

PRIVACY NOTICE

BillionHerbs.eu

1. Identification of the Data Controller

The online store available at <https://billionherbs.eu/> is operated by:

KONRÁD - Solutions Korlátolt Felelősségű Társaság

Abbreviated name: KONRÁD - Solutions Kft.

Company registration number: 07-09-026248 – Company Court of the Székesfehérvár Regional Court

Tax number: 25362073-2-07

Registered office: 2063 Óbarok, Vázsony puszta 11., Hungary

Place of business: 2837 Vértesszőlős, Határ út 014/38 hrsz. (B&T Terminál Kft. Office Building), Hungary

Telephone: +36 20 272 2510; +36 20 293 7775

E-mail: info@billionherb.eu

Website: <https://billionherbs.eu/>

(hereinafter: the “Data Controller”).

2. Applicable Data Protection Legislation and Scope of this Notice

2.1. The Data Controller processes Users’ personal data primarily in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and Act CVIII of 2001 on electronic commerce services and information society services, together with other applicable Hungarian and European Union legislation.

2.2. This Privacy Notice applies to personal-data processing carried out in connection with the use of <https://billionherbs.eu/>, the services and functions available on the website, and the performance of orders placed through the online store.

2.3. For the purposes of this Notice, “User” means a natural person browsing the website or using its services or functions and whose personal data are processed.

3. Data Processing Related to the Operation of Information Technology Services

3.1. The Data Controller uses cookies for operation of the website and for collecting technical information relating to website visitors.

3.2. Detailed information about data processing through cookies is provided in the separate Cookie Notice published on the website.

4. Processing Related to Receiving and Answering Messages

4.1. Data subjects: Users who contact the Data Controller by e-mail using an address published on the website.

4.2. Legal basis: consent under Article 6(1)(a) GDPR. Consent is given by sending the e-mail and may be withdrawn at any time without affecting the lawfulness of processing carried out before withdrawal.

4.3. Data processed:

- name of the sender
- e-mail address
- subject and content of the message
- information and conclusions that may be derived from the message

4.4. Purpose: enabling communication between the User and the Data Controller.

4.5. Retention: until the message has been answered or the User's request has been fulfilled. If the correspondence results in a contract, the rules applicable to order-related processing apply. Complaints are processed under Section 12.

4.6. Storage: electronically in the Data Controller's information systems.

4.7. Consequence of failure to provide data: the Data Controller may be unable to answer the message.

5. Processing Related to Newsletters

5.1. Data subjects: Users who voluntarily subscribe to the newsletter through the website.

5.2. Legal basis: consent under Article 6(1)(a) GDPR, taking account of the applicable Hungarian rules on direct marketing. Subscription is voluntary and is not a condition for using other services.

5.3. Data processed: e-mail address; IP address of the device used for subscription; date and time of subscription.

5.4. Purpose: sending newsletters, information about products, news and updates, promotional offers, advertising and sales-promoting content.

5.5. Retention: until withdrawal of consent/unsubscription or deletion at the User's request.

5.6. Storage: electronically in a separate data set within the Data Controller's systems.

5.7. Without the necessary data, newsletters cannot be sent.

6. Processing Related to Orders Placed by Natural Persons

6.1. Data subjects: natural-person Users placing orders on the website.

6.2. Legal basis: Article 6(1)(b) GDPR, as processing is necessary for performance of a contract to which the User is a party.

6.3. Data processed:

- surname and first name
- business name, where applicable
- billing address
- telephone number
- e-mail address
- delivery address
- ordered product(s) and purchase price

- method of receipt/delivery
- payment method
- other information supplied for performance of the order
- date/time of order and payment

6.4. Purpose: conclusion and performance of the sales contract created by the order.

6.5. Retention: contractual data are generally retained until expiry of the limitation period for contractual claims, normally 5 years from the due date. Data necessary for delivery are processed for the period necessary to complete delivery. Accounting records are retained for at least 8 years as required by Hungarian accounting law, after which the data are deleted within one year.

6.6. Storage: electronically in the Data Controller's systems and, where required for accounting, in accounting records.

6.7. The data are necessary to perform the order; without them the Data Controller cannot fulfil the order.

7. Processing of Personal Data of Representatives Acting on Behalf of Business Organisations

7.1. Data subjects: natural persons contacting the Data Controller or placing orders on behalf of a business organisation.

7.2. Legal basis: Article 6(1)(f) GDPR – the legitimate interest of the represented organisation in communicating, entering into and performing a contract through its representative.

7.3. Data processed include the representative's name, e-mail address and telephone number; and, for orders, the represented organisation's legal form, name, postal and billing address, tax/VAT number and company registration number, together with order, delivery and payment data.

7.4. The data normally originate from the User; if another person within the represented organisation provides the representative's data, that organisation is responsible for informing the representative.

7.5. Purpose: communication and conclusion/performance of contracts with the represented organisation.

7.6. Retention: correspondence not resulting in a contract is deleted after the communication/request is completed. Contract-related data are generally retained for the applicable 5-year limitation period; accounting records are retained as required by law.

7.7–7.8. Data are stored electronically and, where required, in accounting records. Without the necessary personal data, communication and order performance cannot take place.

8. Application to Become a Business Partner – Sole Traders and Tax-Registered Private Individuals

8.1. The website may provide a "Become our reseller" application function. The conditions of reseller status are agreed separately.

8.2. Data subjects: sole traders and tax-registered private individuals applying to become business partners.

8.3. Legal basis: Article 6(1)(b) GDPR, including steps taken at the data subject's request before entering into a contract.

8.4. Data processed: name, telephone number, business name and form, and the name and address of the store.

8.5. Purpose: enabling and assessing the business-partner application.

8.6. Retention: if no contract is concluded, until the application has been answered; if a contract is concluded, generally until expiry of the contractual limitation period, normally 5 years after the relevant claim becomes due.

8.7–8.8. Data are stored electronically. Without the necessary data the application cannot be assessed.

9. Business-Partner Applications Submitted by Representatives of Partner Organisations

9.1–9.2. This section applies to natural persons applying for reseller/business-partner status on behalf of an organisation.

9.3. Legal basis: Article 6(1)(f) GDPR – the legitimate interest of the partner organisation in applying for and obtaining partner status.

9.4. Data processed: representative's name and telephone number; represented business's name and legal form; name and address of the represented store.

9.5. Data source: normally the User; where another person at the organisation supplies the representative's data, the organisation must inform the representative.

9.6. Purpose: enabling the business-partner application.

9.7–9.9. Retention and storage follow the same principles described in Section 8. Without the required data, the application cannot be assessed.

10. Processing Related to Refunds (Withdrawal, Warranty and Guarantee Claims)

10.1–10.3. Where a refund is requested, including by bank transfer, the legal basis is Article 6(1)(c) GDPR because processing is necessary to comply with the Data Controller's legal obligations.

10.4. Data processed may include: refund amount and legal basis, User's name, bank-account number where required, order identifier and date, affected product(s) and price, delivery method and fee, payment method and payment date.

10.5. Purpose: fulfilment of statutory obligations relating to refunds arising from withdrawal, statutory warranty or guarantee rights.

10.6. Retention: generally for the applicable 5-year limitation period; accounting documents relating to refunds are retained for at least 8 years as required by law.

10.7–10.8. Data are stored electronically and in accounting records where required. Without the necessary data the refund cannot be processed.

11. Processing Related to Retention of Accounting Documents

11.1–11.2. Data subjects are Users placing orders. Legal basis: Article 6(1)(c) GDPR – compliance with legal obligations.

11.3. Data may include name, billing and delivery addresses, telephone number, e-mail address, ordered goods and price, delivery method, payment method, other order information, and order/payment dates.

11.4. Purpose: compliance with invoice-issuing and accounting-record retention obligations under Hungarian VAT and accounting legislation.

11.5. Retention: at least 8 years from issuance of the accounting document, followed by deletion within one year after the statutory retention period expires.

11.6–11.7. Data are stored electronically and/or in accounting documents. Required accounting data must be provided in order for the Data Controller lawfully to sell and invoice the product.

12. Processing Related to Consumer Complaints

12.1–12.2. Data subjects are Users submitting consumer complaints. Legal basis: Article 6(1)(c) GDPR and the Data Controller's legal obligations under Hungarian consumer-protection law.

12.3. Data processed may include the complainant's name and address, details and content of the complaint, supporting documents/evidence, place and date of the complaint record, signature where applicable, e-mail address, telephone number and complaint identifier, relevant order/transaction information and the reason for rejection where applicable. Telephone calls are not recorded.

12.4. Data source: the User and, where necessary, the Data Controller's existing order records.

12.5. Purpose: investigating and answering the complaint and complying with legal complaint-handling obligations.

12.6. Complaint records, written complaints and replies are retained for 3 years. Other communications are retained for the periods described in the source Notice depending on whether they relate to a contractual transaction.

12.7–12.8. Data may be stored electronically and, depending on the method of submission, on paper. Without the necessary data, the complaint may not be investigated or remedied.

13. Processing Related to Warranty/Guarantee Objections and Claims

13.1–13.2. Data subjects are Users asserting statutory warranty or guarantee rights. Legal basis: Article 6(1)(c) GDPR.

13.3. Data processed may include the User's name, postal address, details of the claim, resolution and response, supporting documents/evidence, e-mail/telephone contact details, claim identifier and affected order/transaction identifier. Telephone calls are not recorded.

13.4. Data are supplied by the User.

13.5. Purpose: investigation and handling of warranty/guarantee claims and compliance with applicable Hungarian legal obligations.

13.6. Data are generally retained until expiry of the civil-law limitation period, normally 5 years from the relevant due date; claim records required by law are retained for 3 years.

13.7–13.8. Data are stored electronically and, where applicable, on paper. Without the necessary data the claim cannot be investigated or handled.

14. Processing Related to Telephone Contact for Direct Marketing

14.1. Data subjects: Users who voluntarily consent to being contacted by telephone for direct-marketing purposes, online or by paper declaration.

14.2. Legal basis: consent under Article 6(1)(a) GDPR and applicable Hungarian advertising law. Consent may be withdrawn at any time and is not a condition for using other services.

14.3. Data processed: name and telephone number.

14.4. Purpose: recommending products, obtaining experience/opinions and providing information about promotional offers.

14.5. Retention: until withdrawal of consent or deletion at the User's request.

14.6–14.7. Data are stored electronically and, for paper consents, also in filed paper declarations. Without the data, direct-marketing calls cannot be made.

15. Automated Decision-Making and Profiling

15.1. No decisions producing legal or similarly significant effects are made solely by automated means in the processing operations described in this Notice.

15.2. No profiling within the meaning of the GDPR is carried out in the processing operations described in this Notice.

16. Recipients and Data Processors

The Data Controller uses external service providers to support its processing activities. They process personal data only on behalf of and according to the instructions of the Data Controller, subject to applicable data-protection law.

16.1. Hosting provider

Kinsta Ltd.

Company number: 09030972

Address: 142 Cromwell Road, London, SW7 4EF, United Kingdom

E-mail: contact@kinsta.com

Website: <https://kinsta.com>

Purpose: provision of hosting and technical infrastructure necessary for operation of the website.

Processing may concern all data identified in this Notice.

16.2. Website developer

Noll Dániel e.v.

Registration number: 51783497

Tax number: 68463809-1-27

Address: 8086 Felcsút, Fő út 72., Hungary

Telephone: +36 30 835 0297

E-mail: nolldaniel@gmail.com

Purpose: technical operation and development of the website. Processing may concern data technically accessible during performance of these services.

16.3. E-mail hosting

HOSTINGER, UAB

Company number: 302710386

Address: Jonavos str. 60C, LT-44192 Kaunas, Lithuania

Telephone: +370 6450 3378

E-mail: domains@hostinger.com

Website: <https://www.hostinger.hu/>

Purpose: provision and operation of electronic-mail hosting. Data principally include names, e-mail addresses and other personal data contained in e-mail correspondence.

16.4. Processing related to product delivery

For BillionHerbs.eu, the Magyar Posta Zrt./MPL processor and all MPL Parcel Point, PostaPont and MPL parcel-locker references contained in the source Notice have been removed.

Delivery processor/carrier:

GLS General Logistics Systems Hungary Csomag-Logisztikai Korlátolt Felelősségű Társaság

Abbreviated name: GLS General Logistics Systems Hungary Kft.

Company registration number: 13-09-111755

Tax number: 12369410-2-44

Registered office and postal address: 2351 Alsónémedi, GLS Európa u. 2., Hungary

Telephone: +36 29 886 670

E-mail: info@glshungary.com

Website: <https://glshungary.com/HU/hu/home>

Data processed for delivery: surname, first name, telephone number, delivery address and e-mail address.

Purpose: delivery of ordered products and, where necessary, coordination of the place/time of delivery.

Processing is limited to operations necessary for shipment and delivery.

16.5. Newsletter service providers

MailerLite Ltd.

Company number: 689826

Address: 88 Harcourt Street, Dublin 2, D02 DK18, Ireland

Website: <https://www.mailerlite.com/>

UAB Omnisend

Company number: 302530363

Address: Verkių g. 25C-1, LT-08223 Vilnius, Republic of Lithuania

E-mail: info@omnisend.com

Website: <https://www.omnisend.com/>

Purpose: technical operation of newsletter-sending software. Data principally include subscribers' e-mail addresses.

16.6. Invoicing service provider

KBOSS.hu Kereskedelmi és Szolgáltató Kft. (KBOSS.hu Kft.)

Company registration number: 01-09-303201

Tax number: 13421739-2-41

Address: 1031 Budapest, Záhony utca 7., Hungary

Telephone: +36 30 3544 789

E-mail: info@szamlazz.hu

Website: <https://www.szamlazz.hu/>

Purpose: technical provision of invoicing software. Processed records may include customer name/address, ordered goods/services, purchase date, price, delivery charge and other fees.

16.7. Accounting service provider

Turul Könyvelő és Szolgáltató Kft.

Company registration number: 11-09-016603

Tax number: 12450275-2-11

Registered office: 2067 Szárliget, Ady Endre utca 35., Hungary

Branch/postal address: 2800 Tatabánya, Március 15 út 7. fszt. 3., Hungary

Telephone: +36 30 979 2822; +36 70 630 8238

E-mail: konyveloiroda@konyveloirodabt.hu

Website: <https://www.turulkft.hu/>

Purpose: performance of statutory accounting obligations. Processed data are those contained in accounting records relating to orders and payments.

16.8. According to the source Notice, the Data Controller does not use other processors or transfer personal data to further recipients except where disclosure is required in judicial or authority proceedings.

17. Users' Rights Relating to Data Processing

Subject to the conditions of the GDPR, Users may exercise the following rights:

- right to information and transparent communication
- right of access and to receive a copy of personal data
- right to rectification of inaccurate or incomplete data
- right to erasure ('right to be forgotten') where the statutory conditions are met
- right to restriction of processing
- right to notification regarding rectification, erasure or restriction where applicable
- right to data portability for eligible processing based on consent or contract and carried out by automated means
- right to object to processing based on legitimate interests and to direct marketing

The Data Controller will assess each request in accordance with the GDPR. Rights may be subject to statutory exceptions, including where processing is necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

18. Fulfilment of User Requests

18.1. Information and measures concerning data-subject rights are provided free of charge, except where the GDPR permits a reasonable fee or refusal for manifestly unfounded or excessive requests.

18.2. The Data Controller responds without undue delay and in any event within one month of receipt of a request. This period may be extended by two further months where necessary, taking account of the

complexity and number of requests; the User will be informed of the extension and reasons within the first month.

18.3. If the Data Controller does not act on a request, it informs the User without delay, and at the latest within one month, of the reasons and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

18.4. The Data Controller may request additional information necessary to confirm the identity of the person making the request.

18.5. Requests may be sent by post to 2837 Vértesszőlös, Határ út 014/38 hrsz. (B&T Terminál Kft. Office Building), Hungary, or by e-mail to info@billionherb.eu.

19. Data Protection and Data Security

19.1. The Data Controller takes appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, transmission, deletion or destruction, accidental loss or damage, and against becoming inaccessible due to changes in technology.

19.2. Data used for measuring website traffic and usage habits are processed in accordance with the Cookie Notice and applicable consent requirements.

19.3. Personal data are processed only for the lawful purposes and for the periods specified in this Notice, and access is limited to persons and processors who need the data for those purposes.

19.4. The website uses HTTPS encryption to protect data transmitted between the User's device and the website.

20. Enforcement and Remedies

Users may contact the Data Controller at info@billionherb.eu regarding the processing of their personal data and the exercise of their rights.

Users also have the right to lodge a complaint with the Hungarian supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

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

Postal address: 1363 Budapest, Pf. 9., Hungary

Telephone: +36 1 391 1400

E-mail: ugyfelszolgalat@naih.hu

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

The User may also seek a judicial remedy before the competent court in accordance with the GDPR and Hungarian law.

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KONRÁD - Solutions Kft.