Faberland Ltd.
2119 Pécel, Pesti út 3. Hungary
+36 70 723 23 26
Tax No: HU22926627
sales@faberland.hu
www.faberland.com

PRIVACY NOTICE
regarding the data processing carried out on the www.faberland.com website
effective from: 12 June 2025

TARTALOM

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1. INTRODUCTION

FABERLAND Ltd. processes the personal data[1] provided to it in accordance with the applicable legal regulations[2] and takes all necessary technical and organizational measures to ensure appropriate and secure data management at all times.
This Privacy Notice (hereinafter: the "Privacy Notice" or "Notice") presents the characteristics of data collection, storage, and usage related to the data processing activities carried out via the website operated by the Data Controller at www.faberland.com (hereinafter: the "website") and through the contact options (email, telephone number) available in the "Contact" menu.

This Notice enters into force upon its publication. The Data Controller reserves the right to unilaterally modify the Notice. Any amendments shall enter into effect upon publication at the above address.

Please also read our Cookie Notice available on this website, which provides detailed information on the types of cookies used, their purposes, and your options for granting or refusing consent.

By using the website, the user (hereinafter: the "User" or "Data Subject") accepts the content of this Notice and consents to the data processing activities described below.

2. DATA CONTROLLER, CONTACT DETAILS

2.1. Details of the Data Controller[3]

[1] **"personal data"** means any information relating to an identified or identifiable natural person ("data subject") [GDPR Article 4, Point 1].
[2] pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR) and Section 16 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.)
[3] „d**ata controller**" is the natural or legal person who determines, alone or jointly with others, the purposes and means of the processing of personal data. [GDPR – Article 4, Point 7.]

Name of the Service Provider: FABERLAND Ltd.

Registered office: 2119 Pécel, Pesti út 3., Hungary

Company registration number: 13-09-140149

Tax number: 22926627-2-13

2.2. Representative and Contact Information of the Data Controller

Representative: Tibor Bálint, Managing Director

Email address: faberland@faberland.hu

Telephone number: +36-70/677-72-70

2.3. Data Processors

In the course of its data processing activities, the Data Controller may engage additional companies to help achieve the purposes of processing. In such cases, the cooperating partner company participates as a Data Processor[4] in handling personal data.

The Data Controller uses the following Data Processors for its data processing activities. These partners may access personal data exclusively to the extent necessary and solely within the scope of their contractual engagement with the Data Controller:

Type of Data Processor	**Name**	**Contact / Privacy Policy**
Hosting Provider	ELIN.hu Ltd.	1131 Budapest, Dolmány Street 30.
Web Development Company	Ötletiroda Ltd.	2119 Pécel, Iharos Street 23.
Email System Operator	Microsoft	https://learn.microsoft.com/en-us/microsoft-365/compliance/gdpr
Newsletter Service Provider	MailerLite	https://www.mailerlite.com/legal/privacy-policy

3. DATA PROCESSING ACTIVITIES RELATED TO THE WEBSITE

This Notice provides information on data processing activities in which natural persons in contact with the Data Controller may be affected in connection with the Website. These activities include:

- Data processed during contact initiated by the user
- Data processed when subscribing to the newsletter
- Data processed via social media platforms

[4] **"Processor"**: a natural or legal person, public authority, agency or other body which processes personal data **on behalf of the controller**. [GDPR – Article 4, Point 8]

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The Data Controller does not use automated decision-making, does not carry out profiling, and does not transfer data to third countries or international organizations.

3.1. Data Processed During Contact Initiation

If a data subject contacts us through the email addresses or contact form provided on the website, data will be processed as follows:

3.1.1. Contact via Email

Management of email inquiries and responding to questions. The legal basis depends on the specific situation.

Legal Basis of Data Processing	In the case of email inquiries, the legal basis for data processing is Article 6(1)(b) of the GDPR – taking steps at the request of the data subject prior to entering into a contract – or, in certain cases, the legitimate interest under point (f), supported by a legitimate interest assessment.
Scope of Data Subjects	Natural persons who initiate contact with the Data Controller via the email address available on the Controller's website.
Categories of Personal Data Processed	Name, email address, content of the message, attachments
Retention Period	In case of contractual relationship: 5 years; general inquiry: up to 1 year
Method of Processing	Electronic correspondence via the Data Controller's internal email system.
Source of the Data	Data provided directly by the data subject.
Recipients of Personal Data	Managers of the Data Controller and employees assigned to handle the matter.
Data Processors	Microsoft

3.1.2. Contact via the Website

After filling in the contact form, the data subject's inquiry is processed, questions are answered, and offers may be sent.

Legal Basis of Data Processing	Pursuant to Article 6(1)(a) and (b) of the GDPR: the processing is based, on the one hand, on the data subject's consent, and on the other hand – if the purpose of the processing is to provide a quotation or prepare a contractual relationship – on taking steps at the data subject's request prior to entering into a contract.
Scope of Data Subjects	Natural persons who initiate contact with the Data Controller via the contact form available on the Controller's website.

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Categories of Personal Data Processed	Name, email address, name of company/institution, telephone number, content of the message
Retention period	A maximum of 6 months, unless a contract is concluded – in such case, data processing continues under a separate Privacy Notice.
Method of Processing	Contact initiated electronically through the website by completing the contact form.
Source of the Data	Data provided directly by the data subject.
Recipients of Personal Data	The managers of the Data Controller and employees assigned to handle the matter.
Data processors	The web development company responsible for website maintenance and the hosting service provider.

3.2. Newsletter Subscription

The Controller provides the possibility on the Website for users to subscribe to a newsletter.
Through this subscription, any data subject may receive electronic messages, allowing them to stay informed about the professional articles and news published on the Website and to receive firsthand updates about current offers.
The data subject may unsubscribe from receiving newsletters at any time, without any restriction or justification. Unsubscription can be done by clicking the "Unsubscribe" link in the newsletter or by submitting a deletion request to the Controller (via email or by post). In such cases, the Controller will no longer send newsletters or promotional offers to the data subject.

Legal Basis of Data Processing	Pursuant to Article 6(1)(a) and (b) of the GDPR: the processing is based, on the one hand, on the data subject's consent, and on the other hand – if the purpose of the processing is to provide a quotation or prepare a contractual relationship – on taking steps at the data subject's request prior to entering into a contract.
Scope of Data Subjects	Natural persons who initiate contact with the Data Controller via the contact form available on the Controller's website.
Categories of Personal Data Processed	Name, email address, name of company/institution, telephone number, content of the message
Description	After filling in the contact form, the data subject's inquiry is processed, questions are answered, and offers may be sent.
Retention Period	A maximum of 6 months, unless a contract is concluded – in such case, data processing continues under a separate Privacy Notice.
Method of Processing	Contact initiated electronically through the website by completing the contact form.
Source of the Data	Data provided directly by the data subject.
Recipients of Personal Data	The managers of the Data Controller and employees assigned to handle the matter.
Data Processors	The web development company responsible for website maintenance and the hosting service provider.

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3.3. Data Processed via Social Media Platforms

The Data Controller operates official pages on Facebook and LinkedIn. When using these platforms, the data subject independently decides to share personal data (e.g., comments, private messages, profile pictures). Data processing on these platforms is governed by the respective privacy policies and terms of use of each platform:

- Facebook: https://www.facebook.com/privacy/explanation
- LinkedIn: https://www.linkedin.com/legal/privacy-policy

Purpose of Data Processing	The Data Controller uses statistics and feedback generated on these platforms for marketing and communication purposes.
Legal Basis of Data Processing	Article 6(1)(a) and (f) of the GDPR – i.e., the data subject's consent, and the legitimate interest of the Data Controller. The Controller has conducted a legitimate interest assessment and concluded that the data processing does not infringe upon the fundamental rights and freedoms of data subjects and is proportionate to the intended purpose.

4. RIGHTS OF THE DATA SUBJECTS

Data subjects are entitled to exercise the following rights in relation to the data processing activities described in this Notice:

- the right to be informed,
- the right of access,
- the right to rectification,
- the right to restriction of processing,
- the right to object.

Since no automated data processing takes place at the Data Controller, the right to data portability and the right to object to automated decision-making do not apply to customers.

4.1. Right to be Informed

By publishing this Notice, the Data Controller ensures that the data subject has access to all information concerning the processing of personal data, as required by Articles 13 and 14 of the GDPR. In cases where the Controller has not obtained the personal data directly from the data subject, the acquisition of the data is always mandated by Union or Member State law applicable to the Controller.

4.2. Right of Access

After verifying their identity, the data subject is entitled to receive confirmation from the Data Controller as to whether or not their personal data is being processed. The Controller shall provide the related information in writing, either by post or electronically.

4.3. Right to Rectification

The data subject may request the Data Controller to rectify any inaccurate personal data concerning them.

4.4. Right to Restriction of Processing

The data subject is entitled to request the restriction of processing if any of the following applies:

- the data subject contests the accuracy of the personal data (in such a case, the restriction applies for a period enabling the Controller to verify the accuracy of the personal data);
- the processing is unlawful, and the data subject opposes the erasure of the data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for processing purposes, but the data subject requires them for the establishment, exercise, or defence of legal claims; or
- the data subject has objected to processing (in which case, the restriction applies while it is verified whether the legitimate grounds of the Controller override those of the data subject).

4.5. Right to Object

The data subject may object to the processing of their personal data if they believe that the Data Controller is not processing their data appropriately. In such a case, the burden of proof lies with the Controller to demonstrate that the data processing is based on compelling legitimate grounds which override the interests, rights, and freedoms of the data subject, or which are necessary for the establishment, exercise, or defence of legal claims.
If the data subject objects to the processing, the Controller shall inform them of the legal basis that justifies the processing of their personal data.

5. REMEDIES

5.1. Lodging a Complaint with the Supervisory Authority

If you suffer any harm in connection with the processing of your personal data, you may file a complaint with the **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)**.

Supervisory Authority contact details:

- **Email:** ugyfelszolgalat@naih.hu
- **Phone:** +36 1 391 1400
- **Postal address:** 1363 Budapest, Pf. 9.
- **Website:** www.naih.hu

5.2. Initiating Judicial Proceedings

If your rights as a data subject are violated in the course of data processing or in relation to the exercise of your rights, you may initiate civil proceedings against the Data Controller. The case falls within the jurisdiction of a **regional court**.

The proceedings may be initiated before the court having jurisdiction at your place of residence or habitual abode. The court shall proceed with urgency.
If the violation is established, you may claim compensation for **damages and non-material harm**, and the court may order the Controller to comply with your rights as a data subject.

You can find further information and contact details of the regional courts at the following link: https://birosag.hu/torvenyszekek

5.3. Liability for Damages and Non-Material Compensation

What does liability mean in case of damage caused by the Data Controller or Data Processor?

If you suffer damage as a result of improper data processing, the **Data Controller shall be liable for compensation**. Damage is deemed to have occurred when data processing is in breach of the law or contractual obligations, and this results in a financial loss for the data subject.

In case of unlawful data processing, the data subject may also be entitled to **non-material compensation**. Such claims must primarily be enforced against the Data Controller.

The Data Processor shall only be liable if it has **breached its own obligations** or **failed to follow the lawful instructions of the Controller**. Therefore, the Processor is not liable for errors committed by the Controller.

6. DATA PROTECTION INCIDENT AND ITS MANAGEMENT

Under the GDPR, a "data protection incident" is defined as a breach of security that results in the **accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data** that has been transmitted, stored, or otherwise processed.

Accordingly, any event or situation in which your personal data may have come into the possession of unauthorized individuals qualifies as a **data protection incident**.

In the event of a data protection incident, we will report the incident to the competent supervisory authority **without undue delay and, where feasible, no later than 72 hours** after becoming aware of it.

If the data protection incident is **likely to result in a risk to the rights and freedoms of natural persons**, we will also inform you, as the data subject affected by the incident.

7. LEGISLATION APPLICABLE TO DATA PROCESSING

Legislation	Online Source
Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing	https://eur-lex.europa.eu/legal-content/HU/TXT/?uri=celex%3A32016R0679

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Directive 95/46/EC (General Data Protection Regulation – GDPR)	
Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.)	https://net.jogtar.hu/jogszabaly?docid=a1100112.tv
Act V of 2013 on the Civil Code	https://net.jogtar.hu/jogszabaly?docid=a1300005.tv
Act C of 2000 on Accounting	https://net.jogtar.hu/jogszabaly?docid=a0000100.tv