

Data Protection

DATA PROCESSING STATEMENT By accepting the Data Processing Statement issued by Easy Group Kft., i.e. by submitting orders through the websites magichotbrush.hu, magiciron.hu, magiccurly.hu, magicwind.hu, gozoloshajvasalo.hu (hereinafter referred to as “Home page”) you consent to our use of your data for the purposes of liaising, marketing and sales communication, as well as market research. The provision of data is voluntary, you have the right to ask for information on processing, or request rectification or erasure of your data at any time, in a letter sent to Easy Group Kft., H-1117 Budapest, Nádorliget u. 7/A or an email to info@magichair.hu. We take no responsibility for the veracity of data received from you.

- 1. CONTROLLER** This privacy policy and notice (hereinafter referred to as Privacy Policy) contains the data processing rules, specified in accordance with the provisions laid down in Act CXII of 2011 on Informational Self-Determination and the Freedom of Information (hereinafter referred to as Privacy Act) regarding the processing of the personal data – specified in this Privacy Policy – of the users of the websites accessible on the Homepage operated by Easy Group Kft. (H- 3128 Vizslás, Kossuth Lajos utca 73., ~~3043 Egyházasköteleg Rakoczi út 40.~~; company registration number: 12-09-008271; represented by: Fehér Csaba Managing Director, info@magichair.hu) as controller (hereinafter referred to as Controller) and of other websites accessible at other addresses specified on the Homepage (hereinafter referred to as Web Page) (hereinafter referred to as User), as well as the privacy notice provided for the Users. Name of the person responsible for processing: Csaba Fehér, email address: info@magichair.hu
- 2. GENERAL PROVISIONS** The Controller will process the User’s personal data on the basis of this Privacy Policy in accordance with the provisions laid down in the Privacy Act, in observance of the notices released by the authority in charge of data protection (currently: the National Authority for Data Protection and Freedom of Information, registered seat: H-1024 Budapest, Szilágyi Erzsébet fasor 22/C., Tel.: +36 1 391-1410, email: ugyfelszolgalat@naih.hu, and homepage: www.naih.hu) and the published judicial practice. By accepting this Privacy Policy the User consents to the Controller’s processing of data as specified in the Privacy Policy.
- 3. MODIFICATION** The Controller reserves the right to unilaterally modifying this Privacy Policy while notifying such modifications to the Users on the Web Page. The Controller will publish the modified Privacy Policy on the Web Page not later than on the fifth (5th) day preceding the effective date of the modified Privacy Policy. The User declares that by accepting this Privacy Policy they consent to liaising through the User Account or the contact details they specified during Registration or the use of the Web Page.
- 4. USERS** The User may submit their order to the Controller (for products chosen on the homepage) on the Web Page by entering their name, email address, phone number and mailing details (postal code, city and address). The User needs to accept the Data Processing Statement and the General Contract Terms and Conditions in order to be able to submit an order.
- 5. THE PURPOSE OF THE PRIVACY POLICY** The purpose of this Privacy Policy is to specify the types of personal data of the Users that are referred to in Section 8 and that are to be processed by the Controller, to ensure that the privacy of the natural person Users is respected as prescribed by the Privacy Act and other relevant and applicable pieces of legislation and that the

requirements of data protection and data security are met, as well as to prevent unauthorised access to, and alteration, unauthorised disclosure or use of, the Users' personal data.

6. **THE USER'S DECLARATION** By submitting their order the User confirms that they have read, and fully familiarised themselves with, this Privacy Policy and accept its provisions as binding on themselves and gives their voluntary, informed and unambiguous consent to the Controller's processing their personal data specified in the Privacy Policy for the purposes listed in the same, in accordance with the provisions of the Privacy Act and this Privacy Policy. By submitting their order and at the same time by accepting the Data Processing Statement and the GCTC the User consents to the Controller's processing their voluntarily provided personal data and other data for the purposes of market research, direct business acquisition, advertising newsletters, advertisements, direct marketing and telemarketing/telesales. The User may, of course, withdraw their consent at any time through any of the contact details specified in Section 1 hereof. The User declares that the data provided in the Registration process are true and correct and that they do not violate any of their other personality rights. The Controller may use alphanumeric information packages – sent by Google (as a third party) – of variable content, stored on the user's computer for a pre-determined period of validity, that is, cookies, with the Web Page. The User declares that they have familiarised themselves with the information provided by the Controller and, having done so, they consent to the Controller's use, during its data processing activity, of cookies placed by Google on their terminal equipment (device) used in accessing the Services. The User may, of course, withdraw their consent at any time by disabling the cookies.

7. **PURPOSES OF PROCESSING** Processing of the Users' personal data for the purposes of communication/liasing between the User and the Controller, for submitting orders (sale) and the required invoicing and shipping services, and the development of new services, for the protection of the Controller and the Partner, the development of individual discounts and other preferential terms and conditions, the communication of special offers, supporting the preparation and conduct of the activities started or initiated on the Web Page, supporting the Controller's activities, and for the related promotional purposes (sending newsletters, participation in giveaways, offering of products/services). The Controller may use the Users' depersonalised personal data for statistical purposes.

8. **THE PERSONAL DATA TO BE PROCESSED** The rules on the protection of Users' personal data apply exclusively to natural persons, given the fact that the term "personal data" also only makes sense in connection with natural persons, therefore this Privacy Policy applies exclusively to the processing of the personal data of natural persons. The Controller records only personal data voluntarily provided by the User during the submission of an order or during a telemarketing conversation. By providing their personal data the User consents to their personal data being entered into the Controller's database in accordance with this Privacy Policy.

8.1. The personal data processed with the aim of identifying users The Controller processes the following personal data of Users for the purpose of identification: (1) The User's natural personal identification data: first name and surname. (2) The User's email address provided when submitting the order. (3) The User's delivery address (postal code, city and address). (4) The User's direct phone number.

8.2. Data processed to enable the use of the services (1) The IP address of the User's computer, (2) Data pertaining to the User's activities involving the Web Page

8.3. Consumer complaints Data processed on a mandatory basis pursuant to Section 17/A (5) of Act CLV of 1997 on Consumer Protection (hereinafter referred to as Consumer Protection Act) for the purposes of the investigation of consumer complaints: (1) name, mailing address, phone number of the consumer, company name (2) place, time and way of the submission of the complaint; (3) detailed description of the consumer's complaint, list of the records, documents and other evidence;

(4) the company's declaration of its standpoint regarding the consumer's complaint if it can be promptly investigated; (5) the signature of the person drafting the record and the consumer, unless the complaint was communicated by phone or via some other electronic communication channel; (6) the place and date of the preparation of the record; (7) in the case of a complaint communicated by phone or via some other electronic communication channel the data suitable for the individual identification of the complaint. In the case of a complaint the User may turn to the Budapest Conciliation Board (www.bekeltet.hu, H-1016, Budapest, Krisztina Krt. 99. II. emelet 310, +36 1 488 21 31, bekelteto.testulet@bkik.hu) because the controller collaborates with that organisation.

Moreover, the User may – as specified in Article 14 of Regulation (EU) No 524/2013 – resort to the Union's online dispute resolution platform at: <https://ec.europa.eu/odr>. The service provider hereby assures the Buyer that it collaborates with the above dispute resolution platform of the EU. The controller may engage external advertising businesses (e.g. Facebook Inc., Google Inc.) for displaying its advertisements. Such companies may use certain data regarding the User's visits of this or any other websites to enable the communication of adequate advertisements (of interest to the User). If you wish to be provided with additional information on this practice and the possibility of preventing such companies' use of the information concerned, please write to any of the contact details specified in Section 1 hereof. The Controller may send notifications to the email address provided by the User, for the following purposes: - sending system messages as part of the service (e.g. home delivery information); - reminders relating to the service; - answers to requests for information, details regarding the service and products; - newsletters, marketing newsletters; - messages on confirmation and/or modification of orders; - messages on promotional offers, campaigns, discounts, and/or coupons. The Controller will, if it sends to the User any advertising or promotional email, enable the User to unsubscribe (through a link at the end of the mail) so that the User no longer receives such mails. Newsletter: the Controller operates a newsletter sending service as well on the Web Page. By submitting the order – and thus by accepting the Privacy Policy and the GCTC – the User consents to the Controller's informing it of news, discounts, campaigns and package offers relating to the products and services through newsletters. By accepting this Privacy Policy the User expressly consents to the Controller's sending them newsletters containing advertisements and offers in its own name at their contact details provided for the purpose of receiving newsletters. A User deciding at any time after the ordering of the newsletter service that may be offered on the Web Page, that they do not wish to receive any more newsletters, can unsubscribe from the service in the way specified in the newsletters and on the Web Page, or by sending an email or a letter to the Controller's contact details specified in Section 1 hereof. Own business acquisition: by accepting this Privacy Policy the User expressly consents to the Controller's processing their personal data for its own business acquisition. Such consent may be granted or withdrawn at any time during the term of the User

relationship on the Web Page or at the contact details specified in Section 1 hereof. The Controller may send information materials to the User at certain intervals in connection with its specific products and services, communicating news regarding the Products and Services. A User who does not wish to receive such letters can unsubscribe from this information service at any time in the future by sending an email regarding this intent, to the email address specified in Section 1 hereof. Sending promotional proposals, direct marketing: we may send to the Users, subject to their consent, informational circular letters concerning new products, our services and special offers at certain intervals. To this end, the Controller processes the Users' phone numbers, email addresses, names and mailing addresses and takes into account their previous purchases. In case a User no longer wishes to receive such promotional mails, despite not having notified such intent earlier, they can unsubscribe from this service at the contact details specified in Section 1 hereof and via the link to be found at the end of each newsletter. In case the User consents to the sharing of their voluntarily provided data on other websites as well, by doing so they acknowledge at the same time that such other websites are governed by their own privacy policies, in relation to which the Controller has no responsibility. Based on this consent granted by the User the Controller has the right to use the data provided as public data, for the Web Page and for promotional purposes relating to the Controller's activities and operation. The User alone shall be responsible for the personal and other data – whether their own or third persons' data – it will have voluntarily transferred specifically to the Controller, and for their transfer, and shall, in this regard, hold the Controller harmless and bear liability to settle any claim stemming from or relating to such transfers or the failure to obtain the required approvals.

9. THE LEGAL BASIS AND WAY OF PROCESSING The controller shall process the User's personal data exclusively for the purposes specified in Section 7 hereof and during the period specified in Section 10 hereof, and ensure that processing takes place, in each of its stages, in accordance with its purpose. By accepting this Privacy Policy the User declares that their consent to processing is granted and that data will subsequently be provided, in each case, on the basis of the User's voluntary, informed and unambiguous consent pursuant to Section 5(1) of the Privacy Act. Such voluntary, informed and unambiguous consent provides the legal basis for the Controller's processing as regulated by this Privacy Policy.

10. THE DURATION OF PROCESSING Data processing shall, in general, last until the end of the processing activity, and until the User's specific request for the termination of the processing activity in relation to the User. The duration of processing is five years from the date of erasure, since this is the period following the termination of the Service during which the Controller or any third person may make claims under the civil law against the User or against the Controller on account of the User's activities; this is how it is ensured that the identity of the User is retraceable and that the Controller can, if necessary, enforce against the User its claim for damages or other claim under the civil law in the case of damage or loss caused to the Controller or any third person. In compliance with its statutory obligation the Controller will retain all accounting documents underlying the accounting records directly or indirectly (including ledger accounts, analytical records and detailed registers) for a period of at least 8 years.

11. DATA SECURITY In accordance with its obligation stipulated in Section 7 of the Privacy Act the Controller shall use its best efforts to provide for the security of your data and take all necessary technical and organisational actions, and introduce procedural rules, which will be

required for the application of, and compliance with, the provisions laid down in the Privacy Act and all other relevant data and secret protection rules.

12. DATA TRANSFER, LINKING OF DATA The Controller will disclose the User's personal data to third persons, the courier service delivering the ordered products (GLS General Logistic Systems Hungary Csomag-Logisztikai Kft.). Moreover, it will transfer them to its own employees, for purposes of invoicing, packaging, sending packages, shipping and customer service. By accepting this Privacy Policy the User declares that they are aware of the fact that the data processed by the Controller will be transferred to persons commissioned by the Controller to carry out tasks of data processing, invoicing, book keeping, receivable management, delivery and customer service, as well as bodies authorised by law to resolve legal disputes. The above recipients of personal data provide the Controller with services and are operating primarily in Hungary or in other countries of the European Economic Area. Such persons use the data as instructed by the Controller and must not use the data for any other purpose. They are obliged to comply with rules on confidentiality and data protection.

PLACEMENT OF ANONYMOUS USER IDENTIFIERS (COOKIES)

13.1. Placement of own cookies The Controller uses no anonymous user identifiers (cookies) of its own on its website. It applies the Google's system for such activities.

13.2. Placement of third parties' cookies The Web Page uses the web analytics service provided by Google, Inc. (registered seat: 1600 Amphitheatre Parkway Mountain View CA 94043) (hereinafter referred to as Google) (hereinafter referred to as Google Analytics). Google Analytics also uses cookies, that is, text files placed onto your computer to facilitate the analysis of the use of the Web Page. The Controller informs the User that by accepting the Contract the User expressly consents to

Google's transferring of the information generated by the cookies regarding the use of the Web Page (including your IP address) to, and store them on, its servers in the United States of America. By using the Web Page the User consents to the transfer of their data in the way and for the purposes specified above. Google uses such information for the evaluation and analysis of the User's use of the Web Page, for preparing reports on activities on the Web Page and for providing other services relating to activities on the Web Page and to Internet use. Google is responsible for ensuring the lawfulness of the above data transfer and processing and is liable for any damage/loss and/or claim relating to them. In case you have any question regarding the above, please contact us at the email address specified in Section 1 hereof.

14. THE RIGHTS OF THE USERS, ENFORCEMENT POSSIBILITIES The User has the right to ask for information on processing and for the rectification and/or blocking of their data, and the erasure of any wrong data. Data subjects may exercise their rights relating to the processing of personal data by sending notifications to the email addresses specified in the process of submitting their Orders. A User may send their request for information or erasure by email to the email address specified in Section 1 hereof. (a) Information on the processing of their personal data the User may request information pursuant to Section 14 a) of the Privacy Act. The Controller shall provide information for the User at their request on the User's data processed by the Controller, on the purpose, legal basis and duration of processing, the name and address (registered seat) of the processor and on the activity relating to data processing, on the fact that the Controller is processing the User's data as specified in the last paragraph

of Section 7 hereof as well as its activity relating to data processing, along with who, and for what purposes, receive, or have received, the data. The information shall cover the User's rights and possible legal remedies relating to processing. A request for information on processing should be sent to the email address specified in Section 1 hereof, and it will be answered within thirty (30) working days. Such information is free of charge; if the person asking for information has not submitted a request concerning the given area in the given year to the Controller. In any other case the Controller may make the fulfilment of the request for information subject to cost compensation. Such information may be provided during the period of data processing as specified in Section 10. (b) Erasure The Controller

shall erase the personal data at the User's request with regard to subparagraph c) below. If personal data need to be retained in a legal dispute that occurred beforehand or as required by relevant statutory regulations or supervisory regulation based on relevant legal regulations, or with a view to the fulfilment of a Contract which was concluded with the User and which is still in effect, or if the data concerned contains personal data of persons other than the User inseparably and indelibly (e.g. photograph/video footage), the promptly requested erasure does not necessarily mean that the recording is made completely inaccessible, however, the recording may only be used thereafter for purposes precluding the erasure. Erasure shall be executed by the Controller free of charge. The User shall notify their request for the erasure of their personal data, by email to the Controller's email address specified in Section 1 hereof. The Controller shall erase the data concerned within thirty (30) days of receipt of the User's request based on the latter's voluntary decision. By withdrawing their consent to the processing of their personal data and by requesting the erasure of the data the User waives all of their rights to participation in the activities relating to the Registration. Erasure shall always be free of charge. The Controller shall notify the data subject of rectification or erasure, unless the omission of notification does not violate the data subject's legitimate interest. (c) Blocking The Controller will block the personal data instead of erasing them, if so requested by the User, or if on the basis of the available information the erasure might presumably violate the User's legitimate interests. The Controller will process data so blocked exclusively as long as the purpose of processing – which has precluded the erasure of the personal data – exists. (d) Flagging The Controller flags the personal data it is processing if the User contests its validity or accuracy, but the invalidity or inaccuracy of the contested personal data cannot be established beyond doubt. In case the Controller does not fulfil the User's request for rectification, blocking or erasure, it shall communicate the reasons for the rejection of the request for rectification, blocking or erasure and inform the User in writing of the possibilities of judicial remedy and turning to the data processing authority within thirty (30) days of receipt of the request.

15. RIGHT TO OBJECT AND LEGAL REMEDIES (a) Right to object The User, or anyone whose personal data has been obtained by the Controller, may object to the processing of their personal data, if - the processing (forwarding) of the personal data is required exclusively for the exercise of the right or legitimate interest of the recipient, unless processing is allowed or ordered by law; - incidentally, the exercise of the right to object is permitted by law. The Controller shall – simultaneously suspending the processing of the data – investigate the objection within a maximum of fifteen (15) days of the submission of the request, and inform the requester of its outcome. In case the objection is justified, the Controller terminates the

processing of the data and block the data. The Controller shall notify the fact of objection and the actions taken on the basis of the objection all of the recipients to whom/which it has transferred the personal data to which the objection applies, and who/which must take adequate actions to ensure the exercise of the right of objection. In case the User does not agree with the Controller's action taken on the basis of the objection or if the Controller misses the deadline for decision making, the User may seek remedy at court against the decision or against the missing of the deadline within thirty (30) days of the communication of the decision or the missed deadline. (b) Remedy The User may seek remedy on the basis of the Privacy Act and the Civil Code (hereinafter referred to as the Civil Code). In the case of any violation of their rights the User may turn to the court or the data protection authority referred to in Section 2 hereof. Anyone may request an investigation by filing a report with

the data protection authority claiming that rights have been violated in relation to the management of personal data or that there is an imminent threat of this happening. The general court having jurisdiction over the Controller's registered seat has competence regarding a legal action. The way of enforcement and the detailed statutory provisions regarding the obligations of the Controller are laid down in the Privacy Act and the Civil Code.

16. FURTHER GUARANTEES PROTECTING THE DATA SUBJECT Every User has the right - to be informed of the automated file of their personal data, its main purposes and the identity, regular address of residence or registered seat of the data file processor; - to be provided at reasonable intervals and without excessive delay or cost, with information on whether their personal data are being stored in the automated data file, and to be informed of such data in a way understandable for them.

17. THE PERSON APPOINTED BY THE CONTROLLER AS THE PERSON RESPONSIBLE FOR DATA PROTECTION Assistance for the User in making decisions relating to processing and in the exercise of the rights of data subjects will be provided by the person appointed by the Controller as data protection officer, through the email address specified in Section 1 hereof.

18. HOSTING SERVICE PROVIDER DoclerNet Hosting Kft. H-1101 Budapest, Expo tér 5-7.

info@doclernet.hu +36 1 432 3133 19. OTHER The User acknowledges, and consents to, the fact that every member of the group of which the Controller is directly or indirectly a member through an at least 50% share of ownership, or which is a buyer of all or a significant part of the assets of the Controller, shall, as regards the rights and obligations specified herein, be regarded as a beneficiary/assignee of the Controller. Such entities shall have the right to directly enforce, or invoke, any provision hereof that provide them with any benefit or right. The User shall not transfer or assign to any third person its rights and obligations under this Privacy Policy.