

# Privacy Policy

## PRIVACY POLICY

**Effective from:** 29 May 2026

**Website / webshop:** furdoszoba-szaniter.hu

**Data Controller:** AXO saniter Kft.

The purpose of this Privacy Notice is to provide clear and understandable information to the visitors, customers, interested parties and clients of the furdoszoba-szaniter.hu webshop about what personal data AXO saniter Kft. processes, for what purpose, on what legal basis, for how long and in what manner.

AXO saniter Kft. processes personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council – the General Data Protection Regulation, GDPR – and the applicable Hungarian laws.

### 1. Details of the Data Controller

**Name of Data Controller:** AXO saniter Kft.

**Registered seat:** 1223 Budapest, Dallam utca 18. 2., Hungary

**Showroom / shop / customer service:** 1131 Budapest, Reitter Ferenc utca 163., Hungary

**Company registration number:** 01-09-903553

**Tax number:** 14429493-2-43

**EU VAT number:** HU14429493

**E-mail:** [axo@axosaniter.hu](mailto:axo@axosaniter.hu)

**Telephone:** +36 1 555 1490

**Website:** <https://furdoszoba-szaniter.hu>

**Managing directors:** Jelinek Péter, Kleisz Ádám

AXO saniter Kft. is not required to appoint a data protection officer. Any data protection-related question, request or complaint may be submitted to the following e-mail address: [axo@axosaniter.hu](mailto:axo@axosaniter.hu).

### 2. Scope of this Privacy Notice

This Privacy Notice covers the following data processing activities:

visiting the furdoszoba-szaniter.hu website;  
registration and use of a user account;  
requests for quotation;  
webshop orders;  
invoicing;  
payment;  
delivery and personal collection;  
customer service communication;  
complaints, withdrawal, warranty and guarantee administration;  
newsletter and marketing communications;  
use of cookies and online measurement / marketing tools;  
use of social media platforms.

### 3. Principles

When processing personal data, AXO saniter Kft. follows the principles below:

personal data are processed lawfully, fairly and transparently;  
data are collected only for specified, explicit and legitimate purposes;  
only data necessary for the given purpose are processed;  
AXO saniter Kft. endeavours to keep the data accurate and up to date;  
data are retained only for the period necessary;  
data are protected by appropriate technical and organisational measures;  
the lawfulness of data processing can be demonstrated when necessary.

### 4. Individual data processing activities

#### 4.1. Website visits

When visiting the website, technical data may be generated which are necessary for the secure and proper operation of the website.

**Categories of processed data:**

IP address;  
time of visit;  
browser type;  
type of device used;  
operating system;  
pages viewed;  
technical log data.

**Purpose of data processing:**

Secure operation of the website, prevention and elimination of technical errors, prevention of misuse, and maintenance of IT security.

**Legal basis:**

Article 6(1)(f) GDPR — the legitimate interest of the Data Controller.

**Legitimate interest:**

The secure, stable and proper operation of the website.

**Retention period:**

As a general rule, AXO saniter Kft. retains technical log data for a maximum of 12 months, unless longer retention is necessary due to a security incident, misuse or legal dispute.

#### 4.2. Registration and user account

In the webshop, the customer may create a registration, which facilitates ordering and later administration.

**Categories of processed data:**

name;  
e-mail address;  
telephone number;

billing address;  
delivery address;  
password in encrypted form;  
order history;  
settings related to the user account.

**Purpose of data processing:**

Creating and maintaining a user account, enabling login, managing order data, and simplifying the purchasing process.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract and taking steps prior to entering into a contract.

In the case of certain convenience functions, Article 6(1)(a) GDPR — consent.

**Retention period:**

Until the user account exists, or until the deletion request is fulfilled. Data related to orders, invoicing or legal claims may only be deleted after the expiry of the statutory retention periods.

**Consequence of failure to provide data:**

Registration or creation of a user account is not possible.

### 4.3. Requests for quotation and enquiries

An interested party may request a quotation or ask a question by e-mail, telephone, via the website, through social media or through other contact channels.

**Categories of processed data:**

name;  
e-mail address;  
telephone number;  
content of the enquiry or request for quotation;  
specified products, quantities and requirements;  
other data provided voluntarily.

**Purpose of data processing:**

Contact, providing quotations, providing information and responding to enquiries.

**Legal basis:**

Article 6(1)(b) GDPR — taking steps prior to entering into a contract.

If the enquiry does not lead to a contract, the legal basis of data processing may be Article 6(1)(f) GDPR — legitimate interest.

**Legitimate interest:**

Responding to enquiries and documenting business communication.

**Retention period:**

A maximum of 2 years from the closure of the request for quotation or enquiry, unless it results in an order, legal dispute or accounting obligation.

### 4.4. Performance of webshop orders

AXO saniter Kft. processes the customer's data in order to fulfil orders placed in the webshop.

**Categories of processed data:**

name or company name;  
billing address;  
delivery address;  
e-mail address;  
telephone number;  
tax number, if required;  
order number;  
ordered products;  
purchase price, advance payment and payment data;  
chosen payment and delivery method;  
communication related to the order.

**Purpose of data processing:**

Processing the order, creating and performing the contract, maintaining contact, handling payment, handing over or delivering the product, and handling complaints and legal claims.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract.

**Retention period:**

Until the end of the general civil law limitation period following performance of the contract, generally 5 years. In the case of data related to invoicing and accounting documents, the retention period prescribed by accounting laws applies.

**Consequence of failure to provide data:**

The order cannot be processed or fulfilled.

### 4.5. Invoicing and accounting obligations

AXO saniter Kft. issues an invoice for the purchase in accordance with the law.

**Categories of processed data:**

billing name;  
billing address;  
tax number, if required;  
order data;  
products and prices;  
payment data;  
invoice number;  
date of performance and date of issue.

**Purpose of data processing:**

Issuing invoices and fulfilling accounting and tax obligations.

**Legal basis:**

Article 6(1)(c) GDPR — compliance with a legal obligation.

**Retention period:**

The statutory retention period applicable to accounting documents, generally 8 years.

#### 4.6. Payment processing

The customer may use various payment methods in the webshop or in the case of personal collection.

**Categories of processed data:**

name;  
order identifier;  
amount payable;  
payment method;  
payment status;  
transaction identifier;  
technical data returned by the payment service provider in the case of bank card payment.

As a general rule, AXO saniter Kft. does not process or store bank card data; in the case of bank card payment, data processing takes place in the secure system of the payment service provider.

**Purpose of data processing:**

Processing payment, identifying payment, fulfilling the order, financial and accounting settlement.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract.

In the case of accounting data, Article 6(1)(c) GDPR — compliance with a legal obligation.

**Retention period:**

According to the contractual and accounting retention periods.

**Processor / recipient:**

OTP SimplePay, Novopayment, and the relevant bank or payment service provider.

AXO saniter Kft. does not store bank card data; bank card payment is made through the secure system of the payment service provider.

#### 4.7. Delivery

Delivery of the ordered products is carried out by a carrier, courier service or logistics partner independent of AXO saniter Kft.

**Categories of processed data:**

recipient's name;  
delivery address;  
telephone number;  
e-mail address;  
order identifier;  
package size, weight and number of packages;  
information related to delivery.

**Purpose of data processing:**

Delivery of the ordered product, coordination of delivery, confirmation of receipt, and handling delivery-related complaints.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract.

**Retention period:**

Until completion of the delivery, or until the end of the limitation period for claims arising from the contract or delivery.

**Processor / recipient:**

Express One Hungary Kft., Trans-Pack Kft., and any other carrier or courier service partner used for the performance of the given order.

#### 4.8. Personal collection

In the case of personal collection, AXO saniter Kft. processes the data necessary for carrying out and verifying the handover.

**Categories of processed data:**

name;  
order identifier;  
billing data;  
time of collection;  
data appearing on the handover document;  
contact details.

**Purpose of data processing:**

Handover of the product, confirmation of receipt, fulfilment of the order, and handling any subsequent complaints.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract.

In disputed cases, Article 6(1)(f) GDPR — legitimate interest.

**Legitimate interest:**

Proving performance and receipt, and asserting or defending legal claims.

**Retention period:**

Until the end of the contractual limitation period for claims, generally 5 years.

#### 4.9. Withdrawal, complaints, warranty and guarantee

AXO saniter Kft. processes personal data for the administration of withdrawal, complaints, implied warranty, product warranty and guarantee matters.

**Reporting platforms:**

Withdrawal:

<https://furdoszoba-szaniter.hu/elallas>

Complaint:

<https://furdoszoba-szaniter.hu/reklamacio>

E-mail:

[axo@axosaniter.hu](mailto:axo@axosaniter.hu)

**Categories of processed data:**

name;  
e-mail address;  
telephone number;  
address;  
order number;  
invoice data;  
product name;  
description of the defect, damage or complaint;  
photographs, videos and documents;  
reports;  
withdrawal statement;  
bank account number, if required for reimbursement;  
correspondence and documents generated during administration.

**Purpose of data processing:**

Handling withdrawal statements, investigating complaints, assessing warranty and guarantee claims, making reimbursements, fulfilling legal obligations, and asserting or defending legal claims.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract.  
Article 6(1)(c) GDPR — compliance with a legal obligation.  
Article 6(1)(f) GDPR — legitimate interest.

**Legitimate interest:**

Investigating complaints, proving performance, and asserting, enforcing or defending legal claims.

**Retention period:**

Until the end of the general limitation period for claims following the closure of the complaint, withdrawal or claim, generally 5 years. In matters involving accounting documents, the accounting retention period applies.

#### 4.10. Customer service communication

AXO saniter Kft. may communicate with customers by e-mail, telephone, in person, through web platforms or via social media.

**Categories of processed data:**

name;  
e-mail address;  
telephone number;  
content of the message;  
order or request-for-quotation data;  
information generated during administration.

**Purpose of data processing:**

Maintaining contact, answering questions, administration and handling customer issues.

**Legal basis:**

Article 6(1)(b) GDPR — performance of a contract or taking steps prior to entering into a contract.  
Article 6(1)(f) GDPR — legitimate interest.

**Legitimate interest:**

Providing customer service communication and documenting administration.

**Retention period:**

A maximum of 2 years from the closure of the case, unless the communication is related to a contract, complaint, legal dispute or accounting document. In such cases, the retention period applicable to the given matter shall apply.

#### 4.11. Personalised offers and marketing automation

If AXO saniter Kft. uses a marketing automation system that sends personalised or interest-based offers based on activity performed on the website, it shall provide separate information about this.

**Categories of processed data:**

e-mail address;  
activity performed on the website;  
products viewed;  
clicks;  
cart and purchase data;  
newsletter opening and click data;  
interest categories.

**Purpose of data processing:**

Sending personalised offers, relevant product information, reminders and marketing messages.

**Legal basis:**

Article 6(1)(a) GDPR — consent.

**Retention period:**

Until withdrawal of consent or unsubscribing.

**Important:**

Such tracking and automated marketing may only be used with appropriate cookie consent, newsletter consent and proper prior information.

#### 4.12. Social media

AXO saniter Kft. may be present on social media platforms such as Facebook, Instagram, YouTube, TikTok or other platforms.

**Categories of processed data:**

username;  
public profile data;  
comments;  
messages;  
reactions;  
other data voluntarily provided by the data subject.

**Purpose of data processing:**

Maintaining contact, providing information, marketing communication and answering customer questions.

**Legal basis:**

Article 6(1)(f) GDPR — legitimate interest.

In the case of enquiries made in private messages, Article 6(1)(b) GDPR may also apply if the enquiry is related to a contract or to steps prior to entering into a contract.

**Legitimate interest:**

Maintaining the company's online presence, customer communication and marketing communication.

**Retention period:**

According to the rules of the social media platform, or, in the case of messages processed by AXO saniter Kft., for a maximum of 2 years from the closure of the matter, unless longer retention is necessary due to a legal dispute or contractual matter.

**Important:**

Social media platforms may also process personal data as independent data controllers. The privacy notice of the relevant platform applies to such processing.

## 5. Cookies and similar technologies

The furdoszoba-saniter.hu website may use cookies and similar technologies.

A cookie is a small data file saved by the browser on the user's device. Cookies may help the operation of the website, cart handling, login, remembering user settings, statistical measurement and marketing activity.

### 5.1. Necessary cookies

**Purpose:**

Ensuring the basic operation of the website, cart operation, login, session management and remembering data processing settings.

**Legal basis:**

Article 6(1)(f) GDPR — legitimate interest, and the use of cookies strictly necessary for providing the service under electronic communications rules.

**Consent:**

No separate consent is required for these cookies.

### 5.2. Functional cookies

**Purpose:**

Providing convenience functions and remembering user settings.

**Legal basis:**

Article 6(1)(a) GDPR — consent, if the cookie is not strictly necessary for the operation of the service.

### 5.3. Statistical cookies

**Purpose:**

Measuring traffic data, analysing website use and improving user experience.

**Legal basis:**

Article 6(1)(a) GDPR — consent, if the measurement is not exclusively anonymous and is not strictly necessary.

**Possible service providers:**

Google Analytics or another analytics service provider.

### 5.4. Marketing cookies

**Purpose:**

Measuring advertisements, remarketing, personalised offers and campaign effectiveness measurement.

**Legal basis:**

Article 6(1)(a) GDPR — consent.

**Possible service providers:**

Google Ads, Meta / Facebook Pixel, TikTok Pixel or another advertising service provider, if such tools actually operate on the website.

### 5.5. Modifying cookie settings

The visitor may modify or withdraw cookie consent at any time through the website's privacy / cookie settings, and may delete cookies in the browser settings.

Statistical, marketing and personalisation cookies are used only on the basis of the data subject's prior consent. The visitor may modify or withdraw consent at any time through the website's cookie settings.

## 6. Processors and recipients

AXO saniter Kft. may use processors and service providers during its operation. Processors act on behalf of and according to the instructions of AXO saniter Kft.

**Webshop system**

Service provider: UNAS Online Kft.

Processed data: order, registration and technical data.

Purpose: operation of the webshop.

**Hosting / technical operation**

Service provider: UNAS Online Kft.

Processed data: technical data and website data.

Purpose: operation of the website.

**Invoicing**

Service provider: AXEL Professional Softwares Kft.

Processed data: billing data.

Purpose: issuing invoices.

**Accounting**

Service provider: Brillconto Kft.

Processed data: invoices and accounting documents.

Purpose: accounting obligations.

**Bank card payment**

Service provider: OTP SimplePay, Novopayment

Processed data: payment transaction data.

Purpose: processing payments.

#### **Banking service**

Service provider: OTP Bank, BINX  
Processed data: payment data.  
Purpose: financial performance.

#### **Delivery**

Service provider: Express One Hungary Kft., Trans-Pack Kft.  
Processed data: name, address, telephone number, e-mail address and package data.  
Purpose: delivery.

#### **Analytics**

Service provider: Google Analytics  
Processed data: online identifiers and visit data.  
Purpose: statistics.

#### **Online advertising**

Service provider: Google Ads, Meta, TikTok  
Processed data: online identifiers and campaign data.  
Purpose: marketing.

#### **Customer service communication**

Service provider: Google Gmail  
Processed data: e-mails and messages.  
Purpose: communication.

AXO saniter Kft. transfers personal data to an authority, court or other state body only if required by law or if the data disclosure is lawfully necessary on the basis of an official request.

### **7. Transfers to third countries**

As a general rule, AXO saniter Kft. processes personal data within the European Economic Area.

In the case of certain online service providers — such as Google, Meta, TikTok or other technology service providers — personal data may be transferred to countries outside the European Economic Area.

In such cases, the transfer may take place in accordance with the GDPR, subject to appropriate safeguards, for example on the basis of an adequacy decision, standard contractual clauses or another lawful transfer mechanism.

### **8. Automated decision-making and profiling**

AXO saniter Kft. does not apply exclusively automated decision-making that would have legal effects concerning the data subject or would similarly significantly affect the data subject.

If AXO saniter Kft. uses interest-based personalised content for newsletters, marketing automation or advertising, this does not result in automated decision-making with legal effect. The data subject may withdraw consent at any time and may object to data processing for direct marketing purposes.

### **9. Data security**

AXO saniter Kft. applies appropriate technical and organisational measures to protect personal data, in particular against unauthorised access, alteration, transfer, disclosure, deletion, damage or loss.

AXO saniter Kft. makes the data accessible only to authorised employees and contributors, to the extent necessary for the performance of their duties.

AXO saniter Kft. also expects processors to apply appropriate data security measures.

### **10. Rights of data subjects**

The data subject may exercise the following rights by contacting AXO saniter Kft.

#### **10.1. Right of access**

The data subject is entitled to request information as to whether AXO saniter Kft. processes their personal data and, if so, what data are processed, for what purpose, on what legal basis, for how long and to whom they are transferred.

#### **10.2. Right to rectification**

The data subject may request the rectification of inaccurate personal data and the completion of incomplete data.

#### **10.3. Right to erasure**

The data subject may request the erasure of their personal data if the purpose of processing has ceased, the processing is unlawful, the data subject has withdrawn consent, or another statutory condition for erasure exists.

Erasure cannot be fulfilled if the processing is necessary for compliance with a legal obligation, performance of a contract, or the establishment, exercise or defence of legal claims.

#### **10.4. Right to restriction of processing**

The data subject may request restriction of processing if they contest the accuracy of the data, the processing is unlawful, the Data Controller no longer needs the data but the data subject requests their retention for legal claims, or the data subject has objected to the processing.

#### **10.5. Right to data portability**

The data subject is entitled to receive the personal data concerning them, which they have provided, in a structured, commonly used and machine-readable format, if the processing is based on consent or on a contract and is carried out by automated means.

#### **10.6. Right to object**

The data subject is entitled to object to processing based on legitimate interest. In such a case, AXO saniter Kft. may no longer process the data, unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or which are related to the establishment, exercise or defence of legal claims.

In the case of direct marketing, the data subject may object to the processing at any time. In such a case, the data may no longer be processed for this purpose.

#### **10.7. Withdrawal of consent**

If the processing is based on consent, the data subject may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

## 11. Submitting data subject requests

The data subject may submit requests related to data processing using the following contact details:

**E-mail:** [axo@axosaniter.hu](mailto:axo@axosaniter.hu)

**Postal address:** 1223 Budapest, Dallam utca 18. 2., Hungary

**Telephone:** +36 1 555 1490

**In person:** 1131 Budapest, Reitter Ferenc utca 163., Hungary

AXO saniter Kft. shall respond to the data subject's request without undue delay, but no later than within 1 month from receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further 2 months.

## 12. Remedies

The data subject may primarily contact AXO saniter Kft. with any question or complaint related to data processing at [axo@axosaniter.hu](mailto:axo@axosaniter.hu).

If the data subject believes that the processing of their personal data is unlawful, they may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

**Hungarian National Authority for Data Protection and Freedom of Information – NAIH**

**Address:** 1055 Budapest, Falk Miksa utca 9-11., Hungary

**Postal address:** 1363 Budapest, P.O. Box 9, Hungary

**E-mail:** [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

**Telephone:** +36 1 391 1400

**Website:** <https://www.naih.hu>

If the data subject's rights are infringed, they may also turn to a court. The lawsuit may also be initiated before the tribunal competent according to the data subject's place of residence or place of stay, at the data subject's choice.

## 13. Personal data breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data processed.

AXO saniter Kft. investigates any personal data breach without undue delay. If the breach is likely to result in a risk to the rights and freedoms of natural persons, AXO saniter Kft. shall notify the NAIH within the statutory deadline. In the event of a high risk, AXO saniter Kft. shall also inform the data subjects.

## 14. Amendment of this Privacy Notice

AXO saniter Kft. is entitled to amend this Privacy Notice.

The amended Privacy Notice enters into force upon publication on the website.

AXO saniter Kft. endeavours to ensure that the Privacy Notice is always up to date, understandable and in line with the actual data processing practice.

This English version is a translation of the Hungarian Privacy Notice. In the event of any discrepancy, interpretation issue or legal dispute, the Hungarian language version shall prevail.