

Privacy Policy

To use the services available on the **MOONVALLEY WINES Ltd.** webshop at <https://holdvolgy.com>, it is necessary for our users to provide certain personal data.

This Privacy Policy (hereinafter referred to as "Policy") includes the fundamental principles, purposes, and other relevant facts that define the objectives, duration, and methods of personal data processing, as well as the rights and legal remedies available to Users in relation to data processing.

Definitions

Data Processing: Any operation or set of operations performed on personal data on behalf of the Data Controller, regardless of the method, tool, or location of execution, provided that it pertains to the data. Accordingly, a processor is any natural or legal person, public authority, agency, or other body that processes personal data on behalf of the Data Controller.

Data Processing: Any operation or set of operations performed on personal data, such as collection, recording, organization, storage, alteration, use, retrieval, transfer, disclosure, alignment, restriction, erasure, or destruction, irrespective of the procedure applied.

Data Controller: MOONVALLEY WINES Ltd. (hereinafter referred to as "MOONVALLEY WINES Ltd.") is the entity responsible for decisions and execution regarding the personal data of Users.

Data Controller's Details:

- **Registered Office and Mailing Address:** 3909 Mád, Batthyány Street 69.
- **Company Registration Number:** 05-09-023786 (registered at the Court of Registration of the Miskolc Tribunal)
- **Tax Number:** 13823258-2-05
- **Email:** contact@holdvolgy.com

Service: The services available to the User via the Website, including purchasing options in the webshop.

User or Data Subject: Any natural person using the services of MOONVALLEY WINES Ltd., whose personal data is processed by the Data Controller.

Personal Data: Any information relating to the User that identifies or can identify them, such as name, number, location, online identifier, or other specific characteristics.

Computer: Any device (as defined in Section 188(21) of Act C of 2003 on Electronic Communications) capable of receiving cookies, such as computers, mobile phones, or tablets, under the User's control.

GDPR: The General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC.

Cookie: A file (data package) created on the User's computer by the software displaying the Website, storing information about the User, the connection between the User and the web server. The purpose of cookies is to identify the User's device, facilitate navigation, track usage, and analyze behavior to enhance the User experience.

Website: <https://holdvolgy.com>

Data Protection Authority: National Authority for Data Protection and Freedom of Information (Hungary)

- **Address:** 1125 Budapest, Szilágyi Erzsébet fasor 22/c
- **Email:** ugyfelszolgalat@naih.hu
- **Website:** <http://naih.hu>
- **Phone:** +36 (1) 391-1400

Principles of Personal Data Processing

Personal data must:

- a. Be processed lawfully, fairly, and transparently for the Data Subject (“lawfulness, fairness, and transparency”).
- b. Be collected for specified, explicit, and legitimate purposes, and not further processed in a manner incompatible with those purposes; further processing for public interest, scientific or historical research, or statistical purposes is not considered incompatible with the original purpose (“purpose limitation”).
- c. Be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed (“data minimization”).
- d. Be accurate and, where necessary, kept up-to-date; reasonable steps must be taken to ensure that inaccurate personal data are erased or rectified without delay (“accuracy”).
- e. Be stored in a form that permits identification of Data Subjects only for as long as necessary for the purposes of processing; longer storage is permitted only for public interest archiving, scientific or historical research, or statistical purposes under safeguards (“storage limitation”).
- f. Be processed in a manner that ensures appropriate security of the data, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, using appropriate technical or organizational measures (“integrity and confidentiality”).
- g. The Data Controller is responsible for compliance with these principles and must be able to demonstrate adherence (“accountability”).

The Data Controller declares that its data processing activities comply with the principles outlined in this section.

Data Processing Purposes and Procedures

Registration:

- **Data Collected:** Last name, first name, email address, username, password.
- **Purpose:** To enable the User to access services and for the Data Controller to fulfill its contractual obligations.
- **Duration of Data Processing:** Until the conditions in Article 17(1) of the GDPR are met or until the User requests deletion. Upon registration deletion, all personal data is immediately erased. The Data Controller provides electronic confirmation of data deletion under Article 19 of the GDPR. If the deletion request includes the User’s email address, the registration and email address are both deleted after notification.
- **Legal Basis:** GDPR Article 6(1)(a) and (b).

Purchases:

- **Data Used:** Data provided during registration. For purchases without registration, required data includes phone number, billing and shipping address, company name, and tax number for corporate orders.
- **Purpose:** To fulfill the User’s orders and the contractual obligations of the Data Controller.

Duration of Data Processing and Deadline for Data Deletion:

If any of the conditions outlined in Article 17(1) of the GDPR are met, data processing continues only until the data subject requests deletion. The Data Controller informs the data subject electronically of the deletion of any personal data in accordance with Article 19 of the GDPR. If the data subject's deletion request includes their email address, the Data Controller will delete the email address following the notification. However, accounting records must be retained for eight years under Section 169(2) of Act C of 2000 on Accounting. Contractual data may be deleted after the expiration of the statutory limitation period under civil law based on the data subject's deletion request. Accounting documents that directly or indirectly support bookkeeping (including general ledger accounts, analytic, or detailed records) must be retained in a readable and retrievable format for at least eight years, based on bookkeeping references.

- **Legal Basis:**

- GDPR Article 6(1)(b) and (c).
- Section 13/A(3) of Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services.

The service provider may process personal data that is technically essential for the provision of the service. When selecting and operating the tools used to provide information society services, the service provider must ensure that personal data is processed only when it is strictly necessary for the provision of the service and for the fulfillment of other purposes defined by this law. Even in such cases, data processing must be limited to the necessary scope and duration.

For claims arising from the contract, the statute of limitations is five years under Section 6:21 of Act V of 2013 on the Civil Code.

Section 6:22 [Statute of Limitations]

Unless otherwise provided by this Act, claims shall lapse after five years.

The limitation period begins when the claim becomes due.

Any agreement to modify the limitation period must be in writing.

Any agreement excluding the statute of limitations is null and void.

Newsletter Database:

Data Collected: Last name, first name, email address (optional: country, city).

Purpose of Data Processing:

The Data Controller aims to periodically contact Users via their email addresses regarding current events, promotions, program offers, and other information related to its services, in accordance with Section 6 of Act XLVIII of 2008 on the Fundamental Requirements and Certain Restrictions of Commercial Advertising Activities (hereinafter referred to as "Grt.").

This data processing is based on the User's explicit and voluntary consent, which is provided through a separate statement or by submitting personal data for this purpose. According to Section 6(3) of the Grt., the Data Controller is entitled to process data until the User withdraws their consent.

By consenting, the User agrees to receive SMS or email messages related to the Data Controller's services for the purposes outlined in this section.

Personal Data Processed for the General Newsletter Service:

- Name
- Email address

The User can optionally indicate whether they wish to subscribe to the newsletter.

Right to Unsubscribe:

Subscription can be revoked at any time, without limitation or explanation, free of charge, by clicking the "If you no longer wish to receive newsletters, please click here" link at the bottom of the newsletter or by sending a message to contact@holdvolgy.com.

Legal Basis for Data Processing:

The User's voluntary, explicit, and informed consent under GDPR Article 6(1)(a) and (f), and Section 6(5) of the Grt.:

- Advertisers, advertising service providers, and advertising publishers must maintain records of personal data of individuals who have provided consent for advertising purposes.
- Data recorded in these records may only be processed as per the consent provided, until it is withdrawn, and shared with third parties only with the prior consent of the individual concerned.

Duration of Data Processing:

The Data Controller does not send unsolicited advertising messages. If the User unsubscribes, the Data Controller deletes all personal data necessary for sending newsletters or advertising messages and refrains from further advertising communications.

Technical Data (Cookies):

When using the Website, technical data (cookies) generated by the User's device are recorded automatically. These data are used for statistical purposes, to improve the IT system of the Website, and to enhance the user experience.

Cookies are not linked with the User's personal data by the Data Controller, except where required by law. Access to these cookies is restricted to the Data Controller and its IT personnel. Users can delete cookies from their devices or disable their use via browser settings. However, disabling cookies may limit the full functionality of the Website.

The Data Controller uses the following services involving cookies:

The Data Controller uses the "Google Ads" online solution and within its framework utilizes Google's conversion tracking service. Google Conversion Tracking is an analytical service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When the Data Subject accesses a website via a Google advertisement, a cookie necessary for conversion tracking is placed on their device. These cookies have a limited validity and do not contain any personal data, thus the Data Subject cannot be identified through them.

The information collected using conversion tracking cookies is used to generate conversion statistics for Users who opt for AdWords conversion tracking. Users can learn how many people clicked on their ads and were redirected to pages with conversion tracking tags, as well as the total value of purchases. However, no information is obtained that could identify any individual User.

If you do not wish to participate in conversion tracking, you can disable cookies in your browser settings. In this case, you will not be included in the conversion tracking statistics.

For further information, including Google's privacy policy, please visit:
www.google.de/policies/privacy/.

The Website uses Google Analytics, a web analytics service provided by Google. Google Analytics utilizes "cookies," which are text files stored on the User's computer to facilitate the analysis of how the Website is used by the User.

The information generated by the cookies regarding the User's use of the Website is typically transmitted to and stored on a Google server in the United States. By enabling IP anonymization on the Website, Google truncates the User's IP address within the member states of the European Union or other parties to the Agreement on the European Economic Area. The full IP address is transmitted to and shortened on a Google server in the United States only in exceptional cases.

On behalf of the Website operator, Google uses this information to evaluate how the User interacts with the Website, compile reports on Website activity, and provide other services related to Website and Internet usage.

Within the framework of Google Analytics, the IP address transmitted by the User's browser is not merged with other data held by Google.

The User can prevent cookies from being stored on their device by selecting the appropriate settings in their browser. However, please note that in this case, certain functionalities of the Website may not operate fully.

Additionally, the User can prevent Google from collecting and processing data generated by cookies related to their Website usage (including their IP address) by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

The Data Controller uses the "Facebook Meta Business" online advertising program and its conversion tracking service, provided by Facebook Inc. (1601 Willow Road, Menlo Park, CA 94025, United States; "Facebook").

When the Data Subject accesses a website via a Facebook advertisement, a cookie required for conversion tracking is placed on their device. These cookies have a limited validity and do not contain any personal data, meaning that the Data Subject cannot be identified through them.

The information collected using conversion tracking cookies is used to generate conversion statistics for Users who opt for Facebook conversion tracking. Users can learn how many people clicked on their advertisements and were redirected to pages with conversion tracking tags, as well as the total value of purchases. However, no information is obtained that could identify any individual User.

If you do not wish to participate in conversion tracking, you can disable cookies in your browser settings. In this case, you will not be included in the conversion tracking statistics.

For further information, including Facebook's privacy policy, please visit:
<https://www.facebook.com/privacy/explanation>.

Data Transfer:

The Data Controller informs Users that their personal data may be transferred to the following companies for the delivery of ordered products and the issuance of accounting documents:

- **Sprinter Futárszolgálat Kft.**

- Address: 1097 Budapest, Könyves Kálmán körút 34
- Company Registration Number: 01-09-432531
- **Magyar Posta Private Limited Company by Shares:**
 - Tax Number: 10901232-4-44
 - Address: Budapest, Dunavirág utca 2-6

The purpose of the data processing is to fulfill Users' orders and comply with accounting obligations (invoice issuance).

The Data Controller is required to provide information, disclose data, transfer data, or make documents available to courts, prosecutors, administrative authorities, investigative bodies, or other authorized entities as mandated by law. Such data provision is limited to the minimum amount necessary to fulfill the purpose identified by the requesting authority, provided that the authority specifies the exact scope of data and the purpose. The Data Controller cannot be held liable for fulfilling these legally mandated data transfers or for any consequences arising from such disclosures.

Data	Retention	Period:
Data is processed until the conditions outlined in Article 17(1) of the GDPR are met or until the data subject requests deletion. The Data Controller notifies the data subject electronically of the deletion of any personal data, as required under Article 19 of the GDPR. If the deletion request includes the data subject's email address, the email address is also deleted following notification. However, accounting documents must be retained for eight years in accordance with Section 169(2) of Act C of 2000 on Accounting. Contractual data may be deleted upon the expiration of the statutory limitation period under civil law based on the data subject's deletion request.		

Legal Basis for Data Processing:

- GDPR Article 6(1)(b) and (c)
- Section 13/A(3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce and Information Society Services
- The Data Controller informs Users that it uses the systems of **The Rocket Science Group LLC (Mailchimp)**, located at 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, as a data processor. The company is considered a reliable data processor under the Trans-Atlantic Data Privacy Framework.
- **Purpose of Data Processing:**
The purpose of the data processing is to provide the newsletter service.
- **Duration of Data Processing:**
Data is processed until the conditions outlined in Article 17(1) of the GDPR are met or until the data subject requests deletion. The Data Controller notifies the data subject electronically of the deletion of any personal data, as required under Article 19 of the GDPR.
- **Legal Basis for Data Processing:**
The User's voluntary, explicit, and informed consent in accordance with GDPR Article 6(1)(a) and (f).

Additional Data Processors:

KISZERVEZETT MARKETING KFT

- **Address:** Tésa, Petőfi Street 16, 2636, Hungary
- **Purpose of Data Processing:** Operation and maintenance of the Website.
- **Duration of Data Processing:** Data is processed until the conditions outlined in Article 17(1) of the GDPR are met or until the data subject requests deletion.
- **Legal Basis for Data Processing:** GDPR Article 6(1)(b) and (c).

MICROFOX INFORMATIKAI KFT – MOZAIK PROGRAM

- **Address:** 5500 Gyomaendrőd, Rákóczi Street 3
- **Data Transferred by the Data Controller:** Name, shipping address, tax number, phone number.
- **Purpose of Data Processing:** Fulfillment of User orders and compliance with accounting obligations (invoice issuance).

Obligatory Data Disclosures:

The Data Controller is required to provide information, disclose data, transfer data, or make documents available to courts, prosecutors, administrative authorities, investigative bodies, or other authorized entities as mandated by law. Such data provision is limited to the minimum amount necessary to fulfill the purpose identified by the requesting authority, provided that the authority specifies the exact scope of data and the purpose.

The Data Controller cannot be held liable for fulfilling these legally mandated data transfers or for any consequences arising from such disclosures.

Duration of Data Processing:

Data is processed until the conditions outlined in Article 17(1) of the GDPR are met or until the data subject requests deletion. The Data Controller notifies the data subject electronically of the deletion of any personal data, as required under Article 19 of the GDPR.

If the deletion request includes the data subject's email address, the email address is also deleted following notification. However, accounting documents must be retained for eight years under Section 169(2) of Act C of 2000 on Accounting. Contractual data may be deleted upon the expiration of the statutory limitation period under civil law based on the data subject's deletion request.

Legal Basis for Data Processing:

- GDPR Article 6(1)(b) and (c).

RIGHTS AND REMEDIES

Right to Information

The User can contact the Data Controller via email (contact@holdvolgy.com) or post (3909 Mád, Batthyány Street 69) to request confirmation of whether their personal data is being processed. If data processing is in progress, the User has the right to access their personal data and the following information:

- The purposes of data processing;
- The categories of personal data being processed;
- The recipients or categories of recipients to whom personal data has been disclosed;
- The planned duration of data storage or the criteria for determining this duration;
- The User's rights related to data processing;
- The right to lodge a complaint with a supervisory authority;
- The source of the collected data and the legal basis for processing.

The Data Controller is required to provide the requested information without undue delay, but no later than one month from the date of the request.

The Data Controller will make a copy of the personal data subject to processing available to the User upon request. For additional copies requested by the User, the Data Controller may charge a reasonable administrative fee.

The Data Controller will only review and respond to emails related to data processing if the email is sent from the email address previously provided by the User (unless the User indicates a change of email address in the message, or the User's identity is otherwise clearly identifiable from the message).

The Data Controller will inform the User without undue delay, but no later than one month after taking action on any personal data-related measures.

If the Data Controller does not take action in response to the User's request, it will inform the User without undue delay, but no later than one month from the receipt of the request, about the reasons for not taking action. The Data Controller will also inform the User of their right to lodge a complaint with the Authority and seek judicial remedy.

Right to Rectification

The User has the right to notify the Data Controller of any changes to their personal data (via email or postal mail as outlined above). The Data Controller will process the data change request within 8 days of receiving it. If the User fails to promptly report changes to their personal data, the consequences of such failure must be borne by the User. If the provided personal data is inaccurate and the accurate personal data is available to the Data Controller, the Data Controller will automatically correct the personal data.

Right to Erasure

The User has the right to request the erasure of their personal data without undue delay if:

- The personal data is no longer necessary for the purpose for which it was collected;
- The User withdraws consent, and no other legal basis for processing exists;
- The User objects to processing based on legitimate interest;
- The personal data has been processed unlawfully;
- Erasure is required by a legal obligation.

Requests for deletion can be submitted via the "My Account" section after logging in or by emailing contact@holdvolgy.com.

The Data Controller may retain data despite a deletion request if it is necessary for:

- Exercising the right to freedom of expression and information;
- Compliance with a legal obligation or public interest;
- Archiving, scientific, or historical research purposes;
- Establishing, exercising, or defending legal claims.

Right to Object to Processing

The User may object to the processing of their personal data based on legitimate interests, including for marketing purposes. In such cases, the Data Controller will no longer process the personal data unless it demonstrates compelling legitimate grounds that override the User's interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

Right to Restriction of Processing

The User has the right to request that the Data Controller restrict data processing if any of the following conditions are met:

- a) The User disputes the accuracy of their personal data; in this case, the restriction applies for the period necessary for the Data Controller to verify the accuracy of the personal data.
- b) The data processing is unlawful, and the User opposes the deletion of their personal data, requesting instead that its use be restricted.
- c) The Data Controller no longer needs the personal data for the purposes of data processing, but the User requires it for the establishment, exercise, or defense of legal claims.
- d) The User has objected to the data processing; in this case, the restriction applies for the period necessary to determine whether the Data Controller's legitimate grounds override those of the User.

If data processing is restricted under the conditions above, the restricted personal data may only be processed (except for storage) with the User's consent or for the establishment, exercise, or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest.

If the restriction on data processing is lifted, the Data Controller will notify the User who requested the restriction in advance.

Right to Data Portability

The User has the right to receive the personal data they have provided to the Data Controller in a structured, commonly used, and machine-readable format. The User may also request that the Data Controller transfer this data to another data controller, provided that processing is based on consent or is necessary for the performance of a contract.

Filing a Complaint with the Supervisory Authority

The User may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) to initiate an investigation on the grounds that a violation has occurred or there is an imminent risk of a violation concerning the processing of their personal data. The Authority's investigation is free of charge, and the costs of the investigation are advanced and borne by the Authority. No one may suffer any disadvantage as a result of filing a complaint with the Authority. The identity of the complainant may only be disclosed by the Authority if the investigation cannot be conducted without such disclosure. However, if the complainant requests it, their identity must not be disclosed, even if the investigation cannot proceed without such disclosure.

Judicial Remedies

The User may bring legal action against the Data Controller if their rights are infringed. The case will be adjudicated by the court of the Data Controller's registered office, unless the User chooses to bring the case before the court of their residence or domicile. Information on court jurisdiction can be found on the www.birosag.hu website.

Compensation and Damages

If the Data Controller unlawfully processes personal data or breaches data security requirements, it is liable for:

- **Damages:** For any harm caused to the User or third parties.
- **Non-material Damages:** For violations of the User's personality rights.

The Data Controller is exempt from liability if it proves that the harm or violation occurred due to unavoidable external factors beyond its control. Damages or compensation are not payable if the harm results from the User's deliberate or grossly negligent actions.

Restrictions

The User's rights defined in this Policy may be restricted by applicable laws where necessary and proportionate for purposes such as:

- National security;
- Defense;
- Public safety;
- Prevention, investigation, or prosecution of criminal offenses;
- Important public interests, including financial, economic, or tax matters;
- Protection of judicial independence and proceedings;
- Prevention of ethical misconduct in regulated professions;
- Monitoring and oversight of public authorities;
- Protection of the rights and freedoms of others;
- Enforcement of civil claims.

Miscellaneous Provisions

The Data Controller reserves the right to unilaterally amend this Policy at any time.

The provisions of Hungarian law apply to this Policy.

This Policy takes effect on **xxx** November 2024. and is available on the Website at <https://holdvolgy.com>.