

Privacy Policy

Energofish Kft. is committed to protecting the personal data of its customers and partners, and considers its customers to be of utmost importance respecting the right to self-determination of information. Energofish Kft. treats personal data confidentially and takes all security, technical and organizational measures that guarantee data security.

Energofish Kft. describes its data management practices and related information below:

1. Information and contact details of the data controller

Data controller: Energofish Kft.

Data controller representative: István Pál, managing director

Headquarters: 1201 Budapest, Helsinki út 74.

Phone: +36-1-283-2285

E-mail: info@energofish.hu

Website: www.energofish.hu

The basic data management principles of Energofish Kft. are in accordance with the applicable legislation related to data protection, thus especially with the following:

Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) - the personal data of natural persons on the protection of data in terms of processing and the free flow of such data, as well as Regulation 95/46/EC repealing (General Data Protection Regulation, GDPR)

- CXII of 2011 Act - on the right to information self-determination and freedom of information (Infotv.)
- Act V of 2013 - on the Civil Code (Ptk.)
- CLV of 1997. law - on consumer protection (Fgytv.)
- XIX of 1998 law - on criminal procedure (Be.)
- Act C of 2000 - on accounting (Accounting Act)
- CVIII of 2001 law - with electronic commercial services and the information society on some issues of related services (Eker. tv.)
- Act C of 2003 - on electronic communications (Eht.)
- CXXXIII of 2005 Act - on the rules of personal and property protection, as well as private investigative activities (SzVMt.)
- XLVIII of 2008 Act - on certain limitations of economic advertising activity (Gr.)
- XXV of 2023 Act - on complaints, reports of public interest, and rules related to the reporting of abuses (Panasztv.)

The data processing of Energofish Kft.'s activities is mostly based on voluntary consent. In certain cases however, the management, storage, and transmission of a range of the given data is made mandatory by the legislation, which it is about in the description of some data management, we inform the data subjects.

Websites involved in the data management of Energofish Kft.:

www.energofish.hu | www.energofish.ro | www.energofish.com | www.energofish.sk | www.energofish.cz |
www.energofish.rs | www.energofish.es | www.energofish.at | www.energo.fish | www.baleno.hu |
www.carpexpert.hu | www.halasfoto.hu | www.halasparna.hu | www.sonik.hu | www.outdoorteleshop.com |
www.horgaszajandek.hu | www.tomonitoring.hu | www.lbfishing.hu | www.benzarmix.com

Energofish Kft.'s locations involved in data management:

- **Headquarters:** 1201 Budapest, Helsinki út 74.
- **Marcali production plant:** 8700 Budapest, Honvéd u. 1.
- **Dömsöd production plant:** 2344 Dömsöd, Dunavecsei út 24/A.
- **Retail sample store:** Peca Pláza Market Central, 2220 Vecsés, Fő út 246.

In the following, we list personal data processing carried out by Energofish Kft., its purpose, data processing its legal basis, the scope of personal data processed, the duration of data management, any data transfer and its purpose, the name of data processors.

Name and address of data processors (summary table):

Name	Headquarters
3 in 1 Hosting Bt.	2310 Szigetszentmiklós, Szivárvány u. 1.
Barion Payment Zrt.	1117 Budapest, Irinyi József u. 4-20. 2. emelet
Comnica Kft.	1119 Budapest, Mohai út 38.
CREON HEROES Zrt. (Webgalamb™)	5561 Békésszentandrás, Dr. Dunay Alajos u. 1.
Dancs Zoltán Árpád	1239 Budapest, Szent István u. 31. 1/A.
DEACON COLEMAN Kft. (Speedbird)	1222 Budapest, Bérkocsi u. 45.
DEKOR STUDIO SK, spol. s r.o.	Kostolné Kračany 26, 930 03 Kostolné Kračany (Szlovákia)
Dyntell Magyarország Kft.	1117 Budapest, Gábor Dénes u. 2. D/1. INFOPARK
Economic Mentor Kft.	1095 Budapest, Boráros tér 7., 2-es lh. 7/11.
Energofish Impex SRL	40064 Cluj-Napoca, Bulevardul Muncii 16. (Románia)
ENERGOTEAM D.O.O.	Ul.Majakovskog 38, Nis, 18000 (Szerbia)
Fáma First Kft.	2220 Vecsés, Tengely u. 3.
FEDEX Express Hungary Transportation Kft.	1185 Budapest, BUD Nemzetközi Repülőtér II Logisztikai központ – Irodaépület, 283.
Fülöp Rita	1012 Budapest, Pálya u. 7. 2/5.
GLOBUS SOFTWARE DEVELOPEMENT COMPANY SRL	540203 TARGU MURES, Str. ROMULUS GUGA 1. (Románia)
GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.	2351 Alsónémedi, GLS Európa u. 2.
Hetzner Online GmbH	Industriestr. 25 91710 Gunzenhausen (Németország)
Hive Creative Kft.	1041 Budapest, István út 16., 1 em. 6.
Hírös Európa Trans Kft.	6000 Kecskemét, Muskotály u. 12.
Kocsis József e.v.	1203 Budapest, Helsinki út 2. 4/74.
Magyar Posta Zrt.	1138 Budapest, Dunavirág u. 2-6.
Master-Hardware Kft.	1213 Budapest, Horgász u. 6.
Matviychuk Volodymyr	Zanykoveckoji 77/23, Uzhgorod, 88000 (Ukrajna)
Ovenfor Kft.	1039 Budapest Királyok útja 247.
p2m Consulting Kft.	1062 Budapest, Andrásy út 107. 2/9.
Raben Trans European Hungary Kft.	2330 Dunaharaszti, Jedlik Ányos u. 31.
S.C. NetSoft S.R.L.	540014 Tg.Mures, str. Tudor Vladimirescu nr. 63 ap. 1. (Románia)
SPRINTER Futárszolgálat Kft.	1097 Budapest, Táblás u. 39.
Szuper Péter	Europa Strasse 50/1, Judenburg (Ausztria)
TÁLENT Védelem Kft.	1203 Budapest, Téglagyártó út 9., fsz. 128A.
Tárhely.eu Szolgáltató Kft.	1144 Budapest, Ormánság u. 4. X. em. 241.
Tele-Mon Kom Kft.	1098 Budapest, Napfény u. 14. 2/10.
Tematik Kábel Kft.	1012 Budapest, Márvány u. 17.
TTC-Soft Kft.	1121 Budapest, Kakukk u. 7.
Verbényi Gergő Mátyás	Urb Geranios Barrio Cotera 239-E, chalet 4, Villanueva de la Peña 39509 (Spanyolország)

2. Management of personal data of residential customers, including online use

The purpose of data management:

Purchases and invoices at the Peca Pláza store or on the websites www.pecaplaza.hu and www.lbfishing.hu issuing, registering and distinguishing registered customers, documenting purchases and payments, fulfillment of accounting obligations, delivery of ordered products, customer relations.

Legal basis for data management:

Data management is necessary for the performance of the contract [GDPR Article 6 (1) para. point b)], Account no. tv. 169. Section (2), a voluntary consent of the buyer.

Scope of processed data:

Name, telephone number, address, e-mail address, data required for invoicing, date, name of purchased products, quantity, purchase price, payment method, customer's comments on the order.

Duration of data management:

The Account TV. In accordance with Section 169 (2), eight years, or until the withdrawal of voluntary consent, contract until termination.

Data transmission:

The customer's orders, personal data, loyalty card number, loyalty point and coupon balance you can view it in the Pecapláza Application.

The transmission of the customer's e-mail address and order number specified at the time of ordering to the system of the service provider that handles online bank card payments. This service provider notifies the customer about the status of the bank card transaction via the provided e-mail address, which is a communication independent of our company. Furthermore, these data help to identify the transaction related to the purchase in the service provider's system. You can read the service [provider's own Privacy Policy here](#).

Data processors:

- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- Barion Payment Zrt. **Data processing task:** storing datas of orders, handle online bank card transmissions
- Creon Heroes Zrt. **Data processing task:** management of newsletter databases, operation of newsletter sending software.
- Comnica Kft. **Data processing task:** provision of a cloud-based telephone register service.
- Zoltán Árpád Dancs **Data processing task:** analysis of data related to purchases and customers.
- DEACON COLEMAN Kft. (Speedbird) **Data processing task:** application development, data transfer to application.
- DEKOR STUDIO SK, spol. s.r.o. **Data processing task:** handling data related to customer orders
- Dyntell Magyarország Kft. **Data processing task:** operation of business intelligence (BI) data analysis software.
- Economic Mentor Kft. **Data processing task:** management of financial and accounting data.
- Fáma First Kft.: **Data processing task:** processing data required for shipping.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- GLS General Logistics Systems Hungary Csomag-Logisztikai Kft. **Data processing task:** for shipping necessary data processing.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and management, cloud-based hosting service.
- Hive Creative Kft. **Data processing task:** analysis of customer habits, preparation of statistics and reports, providing more targeted customer service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Magyar Posta Zrt. **Data processing task:** processing of data required for shipping.
- p2m Consulting Kft. **Data processing tasks:** IT consulting, information security support, process control.

- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- SPINTER Futárszolgáltató Kft. **Data processing task:** processing of data required for shipping.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.
- Tematik Kábel Kft. **Data processing task:** customer communication.
- TTC-Soft Kft. **Data processing task:** development of company management and customer registration system, server services, related infrastructure developments.

3. Management of personal data related to wholesale partners, including online use

The purpose of data management:

Purchases and invoices issued on Energofish Kft.'s websites and at the Budapest location, the registered registration of customers, distinguishing them from each other, documentation of purchases and payments, accounting, fulfillment of obligations, delivery of ordered products, customer relations, the wholesaler partner displaying your contact details on Energofish Kft.'s websites.

Legal basis for data management:

Data management is necessary for the performance of the contract [GDPR Article 6 (1) para. point b)], Account no. tv. 169. § (2), voluntary contribution of the wholesale partner.

Scope of processed data:

Name, telephone number, address, e-mail address, data required for invoicing, date, name of purchased products, quantity, purchase price, payment method, contact details of wholesalers (name, e-mail address, address, phone number).

Duration of data management:

The Account TV. In accordance with Section 169 (2), eight years, or until the withdrawal of voluntary consent, contract until termination.

Data processors:

- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- Creon Heroes Zrt. **Data processing task:** management of newsletter databases, operation of newsletter sending software.
- Comnica Kft. **Data processing task:** provision of a cloud-based telephone register service.
- Zoltán Árpád Dancs **Data processing task:** analysis of data related to purchases and customers.
- DEACON COLEMAN Kft. (Speedbird) **Data processing task:** application development, data transfer to application.
- DEKOR STUDIO SK, spol. s.r.o. **Data processing task:** handling data related to customer orders.
- Dyntell Magyarország Kft. **Data processing task:** operation of business intelligence (BI) data analysis software.
- Economic Mentor Kft. **Data processing task:** management of financial and accounting data.
- ENERGOTEAM D.O.O. **Data processing task:** serving customer orders, managing customer records.
- Energofish Impex SRL **Data processing task:** serving customer orders, managing customer records.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- GLS General Logistics Systems Hungary Csomag-Logisztikai Kft. **Data processing task:** for shipping necessary data processing.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and management, cloud-based hosting service.
- Hive Creative Kft. **Data processing task:** analysis of customer habits, preparation of statistics and reports, providing more targeted customer service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Magyar Posta Zrt. **Data processing task:** processing of data required for shipping.

- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Matviychuk Volodymyr **Data processing task:** servicing customer orders, managing customer records.
- p2m Consulting Kft. **Data processing tasks:** IT consulting, information security support, process control.
- Raben Trans European Hungary Kft. **Data processing task:** processing data required for shipping.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- SPINTER Futárszolgált Kft. **Data processing task:** processing of data required for shipping.
- Péter Szuper **Data processing task:** servicing customer orders, managing customer records.
- TTC-Soft Kft. **Data processing task:** development of company management and customer registration system, server services, related infrastructure developments.
- Mátyás Verbényi Gergő **Data processing task:** serving customer orders, managing customer records.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.

4. Special wholesale offers through websites.

The purpose of data management:

We provide the opportunity to receive a unique product offer via URL (product link) on the websites of Energofish Kft to establish a future wholesale partner relationship. It is the user who came to the website via the offer link after placing the product(s) on offer at the suggested price in the cart, or by clicking on any other link on the site, you will come to a registration form, where you enter your personal data and register as a wholesale partner is created. The registration is activated immediately and provides the user with the opportunity to make a purchase. The offer voluntary, it ends with registration, closing the browser or pressing the "exit" button. Details a in help on the website.

Legal basis for data management:

Data management is necessary for the performance of the contract [GDPR Article 6 (1) para. point b)], Account no. tv. 169. § (2), voluntary consent of the registrant.

Scope of processed data:

Required for partner registration: name (company name), tax number, e-mail address, county (on some pages: country), password entering.

Necessary for partner purchases (can be entered regardless of registration): billing address data

(postcode, settlement, name of public area, telephone number), address data required for delivery (name (company name), postal code, county (on some pages: country), settlement, name of public area).

In order to process the order and wait, it is necessary: name of the purchased products, quantity, purchase price, payment mode.

After registering as a partner, our staff will contact the client with whom you enter into a partnership agreement.

Duration of data management:

The Account TV. In accordance with Section 169 (2), eight years, or until the withdrawal of voluntary consent, contract until termination.

Data processors:

- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- Creon Heroes Zrt. **Data processing task:** management of newsletter databases, operation of newsletter sending software.
- Comnica Kft. **Data processing task:** provision of a cloud-based telephone register service.
- Zoltán Árpád Dancs **Data processing task:** analysis of data related to purchases and customers.

- DEACON COLEMAN Kft. (Speedbird) **Data processing task:** application development, data transfer to application.
- DEKOR STUDIO SK, spol. s.r.o. **Data processing task:** handling data related to customer orders.
- Dyntell Magyarország Kft. **Data processing task:** operation of business intelligence (BI) data analysis software.
- Economic Mentor Kft. **Data processing task:** management of financial and accounting data.
- ENERGOTEAM D.O.O. **Data processing task:** serving customer orders, managing customer records.
- Energofish Impex SRL **Data processing task:** serving customer orders, managing customer records.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- GLS General Logistics Systems Hungary Csomag-Logisztikai Kft. **Data processing task:** for shipping necessary data processing.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and management, cloud-based hosting service.
- Hive Creative Kft. **Data processing task:** analysis of customer habits, preparation of statistics and reports, providing more targeted customer service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Magyar Posta Zrt. **Data processing task:** processing of data required for shipping.
- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Matviychuk Volodymyr **Data processing task:** servicing customer orders, managing customer records.
- p2m Consulting Kft. **Data processing tasks:** IT consulting, information security support, process control.
- Raben Trans European Hungary Kft. **Data processing task:** processing data required for shipping.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- SPINTER Futárszolgált Kft. **Data processing task:** processing of data required for shipping.
- Péter Szuper **Data processing task:** servicing customer orders, managing customer records.
- TTC-Soft Kft. **Data processing task:** development of company management and customer registration system, server services, related infrastructure developments.
- Mátyás Verbényi Gergő **Data processing task:** serving customer orders, managing customer records.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.

5. Processing of consumer requests, including online use.

The purpose of data management:

On the websites of Energofish Kft., we forward the purchase requests of consumers (visitors) to contracted partner stores for our wholesale customers, no sales are made at this point. The consumer's personal data and by him products placed in the basket (basket as a digital request form) are forwarded to the retailer indicated by the consumer to our partner. The process is not considered an order, the consumer is not obliged to purchase. The further our partners make contact with the consumer. Detailed information, rules of participation and also in the function.

Participating data processing partner stores can be reached at the following link:

<https://energofish.hu/retailform.php> (use the domain suffix of this site e.g. „.com”, this feature may be limited to certain websites)

Legal basis for data management:

Voluntary consent of the person concerned.

Scope of processed personal data:

Name, telephone number, e-mail address, chosen partner store, name of requested products, quantity, recommended customers gross price.

Duration of data management:

Until the consent statement of the person concerned is withdrawn.

Data transmission:

The name, e-mail address, phone number, and details of the requested products for wholesale partners for customer communication purposes.

Legal basis for data transfer:

Voluntary consent of the person concerned.

Data processors:

- The partner stores indicated on the website (<https://energofish.hu/retailpartners.php>). **Data processing task:** processing requests. If the requirements are met, the selected partner is independent becomes a data controller with regard to the transferred personal data.
- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- Zoltán Árpád Dancs **Data processing task:** analysis of data related to purchases and customers.
- DEKOR STUDIO SK, spol. s.r.o. **Data processing task:** handling data related to customer orders.
- Dyntell Magyarország Kft. **Data processing task:** operation of business intelligence (BI) data analysis software.
- Economic Mentor Kft. **Data processing task:** management of financial and accounting data.
- Energofish Impex SRL **Data processing task:** serving consumer needs, managing customer records.
- ENERGOTEAM D.O.O. **Data processing task:** serving consumer needs, managing customer records.
- Fáma First Kft.: **Data processing task:** processing data required for shipping.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- GLS General Logistics Systems Hungary Csomag-Logisztikai Kft. **Data processing task:** for shipping necessary data processing.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and operation, cloud-based hosting service.
- Hive Creative Kft. **Data processing task:** analysis of customer habits, preparation of statistics and reports, providing more targeted customer service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Magyar Posta Zrt. **Data processing task:** processing of data required for shipping.
- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Matviychuk Volodymyr **Data processing task:** serving consumer needs, managing customer records.
- p2m Consulting Kft. **Data processing tasks:** IT consulting, information security support, process control.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- SPINTER Futárszolgált Kft. **Data processing task:** processing of data required for shipping.
- Péter Szuper **Data processing task:** serving consumer needs, managing customer records.
- TTC-Soft Kft. **Data processing task:** development of company management and customer registration system, server services, related infrastructure developments.
- Mátyás Verbényi Gergő **Data processing task:** serving customer orders, managing customer records.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.

6. Apply for a job advertisement

Energofish Kft. offers job opportunities to fill labor shortages arising in its operations.

By sending his CV, the User accepts the data management information of Energofish Kft., declares that it is has understood and acknowledged the information contained herein, and declares that he is providing his data voluntarily, and the present expressly consents to the data management as stated in the information sheet. Under

CV, the User's CV and motivation letter, attached, uploaded reference and other documents together with their full content.

The data controller is not responsible for any personal information that is brought to its attention without your express request (e.g. included in a CV) for special data, so please do not provide such data unless expressly requested. Have the opportunity to provide a reference (e.g. your former employer). In this case, it is the User's duty and responsibility to obtain the reference person's consent to be contacted.

By applying, the User consents to being contacted by one of the contact details provided by the User.

The purpose of data management:

For the purpose of contacting the applicant for a job offer and getting to know the applicant in advance. Furthermore, for the purpose of later visiting the applicant who is selected but does not hold a position.

Duration of data management:

Until the position is filled, or

- In case of rejection of the application, or despite the positive evaluation of the application, if the job title is not the same it is filled in by an applicant selected by the data controller, for another 3 months for the purpose of repeated contact; obsession
- In case of sending the Data Subject's CV to the data controller in the absence of an advertised job offer in order to eliminate the labor shortage, for the purpose of repeated contact for 1 year.

The candidate is solely responsible for the veracity and accuracy of personal data.

Legal basis for data management:

The Data Subject's personal data is processed on the basis of voluntary consent, consent can be given at any time revocable.

Scope of processed personal data:

Curriculum vitae, their details in general: name, portrait, date of birth, phone number, e-mail address, previous jobs, academic data, skills, qualifications, hobbies, personal evaluation.

Possible consequences of failure to provide data:

Entering the data ensures participation in the recruitment processes of Energofish Kft. for the candidates.

If you do not enter the data, this is not possible.

Data transmission:

We cannot forward the resumes of our candidates.

Automated decision making:

We would like to inform you that there is no profiling or automatic decision-making by the Data Controller.

Data processors:

- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- Rita Fülöp **Data processing task:** recruitment of human resources, organization of job advertisements.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and operation, cloud-based hosting service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.

- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Ovenfor Kft **Data processing task:** human resource support and organization of job advertisements.
- p2m Consulting Kft. **Data processing task:** IT consulting, information security support, process control.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.

7. Application of an electronic monitoring system within the premises of Energofish Kft

The purpose of data management:

The data controller is the employees of Energofish Kft., as well as the business partners who come to Energofish Kft. processing the data of subcontractors and guests, protection of properties used by the data controller, asset protection, in order to prevent crimes. Information on the use of the surveillance system at the entry points is located.

Legal basis for data management:

- On the protection of natural persons regarding the management of personal data and such data Article 6 (1) of Regulation 2016/679 on the free movement of goods and repealing Regulation 95/46/EC point f) of paragraph According to this, the processing of personal data is only legal if and to the extent that "it data management is necessary to enforce the legitimate interests of the data controller or a third party, unless on this over interests, the interests or fundamental rights and freedoms of the data subject take precedence they require the protection of personal data".
- The recommendation of the National Data Protection and Freedom of Information Authority is electronic use in the workplace about the basic requirements of a monitoring system.
- Section 9 (2) and Section 11 (2) of Act I of 2012 on the Labor Code, hereinafter: Mt.), CXII of 2011 on freedom of information. Act (hereinafter: Infotv.)
- CXXXIII of 2005 on the rules for the protection of persons and property, as well as private investigative activities.

The interest assessment test can be viewed on site upon request.

Scope of processed personal data:

The personal data to be processed is a copy of the image taken on the basis of the camera recording.

Duration of data management:

The data manager deletes the recordings three working days after they were recorded, unless they are for use they cost. Use is considered if the recorded image, sound, or image and sound recording, as well as other personal data is used by the data controller as evidence in court or other official proceedings.

Data processors:

- Energofish Impex SRL **Data processing task:** serving consumer needs, managing customer records.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Ovenfor Kft **Data processing task:** human resource support and organization of job advertisements.
- TÁLENT Védelem Kft. **Data processing task:** operation of site security equipment and managing live and recorded images of cameras for the purpose of personal and property protection.
- Tele-Mon Kom Kft. **Data processing task:** Operation of camera systems and recording equipment, operation of alarms and telephone service.

8. Creation of a marketing database with data provided through the website

The purpose of data management:

Construction of a database for business purposes, sending e-mail newsletters containing economic advertising to those concerned, online making personalized offers using analytical data, and the data controller's own offers and those of its partners forwarding.

Only persons over the age of 16 may contribute to inquiries for direct marketing purposes.

In order to provide customers with a more targeted and personalized service, as well as the most useful content for them profiling is done in order to provide. In the course of this, we mark the individual visitor and customer groups as such their shopping habits, fishing-related habits, territorial data, their activity in the communication channel based on.

Legal basis for data management:

The consent of the concerned volunteer, Grt. Paragraph (5) of § 6

Scope of processed personal data:

Identification number, name, address, e-mail address, telephone number, consent given for inquiries for direct marketing purposes, as well as the stored by the system when signing up and unsubscribing, sending, delivering and opening messages, as well as those concerned analytical data related to your online activity (e.g. date and time of events, content viewed, computer IP address, reason for non-delivery, shopping habits, demographic data, transaction data).

Duration of data management:

Until the consent statement of the person concerned is withdrawn.

Possible consequences of failure to provide data:

The data subject is not informed about the offers of the data controllers and their partners.

Revocation of consent to the transmission of direct marketing messages and related personal data can be deleted or modified via the link communicated in the sent message or in the letter sent to the data controller to ask.

Data processors:

- Creon Heroes Zrt. **Data processing task:** management of newsletter databases, operation of newsletter sending software.
- Zoltán Árpád Dancs **Data processing task:** analysis of data related to purchases and customers.
- DEKOR STUDIO SK, spol. s.r.o. **Data processing task:** managing customer records.
- Dyntell Magyarország Kft. **Data processing task:** operation of business intelligence (BI) data analysis software.
- ENERGOTEAM D.O.O. **Data processing task:** managing customer records.
- Energofish Impex SRL **Data processing task:** managing customer records.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and operation, cloud-based hosting service.
- Hive Creative Kft. **Data processing task:** analysis of customer habits, preparation of statistics and reports, providing more targeted customer service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Matviychuk Volodymyr **Data processing task:** managing customer records.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- Péter Szuper **Data processing task:** managing customer records.
- Mátyás Verbényi Gergő **Data processing task:** managing customer records.

9. Contacting, customer correspondence

The purpose of data management:

Answering the questions of interested parties, distinguishing them from each other, and ensuring retrievability.

Legal basis for data management:

The voluntary consent of the interested party is realized, and the data manager has a legitimate interest in the interested parties to answer your questions, to distinguish them from each other, to be retrievable [GDPR Article 6 (1)]

Scope of processed personal data:

The name, e-mail address and personal data provided in the message provided on the contact form used on the website.

Duration of data management:

Until voluntary consent is withdrawn.

Data processors:

- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- Comnica Kft. **Data processing task:** provision of a cloud-based telephone register service.
- DEKOR STUDIO SK, spol. s.r.o. **Data processing task:** management of customer records, customer communication
- ENERGOTEAM D.O.O. **Data processing task:** management of customer records, customer communication.
- Energofish Impex SRL **Data processing task:** management of customer records, customer communication.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL **Data processing task:** operation of websites, development, maintenance and development of databases.
- Hetzner Online GmbH **Data processing task:** provision of web server services and infrastructure and operation, cloud-based hosting service.
- Hive Creative Kft. **Data processing task:** analysis of customer habits, preparation of statistics and reports, providing more targeted customer service.
- József Kocsis **Data processing task:** performance of system administrator tasks, system administration.
- Master-Hardware Kft. **Data processing task:** server operation, making backups.
- Matviychuk Volodymyr **Data processing task:** management of customer records, customer communication.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- Péter Szuper **Data processing task:** management of customer records, customer communication.
- Mátyás Verbényi Gergő **Data processing task:** management of customer records, customer communication.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.

10. Abuse reporting system (Complaints management)

The purpose of data management:

Ebergofish Kft. operates an abuse reporting system according to the Act XXV of 2023 on complaints, reports in the public interest, and rules related to the reporting of abuse.

Legal basis of data management:

If the person submitting the complaint wants to make a report by name, their data is necessary for handling the complaint and possible legal proceedings, as well as for customer communication purposes.

Scope of processed personal data:

The sender's name, e-mail address, phone number, category of complaint chosen, and description of the complaint.

Duration of data management:

If, based on the investigation, the report is unfounded or no further action is necessary, the personal data relating to the report will be deleted by the Data Controller within 60 days after the end of the investigation.

If action is taken based on the investigation - including action due to legal proceedings or disciplinary action against the reporting person - the Data Controller will process the data related to the report until the legal proceedings initiated based on the report are concluded.

Until the consent of the person submitting the complaint is withdrawn (he/she requests the deletion of his/her data), or if he/she proposes the closure of the complaint case (except during legal action or disciplinary proceedings).

Data processors:

- 3 in 1 Hosting Bt. **Data processing task:** provision of e-mail based communications.
- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL Data processing task: operation of websites, development, maintenance and development of databases.
- Hetzner Online GmbH Data processing task: provision of web server services and infrastructure and operation, cloud-based hosting service.
- Ovenfor Kft **Data processing task:** human resource support and organization of job advertisements.
- S.C. NetSoft S.R.L. **Data processing task:** web server logging, operation, technical support, making backups.
- Tárhely.eu Szolgáltató Kft. **Data processing task:** provision of e-mail based communications.

11. Website web server logging**The purpose of data management:**

The safe provision of the contents of the Energofish Kft. website to the user.

Legal basis for data management:

It is the legitimate interest of the data controller that websites can operate and serve the website safely visiting interested parties and customers.

Scope of processed personal data:

IP address of the visitor's web client machine, browser type.

Duration of data management:

1 year.

Data processors:

- Hetzner Online GmbH Data processing task: provision of web server services and infrastructure and operation, cloud-based hosting service.
- p2m Consulting Kft. Data processing tasks: IT consulting, information security support, process control.
- S.C. NetSoft S.R.L. Data processing task: web server logging, operation, technical support, making backups.

12. Cookies - online interfaces

In order to provide customized service, the data controller stores a small data package on the user's computer, the so-called cookies places it and reads it back during the next visit. If the browser returns a previously saved cookie, the cookie manager service provider has the option to connect the user's current visit with previous ones, but only its own in terms of content.

(Permanent) cookies with an exact validity period until they are deleted, but at the latest until their validity period expires are stored on the computer.

The user can delete cookies from his computer or disable the use of cookies in his browser. The cookies usually in the Tools/Settings menu of the browsers, Data protection/History/Personal settings

under the menu, with the names cookie, cookie or tracking.

A cookie is an alphanumeric information package with variable content sent by a web server and stored on the user's computer is recorded and stored for a predetermined validity period. The use of cookies enables the visitor to query some of your data and to track your internet usage. So with the help of cookies the interests, internet usage habits and website visits of the affected user can be precisely determined history. Since cookies act as a kind of tag, with which the website can recognize the visitor who returns to the page, with their application, a valid username and password can also be stored on the given page. If during the website visit the user's browser returns the cookie previously saved on the hard drive by the service provider that sent it.

You can connect the current visit with previous ones, however, since cookies are linked to the domain, only for this able with respect to its own content. Cookies are not able to identify the user by themselves, only the visitor are suitable for recognizing your computer.

The website's own cookie management

The purpose of data management:

Identification of users, distinguishing them from each other, and the current session of the users

identification, storage of the data provided in the process, prevention of data loss, identification of users, tracking, web analytics measurements.

Legal basis for data management:

The data controller has a legitimate interest in identifying users and providing customized service [GDPR Article 6 (1) para. (f)].

Scope of processed personal data:

Identification number, date, time, and the previously visited page.

Duration of data management:

(permanent) cookies with an exact validity period until they are deleted, but at the latest until their validity period expires are stored on the computer.

Data processors:

- GLOBUS SOFTWARE DEVELOPMENT COMPANY SRL Data processing task: operation of websites, development, maintenance and development of databases

Cookies used by external service providers on websites

The html code of the portals is independent of Energofish Kft., links coming from an external server and pointing to an external server contain. The server of the external service provider is directly connected to the user's computer. We invite our visitors.

Please note that the providers of these links are a direct connection to their server with the user's browser user data due to direct communication (e.g. IP address, browser, operating system data, mouse pointer movements, the address of the page visited and the time of the visit) are able to collect.

Content that may be personalized for the user is served by the server of the external service provider. The data is external.

The data controllers listed below can provide detailed information about the handling by the service providers' servers.

The independent measurement and auditing of the visitor and other web analytics data of our websites as an external service provider

Powered by Google Analytics™ server.

The data manager provides detailed information on the management of measurement data at <https://www.google.com/intl/hu/policies/>

The code of the service provider available at <https://facebook.com> has been placed on the website.

The purpose of data management:

Tracking the website visitors' activities, providing personalized content, providing personalized content related to interests, increasing the user experience.

Legal basis for data management:

Voluntary consent of the person concerned.

Cookies used:

Süti neve	Célja	Kategória	Tárolási idő
_greaptcha	Annak megállapítására, hogy robot vagy ember használja az oldalt (Google™ ReCaptcha™ biztonsági kód). gstatic.com	Működéshez fontos	persistent
_GRECAPTCHA	Annak megállapítására, hogy robot vagy ember használja az oldalt (Google™ ReCaptcha™ biztonsági kód). google.com	Működéshez fontos	180 days
CONSENT	Youtube.com™ beágyazott videó esetén cookie elfogadásra kattintás	Működéshez fontos	2 years
PHPSESSID	A weboldal működéséhez szükséges, hogy a felhasználó kliens megfelelően kiszolgálható legyen.	Működéshez fontos	session
rc::a	Annak megállapítására, hogy robot vagy ember használja az oldalt (Google™ ReCaptcha™ biztonsági kód). gstatic.com	Működéshez fontos	persistent
rc::b	Annak megállapítására, hogy robot vagy ember használja az oldalt (Google™ ReCaptcha™ biztonsági kód). gstatic.com	Működéshez fontos	session
rc::c	Annak megállapítására, hogy robot vagy ember használja az oldalt (Google™ ReCaptcha™ biztonsági kód). gstatic.com	Működéshez fontos	session
test_cookie	A Google™ által használt süti annak megállapítására, hogy a böngésző támogatja-e a sütik tárolását.	Működéshez fontos	1 day
__qca	Optimális weboldal tartalom nyújtása végett felhasználók látogatási adatainak gyűjtése (mint látogatási alkalom, átlagos eltöltött idő az oldalakon). e.issuu.com	Működéshez fontos	1 year
__qca	Optimális weboldal tartalom nyújtása végett felhasználók látogatási adatainak gyűjtése (mint látogatási alkalom, átlagos eltöltött idő az oldalakon). quantserve.com	Statisztika	persistent
_dc_gtm_UA-#	Statisztikai elemzésre szolgál a Google Tag Manager™ által.	Statisztika	1 day

Süti neve	Célja	Kategória	Tárolási idő
_dlt	Egyedi azonosító biztosítása a látogatói viselkedés statisztika méréséhez. e.issuu.com	Statisztika	1 day
_dlt	Egyedi azonosító biztosítása a látogatói viselkedés statisztika méréséhez. issuu.com	Statisztika	1 day
_ga	Egyedi azonosító biztosítása a látogatói viselkedés statisztika méréséhez. Google™ Analytics™	Statisztika	2 years
_gid	Egyedi azonosító biztosítása a látogatói viselkedés statisztika méréséhez. Google™ Analytics™	Statisztika	1 day
collect	Statisztikai adatok küldése a Google™ Analytics™-nek a látogató eszközéről és látogatói viselkedéséről.	Statisztika	session
cqSes	Optimális weboldal tartalom nyújtása végett felhasználók látogatási adatainak gyűjtése (mint látogatási alkalom, átlagos eltöltött idő az oldalakon). quantserve.com	Statisztika	session
_fbp	Facebook™ termék hirdetés valós idejű megjelenítése harmadik fél hirdetőtől.	Marketing	3 months
_gcl_au	Google™ AdSense™ webhelyek közötti hirdetési hatékonyság méréséhez.	Marketing	session
ads/ga-audiences	Kurzor figyelése, hogy a látogató elhagyni szándékozik-e az oldalt, ez lehetővé teszi a weboldalnak, hogy előugró ablakokat indítson el, a látogató megtartása és vásárlóvá alakítása céljából. google.com	Marketing	session
ads/ga-audiences	Kurzor figyelése, hogy a látogató elhagyni szándékozik-e az oldalt, ez lehetővé teszi a weboldalnak, hogy előugró ablakokat indítson el, a látogató megtartása és vásárlóvá alakítása céljából. google.ie	Marketing	session
fr	Facebook™ termék hirdetés valós idejű megjelenítése harmadik fél hirdetőtől.	Marketing	3 months
IDE	Hirdetés kattintások mérése a Google™ DoubleClick™-kel, a hirdetések hatékonyságának növelése és célirányos hirdetések nyújtása céljából.	Marketing	1 year
iutk	Azonosítja a látogató eszközt és hogy mely Issuu dokumentumot olvasta. issuu.com	Marketing	session
LAST_RESULT_ENTRY_KEY	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	session
LogsDatabaseV2: Vacc4d5cf #LogsRequestsStore	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	persistent
LogsDatabaseV2: Vec221ef3 #LogsRequestsStore	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	persistent
mc	Adatokat gyűjt a felhasználó webhely látogatásairól (pl.: milyen oldalakat töltött be). Az adatokat célzott hirdetésekhez használja fel. quantserve.com	Marketing	13 months

Süti neve	Célja	Kategória	Tárolási idő
nextId	Annak meghatározása, hogy a beágyazott Youtube™ videó után mely következőt kell lejátszani.	Marketing	session
NID	A látogató által használt eszköz meghatározásához kötött egyedi azonosító. google.com	Marketing	6 months
optiMonkClientId	Információk gyűjtése arról, hogy a látogató milyen termékeket nézett meg, mi van a kosarában, ezeket segítik, hogy a jobb konverziós ráta elérése érdekében célirányosabb reklámokat és termékajánlásokat lehessen küldeni az ügyfeleknek. OptiMonk™	Marketing	1 year
OptiMonk VisitorAttributes	OptiMonk™ felugró ablak létrehozása a weboldalakon.	Marketing	persistent
prism_#	Felhasználói interakcióinak gyűjtése. Active Campaign. pecaplaza.hu	Marketing	30 days
prism_#	Felhasználói interakcióinak gyűjtése. Active Campaign. prism.app-us1.com	Marketing	30 days
remote_sid	Youtube™ videó szolgáltatás funkcióhoz szükséges.	Marketing	session
requests	Youtube™ videó szolgáltatás funkcióhoz szükséges.	Marketing	session
ServiceWorkerLogs Database#SWHealthLog	Segít a böngésző vagy a weboldal által indított események kezelésében	Marketing	persistent
TESTCOOKIESENABLED	Nincs besorolása. Youtube™	Marketing	1 day
VISITOR_INFO1_LIVE	Megpróbálja megbecsülni a felhasználók sávszélességét a beágyazott YouTube™-videókat tartalmazó oldalakon.	Marketing	180 days
YSC	Egyedi azonosító biztosítása statisztikához, hogy a felhasználó mely videókat tekintett meg Youtube™-on.	Marketing	session
yt.innertube::nextId	Egyedi azonosító biztosítása statisztikához, hogy a felhasználó mely videókat tekintett meg Youtube™-on.	Marketing	persistent
ytidb::LAST_RESULT_ENTRY_KEY	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	persistent
YtidbMeta#databases	Nincs besorolása. Youtube™	Marketing	persistent
yt-remote-cast-available	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	session
yt-remote-cast-installed	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	session
yt-remote-connected-devices	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	persistent
yt-remote-device-id	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	persistent
yt-remote-fast-check-period	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	session
yt-remote-session-app	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	session
yt-remote-session-name	Youtube™ beágyazott videók beállításainak megjegyzésére.	Marketing	session

Süti neve	Célja	Kategória	Tárolási idő
energofish_hu	Nincs besorolása. energofish.hu webserver	Nem kategorizált	180 days
pagead/1p-user-list/921684617/	Nincs besorolása. google.com	Nem kategorizált	session
pagead/1p-user-list/921684617/	Nincs besorolása. google.ie	Nem kategorizált	session
pecaplaza_figyelo	Nincs besorolása. pecaplaza.hu	Nem kategorizált	180 days
td	Nincs besorolása. googletagmanager.com	Nem kategorizált	session

13. Data security

The Data Controller takes technical, organizational and organizational measures in view of the current state of technology ensures the protection of the security of data management, which is the risk arising in connection with data management provides an adequate level of protection.

We choose and operate the IT tools used to manage personal data in such a way that the managed data: accessible to those authorized to do so (availability); its authenticity and authentication are ensured (authenticity of data management); its immutability can be verified (data integrity); protected against unauthorized access (data confidentiality).



We protect the data with appropriate measures against accidental or illegal destruction, loss, alteration, against damage, unauthorized disclosure or unauthorized access. For personal data access is restricted by specifying authorization levels. We protect IT systems with a firewall and we provide virus protection. In the course of electronic data management, we ensure that the data is only used for a purpose, under controlled conditions, only those persons who need to do so in order to perform their duties have access to it they need. It is suitable for the protection of data files managed electronically in our various registers with a technical solution, we ensure that the stored data - unless permitted by law - is not directly they can be connected and assigned to the person concerned.

The Data Controller keeps a record of any data protection incidents, indicating the data protection incident related to it facts, its effects and the measures taken to remedy it. Any data protection incident is handled by the Data Controller without delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, reports to the National Data Protection and Freedom of Information Authority, unless the data protection incident probably does not pose a risk to the rights and freedoms of natural persons.

14. The rights of data subjects and the conditions for their enforcement

We can request the correction, restriction, or deletion of our data at any time, and we can also request full data management specific information. We can also ask that you share our personal data broadly in accordance with the law we transfer it in a machine-readable format, or transfer our data to another data controller.

If you feel that Energofish Kft. violated the law during data management, the National can initiate an investigation.

Data Protection and Freedom of Information Authority (NAIH) with reference to the handling of personal data.

In connection with this, a violation of rights has occurred or there is an immediate risk of such violation, but we are happy to receive your complaint would be the first to contact us to investigate and remedy it as soon as possible.

NAIH contact details:**Headquarters:** 9-11. Falk Miksa str., Budapest, 1055 Hungary**Postal address:** 1363 Budapest, Pf.: 9.**E-mail:** ugyfelszolgalat@naih.hu**Website:** www.naih.hu

If, in your opinion, your rights have been violated during data processing, you may choose your place of residence. You can apply to a competent tribunal, i.e. a court, according to your location. More information about the court procedure can be found at birosag.hu you can find out on the website.

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