, the Controller shall not collect personal data from subjects under the age of 18. Upon the Users’ request, the Controller shall cancel with no further ado all the personal data involuntarily collected regarding subjects under the age of 18.

The Controller recognizes the importance of its Users’ privacy and their personal information and commits to respect it. With regards to this privacy policy, the Users can contact the Controller at any moment as following:

- By sending registered letter with acknowledgement of receipt at the registered office address;
- By sending an email at the following address: info@intuerilight.com

The Controller did not appoint a Data Protection Officer as it is not subject to such obligation foreseen in article 37 of the Regulation.

Purposes of Data Processing

The Users’ personal data shall be rightfully processed by the Controller in compliance with article 6 of the Regulation for the following purposes:

- a. **execution of the requested service and performance of market research**: the Users’ personal data are collected and processed by the Controller for the sole purpose of executing the request of the latter regarding the diffusion of the newsletter and of the market research fulfilment. Thus the User shall receive from the Controller a periodic newsletter containing information, updates and news with regards to the Controller’s activities. The Consumer’s data collected by the Controller for this purpose will include: at the email address: info@intuerilight.com.
- b. No further processing the Consumers’ personal data shall be executed by the Controller. Without prejudice to the provisions stated elsewhere in this Privacy Policy, the Controller will not disclose the Users’ personal data to other Users and/or third parties.
- c. **administrative and accounting purposes**, that is to fulfil organizational, administrative, financial and accounting activities, such as internal organizational activities and following contractual and pre-contractual obligations’ fulfilment activities;

- d. **legal obligations**, that is to fulfil the obligations provided for by the law, by an authority or by a regulation or an European legislation.

The provision of personal data for the purposes listed above is optional but necessary; in the lack of provision of the same, the User will not be able to receive the newsletter from the Controller. In case of consent, the User will have the right to revoke it at any moment, by means of request to the Controller as per the following paragraph 4.

Furthermore the User will have the right to cease the receiving of further newsletters by clicking the link revoking the consent, included in every email containing the newsletter. Once the consent is revoked, the Controller will send to the User an email confirming the completed revoke of the consent. The personal data necessary for the prosecution of the purposes of the treatment listed in this paragraph 1 are marked with asterisk on the request form.

Means and period of data processing and storage

The Controller will carry out the Users' personal data processing using paper-based and electronic methods with reasons strictly connected to the same purposes in order to ensure maximum security and confidentiality of the same.

The Users' personal data will be kept for a period not exceeding the purposes for which the data was collected and subsequently processed, as per paragraph 1 above, and for as long as necessary for the protection of the interests according to the civil law of both the Users and the Controller.

Communication environment and data disclosure

The Users' Personal Data will be accessible to the staff members and/or collaborators of the Controller in their quality as persons in charge of the processing of the Users' requests. These subjects, who have been instructed for this purpose by the Controller in accordance with the article 29 of the Regulations, will commit to use the information received only for purposes of processing specified above, to keep them confidential and secure and to comply with the protection of Personal Data required by law.

Users' Personal Data may also be disclosed to third parties who will process such data on behalf of the Controller in their quality of "External Data Processors" such as third party suppliers of IT service and logistics, outsourcing or cloud computing service suppliers, professional service suppliers.

The complete and updated list of Data Processors nominated by the Controller will be provided to the Users upon request to the Controller by means stated at the following paragraph 4.

Users' Rights

1. The Users may exercise the rights which they are entitled to pursuant to the Applicable Law, by contacting the Controller as follows:
 - a. by sending registered letter with acknowledgement of receipt at the registered office of the Controller;
 - b. by sending an email at the following address: info@intuerilight.com.
2. In compliance with the Applicable Law, the Controller informs that the Users have the right to obtain confirmation (i) of the source of the personal data; (ii) of the processing purposes and methods; (iii) of the algorithm applied in case of data processing accomplished by means of electronic devices (iv) of the Controller's and officers' identification details; (v) of the subjects or of the categories of subjects to which the personal data may be disclosed in their quality of Data Processors.

Furthermore, the Users have the right to obtain the following:

- a. **access, update and rectification**, or, in case of interest, **integration** of personal data,
 - b. **deletion, transformation into an anonymous form** or the **arrest** of the personal data processed in contravention of the law, including the data unnecessarily stored for the purposes that required their collection and subsequent processing;
 - c. **ascertainment** that the operations stated at letters a) and b) have been brought to attention, regarding their content also, by the subjects to whom the data were disclosed, exception made the case in which this obligation becomes impossible or implies a greater number of means involved compared to the enforceable right.
3. Furthermore, the Users have the following rights:
 - a. the right to **revoke the consent** at any time, in case the data processing is based on their consent (even through simplified methods stated in paragraph 1);
 - b. right to **data portability** (the right to receive personal data in a structured, commonly used and machine-readable format), the right to ask for the restriction of the data processing and the right to deletion ("right of oblivion);
 - c. right to object:
 - i. in whole or in part, for legitimate reasons to processing their personal data, albeit the collection purpose;
 - ii. in whole or in part, to processing their personal data for the purposes of receiving commercial and / or promotional communications on products and services and to perform market research or commercial communication;

- iii. in case the personal data are processed for the purposes of direct marketing, at any moment, to the processing their data carried out for this purpose, including the profiling in so far as connected to such direct marketing.
- d. in case they consider that their data processing infringes the Regulation, the right to contact the national competent data protection authority and **lodge complaint** (in the competent EU State in which they have residence, in which they work or in which the alleged infringement occurred).

The Controller is not held liable for the update of all the links contained in this Privacy Policy, therefore each time a link malfunctions and / or is not updated, the Users acknowledge and accept that they will have to make reference to the document and / or the section of the websites cited in the same link.