

PRIVACY POLICY

The data controller is the operator of the website <https://vitacig.eu.com> (hereinafter: " **Website**"), in terms of data processing, as follows:

Titan Power Ltd.

registered office: Királyok útja 291. D. ép. fszt. 2. , 1039 Budapest Hungary

tax number: HU25383003

company registration number: 01-09-271967

registration organization: Registry Court at Metropolitan Court (Budapest)

hereinafter referred to as "**Titan Power**" or "**we**" or "**us**".

This policy contains information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

The policy is applicable for visiting the Website and shopping online on the Website as well.

Maintaining the security of your data is a priority at Titan Power and we are committed to respect your rights to privacy. We pledge to handle your data fairly and legally at all times. Titan Power is also dedicated to be transparent about the type of data collected and on the use of said data.

SECTION 1 - THE PURPOSE, SCOPE AND DURATION OF DATA PROCESSING

The Website's visitors and customers are considered as data subjects. Titan Power collects the personal data of the Website's data subjects, necessary for contacting and communicating with the Website, providing information about the Website's offers and promotions, fulfilling sales and purchase contracts concluded through the Website and exercising other rights related to the contracts or fulfilment of obligations (e.g. right of withdrawal or warranty claims).

You have the opportunity to register by providing certain additional personal data (creating an account) but it is also possible to make purchases through the Website without registration.

Personal data is collected by us or by persons/organizations providing data processing for the purpose and content specified by Titan Power. The data collection lasts as long as the fulfilment of contractual or legal obligations, the enforcement of claims arising from the contract or other data management purposes require it. Personal data will be deleted from our records or properly anonymised if they are no longer needed.

The data controller has the right to forthwith delete the personal data provided to us in case of unlawful, deceptive use of personal data and/or in the case of a criminal offence carried out by the person concerned, moreover in case of an attack on the data controller's IT system. However, in case of an ongoing authority or court procedure concerning the above-mentioned the personal data may be saved for the duration of the procedure of the proceedings or for the time the court indicates. Insofar as the court or authority legally mandates the data controller must carry out the erasure of the personal data in accordance with the mandate.

SECTION 2 - DATA WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Information that you provide by filling in forms on our Website. Such information may include, for example, your name, home and/or business address, email address, telephone number. We may also ask you for information when you sign-up for email newsletters, and when you report a problem with our Website.

If you contact us, we may keep a record of that correspondence.

On the basis of your expressed marketing preferences, we may send you marketing information about goods that may be of interest to you by email or other means. You have the right to “opt in” and “opt out” of certain uses of your personal information for these purposes.

Details of your visits to our Website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise.

Information regarding the interactions via emails we send you, irrespective whether or not you open the email.

At the time of accessing our Website you have to confirm that you are at least the age of majority in your state of residence. By using the Website, you represent that you are at least the age of majority in your state of residence too. If you are below the age of majority, you cannot access nor use the Website. You are responsible for bringing these terms to the attention of anyone who may read material on this Website as a result of your access to it.

SECTION 3 - IP ADDRESSES AND COOKIES

We may collect information about your computer, mobile phone, personal electronic device, and all other similar electronic or mobile devices, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not show personal details that may identify you.

For the same purpose, we may obtain information about your general internet usage by using a cookie file that is stored on the hard drive of your computer. Cookies are small pieces of information (e.g., cookies, web beacons, pixels, gifs tags or other similar technologies) sent by a web server to a web browser that allow the web server to recognize the web browser. This operates as a piece of data stored on your browser or device, or may identify, compile, aggregate and/or collect information through other means. They help us to improve our Website and to deliver a better and more personalized service.

You can control how your browser handles cookies received from our Website. You can choose to refuse all cookies, or to be prompted before a cookie is saved to your hard drive, or to only accept cookies from certain selected websites designated by you. Information on deleting or controlling cookies is available at www.AboutCookies.org. By refusing to accept cookies from us, you may not be able to use some of the features and functionality available on our Website.

SECTION 4 - LEGAL GROUNDS FOR PROCESSING DATA

Contract: the processing of personal data is necessary for fulfilment of the contract in which you are a party or the data processing is necessary to take steps at your request before entering into the contract (Art. 6 (1) (b) GDPR)

Fulfilment of legal obligation: the processing of certain personal data (mainly from tax, accounting purposes) is obligatory due to legal obligations, and authority or court request may also make data processing obligatory for us (Art. 6 (1) (c) GDPR).

Consent: in all cases we request explicit consent to processing of personal data (eg name, e-mail address) which are only necessary for the communication of information for marketing purposes (eg newsletters, advertisements, promotions) (Art. 6 (1) (a) GDPR).

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at info@vitacig.eu.com or mailing us at:

Titan Power Ltd.
Királyok útja 291. D. ép. fszt. 2.
1039 Budapest Hungary

Legitimate interest: sometimes we need to process personal data in order to carry out tasks related to our business activities. Before doing so we will also carefully consider and balance any potential impact on you and your rights. Typically personal data is processed for direct marketing purposes, to prevent fraud or to ensure the network and information security of our IT systems. (Art.6 (1) (f) GDPR).

SECTION 5 - PRINCIPLES OF THE DATA PROCESSING

We perform the data processing lawfully, fairly and in a transparent manner, in accordance with the principles of purposefulness, data saving, accuracy, limited storage, integrity, confidentiality, and accountability.

We draw your attention to the fact that you provide your personal data to us on a voluntary basis, but in the absence of specific data or in case of inaccurate data, we may not be able to communicate properly, enter into and/or fulfilment of the contract. We also explicitly indicate on the Website which data is essential for contacting, or entering into and fulfilling the contract.

We do not verify the personal data provided by you. You are solely responsible for the adequacy of the personal data, however, we shall take all reasonable measures to immediately delete or correct personal data that is not necessary for the purposes of data processing or that is incorrect or inaccurate.

Once you leave our Website or are redirected to a third-party website or application, you are no longer governed by either this Privacy Policy or our Website's Terms and Conditions.

SECTION 6 - THIRD-PARTY SERVICES

We use accounting, IT, banking and delivery services for our economic activities provided by third parties. Based on the contracts concluded by us with the service providers, a certain range of personal data may be transferred to these service providers for the purpose of data processing due to the nature of the service.

Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information which are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

SECTION 7 - SECURITY

The personal data that we collect from you is stored in a country of the European Union. To protect your personal information, we take reasonable precautions and follow the best practices in the industry. We protect your data against all potential risks, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage or inaccessibility due to changes in the technology used. We ensure the protection of the security of data processing by all appropriate means especially, with technical and organizational measures that provides a level of protection appropriate to the risks related to data processing.

SECTION 8 - YOUR RIGHTS CONCERNING THE DATA PROCESSING

As a natural person whose personal data is processed by the data controller, we would like to inform you of the following rights you have:

Right to information: The data subject has the right to receive information on the course of data collection prior to the start of the obtaining of personal data. (Art. 13 GDPR)

Right of access: The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data (copy of the personal data which are the subject of the processing). (Art. 15 GDPR)

Right to Rectification: The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. (Art. 16 GDPR)

Right to Erasure: The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay, if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed and if any of the grounds for erasure under (b)-(f) of Art. 17 (1) GDPR apply. (Art. 17 GDPR)

Right to Restriction of Processing: The data subject has the right to obtain from the controller restriction of processing especially, if the controller no longer needs the personal data for the purposes of the processing or in case the processing is unlawful or in case any other grounds stipulated under (a)-(d) of Art. 18(1) GDPR are applicable. (Art. 18 GDPR)

Notification obligation regarding rectification or erasure of personal data or restriction of processing: The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it. (Art. 19 GDPR)

Right to Data Portability: In accordance with the conditions stipulated under Article 20 GDPR the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. (Art. 20 GDPR)

Right to Object: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on (f) of Art. 6. (1) GDPR. (Art. 21 GDPR)

Right to automated individual decision-making, including profiling: The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effect concerning him or her or similarly significantly affects him or her. (Art. 22 GDPR)

Right to communication of a personal data breach to the data subject: When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. (Art. 34 GDPR)

Right to File a Complaint with a Supervisory Authority: Every data subject has the right to file a complaint with a supervisory authority without prejudice to other administrative or judicial legal remedies, in particular in the member state of their residence, their workplace or the place the alleged offense occurred, if the data subject is of the view that the processing of personal data concerning him or her breaches these legal provisions. (Art. 77 GDPR)

Right to an effective judicial remedy against a supervisory authority: Each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them or if the competent supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress of the outcome of the complaint lodged. (Art. 78 GDPR)

Right to an effective judicial remedy against a controller or processor: Each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data. (Art. 79 GDPR)

SECTION 9 - GDPR

We refer in this Privacy Policy to the General Data Protection Regulation of the European Union - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (General Data Protection Regulation), by its abbreviated name (GDPR).

SECTION 10 - DATA PROTECTION AUTHORITY

You may have the right to make a complaint to a data protection authority if you think your personal data were processed in an unlawful manner or in breach of your rights.

Data Protection Authority in Hungary:

Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)

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

phone: +36 (1) 391-1400

fax: +36 (1) 391-1410

e-mail: ugyfelszolgalat@naih.hu

Detailed information on the complaint procedure can be found on the website: <https://naih.hu>.

SECTION 11 - QUESTIONS, REMARKS AND REQUESTS RELATED TO THE DATA PROCESSING

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint. If you simply want more information contact us at info@vitacig.eu.com or by mail at:

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SECTION 12 - LINKS

When you click on links on our Website, they may direct you away from our Website. We are not responsible for the privacy practices of other websites and encourage you to read their privacy statements.

SECTION 13 - CHANGES TO THIS PRIVACY POLICY

This Privacy Notice was closed on 20/01/2021.

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

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Budapest, 20/01/2021.

Titan Power Ltd.