

Vita Group – Website Privacy Policy

Introduction

Welcome to the Vita Group 's website privacy policy.

Vita Group respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download the English and Hungarian pdf version of the policy from the website. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Vita Group collects and processes your personal data through your use of this website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Data Controller

Vita Group is made up of different legal entities, details of which can be found here: www.thevitagroup.com/contact-us. This privacy policy is issued on behalf of the Vita Group so when we

mention Vita Group, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Vita Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Vita (Holdings) Limited is the owner of and is responsible for this website.

We hereby inform you that the data controller is Vitafoam Magyarország Kft. (registered office: 7030 Paks, 8806/2. mail: info-vfh@thevitagroup.com, sales@vitahungary.hu, CEO: Mr. Stachura Tomasz Roland Managing Director, name and contact of the internal data protection contact: Ms. Monika Toth Chief Financial Officer, email: monika.toth@thevitagroup.com) with regard to data processing in Hungary.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *Your legal rights*, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Vita (Holdings) Limited, registered with Dutch Data Protection Authority under FG number FG013627

DPO is Bridget Groarke, and can be contacted by email at dataprotection@thevitagroup.com or by post addressed to Data Protection Officer, Vita Group, Oldham Road, Middleton, Manchester, M24 2DB, United Kingdom.

You have the right to make a complaint at any time to:

- (if you are located in the UK) the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or UK landline 0303 123 1113;
- (if you are located in the EU), the Lead Supervisory Authority being the Dutch Data Protection Authority / Autoriteit Persoonsgegevens, of postal address: Autoriteit Persoonsgegevens, PO Box 93374, 2509 AJ DEN HAAG, the Netherlands, and telephone number: (+31) - (0)70 - 888 85 00, fax

number: (+31) - (0)70 - 888 85 01. Website is <https://www.autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us>

- (if you are located in Hungary): the Hungarian National Authority for Data Protection and Freedom of Information, website is <https://www.naih.hu>, e-mail: ugyfelszolgalat@naih.hu, postal address: 1363 Budapest, Pf. 9., telephone number: +36 (1) 391 1400.
- (if you are located outside of UK and EU) the applicable supervisory authority in your jurisdiction

We would, however, appreciate the chance to deal with your concerns before you approach any applicable supervisory authority, so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information means any information relating to an identified or identifiable natural person ('data subject') including any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you if you provide them to us which we have grouped together as follows:

- **Identity Data** includes name,
- **Contact Data** includes email address
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect

Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy on the website.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Below are the types of lawful basis that we will rely on to process your personal data.
- Generally, we do not rely on consent as a legal basis for processing your personal data.

Purposes for which we will use your personal data

- We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal

ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Categories of personal data	Lawful basis for processing including basis of legitimate interest
To contact us	(a) Identity (b) Contact	Your consent
To apply for a job vacancy	(a) Identity (b) Contact	Your consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

Promotional offers from us and third-party marketing

We will not use your personal data for the purposes of sending marketing communications to you unless you have opted to receive such communications when buying your goods. We will not share your personal data with any third party for marketing purposes.

Cookies

What is a cookie?

A cookie is a small text file created by your browser and stored on the hard drive of your computer (if you opt-in).

The purpose of cookies on our website is to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see Cookies policy available on the website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish

to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- Internal Third Parties as set out in the *Third Parties*.
- External Third Parties as set out in the *Third Parties*.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

With effect from 1 January 2021, the UK have left the European Union and transfers of personal data within The Vita Group in the UK to other Vita Group companies within the EEA and vice versa is only carried out in accordance with the measures specified in the standard contractual clauses that is in place via data sharing agreements, as set out in the EUROPEAN COMMISSION IMPLEMENTING DECISION on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers_en.

Apart from the UK, we do not transfer your personal data outside the European Economic Area (EEA).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to

know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Based on the Hungarian legislation,

- we take care of the denial of access to the devices used for data management (hereinafter: data management system) by unauthorized persons
- we take care to prevent unauthorized reading, copying, modification or removal of data media,
- we take care to prevent the unauthorized entry of personal data into the data management system and the unauthorized access, modification or deletion of the personal data stored in it,
- we take care to prevent the use of data management systems by unauthorized persons via data transmission equipment,
- we ensure that persons authorized to use the data management system have access only to the personal data specified in the access permit,
- we ensure that it is possible to verify and establish to which recipients personal data have been or may be transmitted or made available by means of data transmission equipment.
- we make sure that it is possible to check and determine afterwards which personal data were entered into the data management system, at what time.
- we take care to prevent the unauthorized disclosure, copying, modification or deletion of personal data during their transmission or during the transport of the data carrier.
- we ensure that the data management system can be restored in the event of a breakdown.
- we ensure that the data management system is functional.
- we ensure that errors are reported during the operation of the data management system.
- we ensure that stored personal data cannot be altered even if the system is malfunctioning.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. In the event of a complaint, the data must be kept for 5 years..

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal

data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By the Hungarian law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for eight years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if you re-apply for the same set of data in the current year, or if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month, moreover, according to the Hungarian legal provisions, the answer will be given within 25 days. Occasionally it could take us longer than 25 days, or a

month if your request is particularly complex or you have made a number of requests. In this case, we will notify you before the deadline and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers who provide IT and system administration services including:
 - MÁŠ GR '99 Bt. (Fáy András u. 7., H-7100 Szekszárd, info@pixelfaragok.hu) which operates the server which hosts our website and captures and stores cookies on our behalf; and
- Professional advisers including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Prior information, which means that we are obliged to inform you of the details of the data processing without your request.

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove

your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Issued on: 11 November 2020.

Revised on: 7 April 2021 with post-Brexit updates.

- Data Protection Officer details updated
- EU Representative details updated
- Lead supervisory authority details updated
- Paragraph 6 post-Brexit Standard Contractual Clauses for international UK-EU transfers

Revised on: 16 August 2021 with post-Brexit updates:

- ICO and Lead supervisory authority contact details added

Revised on: 22 February, 2023

END.