

PRIVACY POLICY

IN RELATION TO THE WEBSITES OF THE DR. LENKEI HEALTH CULTURE GROUP OF COMPANIES, THE SERVICES PROVIDED BY IT AND PRODUCT SALES

Valid from: 16-09-2022

1. INTRODUCTION, JOINT CONTROLLERSHIP

1.1 JOINT DATA PROCESSING PERFORMED BY THE DR. LENKEI HEALTH CULTURE GROUP OF COMPANIES

The companies and persons belonging to the **Dr. Lenkei Health Culture Group of companies** coordinate their activities related to the websites, webshops operated by them and the products sold and services provided by them, and perform them uniformly within the Group of Companies.

Within the framework of this, they jointly determine the data processing goals and tools related to the marketing activities of the Group of Companies, the organization and execution of marketing campaigns, the sending of direct marketing messages and materials, online marketing, customer service activities and communication, in respect of which they act as a joint data controller under the joint data controllership contract concluded by and between them on November 29, 2018 with respect to the personal data processed in connection with these activities (hereinafter the joint data controllers are collectively referred to as: **the Service Provider**).

The member companies of Dr. Lenkei Health Culture Group of Companies acting as joint data controllers and their contact details are the following:

Vitamin Zászlóshajó Kft.

Corporate registration number: 01-09-900822

Head office: 1085 Budapest, József körút 8. 3. em. 5.

Tax number: 14368666-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Egészséget Mindenkinek Nonprofit Kft.

Corporate registration number: 01-09-913340

Head office: 1085 Budapest, József körút 8. 3. em. 3.

Tax number: 14645848-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Dr. Lenkei Vitamin Kft.

Corporate registration number: 01-09-371477

Head office: 1085 Budapest, József körút 8. 3. em. 3.

Tax number: 28732334-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Vitamininvest Kft.

Corporate registration number: 01-09-923506

Head office: 1085 Budapest, József körút 8. 3. em. 2.

Tax number: 14863226-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Vitaminfutár Kft.

Corporate registration number: 01-09-900817

Head office: 1085 Budapest, József körút 8. 3. em. 3.

Tax number: 14368587-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Dr. Lenkei Admin Kft.

Corporate registration number: 01-09-340457

Head office: 1085 Budapest, József körút 8. 3. em. 2.

Tax number: 26709077-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Dr. Lenkei Clean Food Kft.

Corporate registration number: 01-09-358301

Head office: 1085 Budapest, József körút 8. 3. em. 2.

Tax number: 27943854-2-42

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Dr. Lenkei s.r.o.

Head office: 929 01, Veľké Dvorníky, Nový rad 145., Slovakia;

EU VAT number: SK2022612900

Corporate registration number: 44160245

Represented by: Dr. Gábor Béla Lenkei, Managing Director

MVP s.r.o.

Head office: SK-93101 Šamorín, Krivá 10. A. ép. Slovakia;

EU VAT number: SK2022615342

Corporate registration number: 44160143

Represented by: Dr. Gábor Béla Lenkei, Managing Director

Vitamin Expert Online Kft.

Corporate registration number: 10-09-037895

Head office: 3323 Szarvaskő, Iskola utca 8.

Tax number: 27943854-2-42

Represented by: Balázs Deli, Managing Director

Dr. Gábor Béla Lenkei

Address: 1085 Budapest, József körút 8. 3. em. 3.

The substantive provisions of the above-mentioned joint data controllership contract concluded by the members of Dr. Lenkei Health Culture are the following:

- Vitamin Zászlóshajó Kft. operates the Dr. Lenkei Vitamin webshop, accessible at www.drlenkei.hu and www.drlenkei.com, and the webshop accessible at www.cenzurazottegeszseg.hu, and Vitamin Zászlóshajó Kft. performs data processing related to the purchases made in the webshops

and to the visits to the websites of the webshops, furthermore, in this regard, it also informs the data subjects of the data processing operations carried out there. Vitamin Zászlóshajó Kft. also concludes contracts with the companies that perform the home delivery of products ordered in the webshops.

- Vitamin Expert Online Kft. operates the Dr. Lenkei webshop in Slovakia accessible at www.drlenkei.com/sk and Vitamin Expert Online Kft. performs data processing related to the purchases made in the webshop and to the visits to the website of the webshop, furthermore, in this regard, it also informs the data subjects of the data processing operations carried out there. Vitamin Expert Online Kft. also concludes contracts with the companies that perform the home delivery of products ordered in the www.drlenkei.com/sk webshop. Vitamin Expert Online Kft. performs customer services activities in connection with the website of www.drlenkei.com/sk both in person, by e-mail and by telephone, and it performs data processing during the customer services activities and, in this regard, it informs the data subjects of the data processing operations carried out there.
- Dr. Lenkei Clean Food Kft. operates the Dr. Lenkei Clean Food webshop accessible at www.drlenkeicleanfood.hu and Dr. Lenkei Clean Food Kft. performs data processing related to the purchases made in the webshop and to the visits to the website of the webshop, furthermore, in this regard, it also informs the data subjects of the data processing operations carried out there. Dr. Lenkei Clean Food Kft. also concludes contracts with the companies that perform the home delivery of products ordered in the www.drlenkeicleanfood.hu webshop. Dr. Lenkei Clean Food Kft. performs customer services activities in connection with the website of www.drlenkeicleanfood.hu both in person, by e-mail and by telephone, and it performs data processing during the customer services activities and, in this regard, it informs the data subjects of the data processing operations carried out there.
- Dr. Gábor Béla Lenkei operates the website accessible at www.drlenkei.org, and in this regard, he also informs the data subjects of the data processing operations carried out there.
- Vitamin Zászlóshajó Kft. operates the websites www.uzleteink.hu, www.drlenkeiajandek.hu and www.drlenkeivitamin.hu, it performs data processing on these websites and, in this regard, it also informs the data subjects of the data processing operations carried out there.
- Vitamin Zászlóshajó Kft. performs customer services activities in connection with all websites, webshops operated by itself and the Dr. Lenkei specialty stores, both in person, by e-mail and by telephone, and it performs data processing during the customer services activities and, in this regard, it informs the data subjects of the data processing operations carried out there. Within the framework of its customer services activities,

Vitamin Zászlóshajó Kft. processes instances of data subjects exercising their rights and requests received by any member of the Dr. Lenkei Health Culture Group of Companies, and Vitamin Zászlóshajó Kft. responds to such inquiries.

- Dr. Lenkei Vitamin Kft. operates the Dr. Lenkei Health Culture specialty stores, it carries out the data processing related to purchases made in the specialty stores and it informs the data subjects of the data processing operations carried out there.
- Vitaminfutár Kft. performs marketing activities for all members of the Dr. Lenkei Health Culture Group of Companies, in the framework of which Vitaminfutár Kft. sends out all electronic direct marketing messages of the Group of Companies, it performs the tasks related to online marketing for the Group of Companies, in the scope of which it enters into contracts with online marketing service providers and newsletter sending service providers.
- Vitaminvest Kft. performs the tasks related to paper-based offline marketing activities, job is to send the printed marketing materials to the stakeholders, it enters into contracts with the printing office in connection with this tasks. Vitaminvest Kft. operates the website www.drlenkeipartner.hu, it performs data processing on these websites and, in this regard, it also informs the data subjects of the data processing operations carried out there.
- Dr. Lenkei s.r.o. provides hosting services for the specific websites and enters into a contract with these service providers. At the same time, it operates the website www.drlenkeichannel.com, performs data processing on this website and, in this regard, it informs the data subjects about the data processing carried out there.
- Dr. Lenkei Admin Kft. performs accounting and bookkeeping tasks.
- Az Egészséget Mindenkinék Nonprofit Kft. performs information connected to the new health culture either in electronic or printed form.

1.2. JOINT DATA PROCESSING RELATED TO THE LOYALTY PROGRAM, NEWSLETTER AND DIRECT MARKETING MESSAGE SENDING, AND EXPERIENCE GATHERING

The Dr. Lenkei Health Culture Group of Companies (hereinafter referred to as: the Service Provider), together with the operators of its contracted Dr. Lenkei specialty stores and the Product Distributors, defines the data processing goals and tools in connection with the loyalty program related to Dr. Lenkei's products and services, the data processing goals and tools related to the sending of newsletters and direct marketing messages, furthermore, the data processing goals and tools related to the collection of experience with the offered products. And, in respect of this data processing, the operators of the above indicated members of Dr. Lenkei Health Culture, furthermore, the contracted Dr. Lenkei specialty stores and the Product Distributors are considered

joint data controllers and, with regard to the personal data processed in connection with these activities, they act as joint data controllers pursuant to the joint data controllership contract concluded by and between them on June 2, 2019.

The list of the Dr. Lenkei contracted specialty stores and Product Distributors (hereinafter referred to as: **the Contractual Partners**) is included in Annex no. 1.

With regard to the substantive provisions of the above-mentioned joint data controllership contract, the joint data controllers inform the data subjects of the following:

- The operators of contracted specialty stores and the members of Dr. Lenkei Health Culture also collect applications for the loyalty program, both on paper and online. The contracted stores and all members of Dr. Lenkei Health Culture have access to the loyalty program database, can enter records to it and retrieve data from it. The provision of data processing information related to the loyalty program is carried out by Vitamin Zászlóshajó Kft. on the online interfaces.
- The operators of the contracted specialty stores and the members of Dr. Lenkei Health Culture also gather experiences from customers about the effects of the sold products. The contracted stores collect experiences on a paper basis, while online experience collection is carried out by Vitamin Zászlóshajó Kft. on the websites www.drlenkei.hu, www.drlenkei.com, www.drlenkeivitamin.hu operated by it, and Vitamin Expert Online Kft collect experiences on the website www.drlenkei.com/sk operated by itself. Dr. Lenkei Clean Food Kft. collects experiences online on the website www.drlenkeicleanfood.hu operated by it and on paper basis. Vitamin Zászlóshajó Kft. and Dr. Lenkei Clean Food Kft. inform the data subjects about the data processing related to the experiences on their own websites and the data management information sheet is also available on paper in all stores where the experience can be described on paper.
- The members of the Dr. Lenkei Health Culture Group of Companies use the experience gained about the effects of Dr. Lenkei products in their joint marketing activities and process the personal data contained in this experience.

The members of the Dr. Lenkei Health Culture Group of Companies, as well as the above-mentioned Contractual Partners in connection with the loyalty program and experience gathering inform the Users in the following about the data processing taking place on the Website and during the services provided through it by the Service Provider in accordance with Regulation no. 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter referred to as: the **GDPR**).

2. DEFINITIONS

Service provider: The companies and persons listed above and belonging to the Dr. Lenkei Health Culture Group of Companies, who operate the Website.

Website: All content and services available under the domain www.drlenkei.hu, www.drlenkei.com, www.drlenkeicleanfood.hu, www.drlenkei.org; www.uzleteink.hu; www.drlenkeivitamin.hu; www.drlenkeiajandek.hu; www.drlenkeipartner.hu; www.cenzurazottegeszseg.hu; www.drlenkeichannel.com and all the country-specific subdomains of these main domains.

User: A person who visits the Website or any of them.

Loyal Customer Policy: The general terms and conditions published on the Website, which contain the conditions for participation in the Loyal Customer Program.

3. WHAT IS THE PURPOSE OF THIS DATA PROCESSING NOTICE?

In this data processing notice the Service Provider and the Contractual Partners provide the Users with detailed information on the processing of personal data on the Website and during their loyalty program in accordance with the law.

In respect of the data processing implemented on the Website, the Service Provider qualifies as a joint data controller.

4. WHAT IS THE PURPOSE OF THE WEBSITE?

The www.drlenkei.hu Website is the Hungarian webshop of Dr. Lenkei preparations, the Service Provider fulfills orders in Hungary from here. In addition to purchasing in the webshop, the Users can also subscribe to the loyalty program, request newsletters, send a message to the Service Provider via the contact and messaging form, and share their experience with Dr. Lenkei preparations with the Service Provider.

The www.drlenkei.com Website is the European webshop of Dr. Lenkei preparations, the Service Provider fulfills European orders from here. It has country-specific subdomains (e.g. www.drlenkei.com/nl and www.drlenkei.com/sk) where customers are able to order only to the given country. In addition to purchasing in the webshop, the Users can also subscribe to the loyalty program, request newsletters, send a message to the Service Provider via the contact and messaging form, and share their experience with Dr. Lenkei preparations with the Service Provider.

The www.drlenkeicleanfood.hu Website is the Hungarian webshop of products marketed by Dr. Lenkei Clean Food Kft., the Service Provider fulfills orders in Hungary from here. In addition to purchasing in the webshop, the Users can also subscribe to the loyalty program, request newsletters, send a message to the Service Provider via the contact and messaging form.

The www.cenzurazottegeszseg.hu Website is the Hungarian webshop of the book of Dr. Gábor Lenkei titled Censored Health, Service Provider fulfills orders in Hungary from here.

The www.drlenkei.org Website is a website presenting the work and results of Dr. Gábor Béla Lenkei, through which Users can subscribe to Dr. Gábor Lenkei's friendly society, thus obtaining the opportunity to read Dr. Gábor Lenkei's books free of charge or request a newsletter.

The www.drlenkeichannel.com Website is a website presenting the educational lectures of Dr. Gábor Béla Lenkei, on which the Users may become subscribers for communication purposes and thus receive information about the new lectures appearing on the Website and about the events organized by Dr. Lenkei Health Culture.

On the www.uzleteink.hu Website, Users can find out where the Dr. Lenkei Health Culture Specialty Stores and retail partners are located in Hungary.

On the Websites www.drlenkeivitamin.hu; www.drlenkeiajandek.hu, data related to various promotions are shared, and it is also possible to give consent to marketing inquiries periodically.

On the Website www.drlenkeipartner.hu, Users can find out how and under what conditions a company can become a Dr. Lenkei Health Culture Product Distributor in Hungary.

5. HOW DOES THE DATA PROCESSING NOTICE APPLY TO THE USER?

By accessing the Website, using the services available on the Website, and using the functions of the Website, the Users automatically acknowledge the contents of this data processing notice without making any further legal notices.

6. WHO CAN AMEND THE DATA PROCESSING NOTICE, HOW CAN IT BE AMENDED, AND WHERE AND HOW DOES THE SERVICE PROVIDER PUBLISH IT?

The Service Provider is authorized to unilaterally amend this data processing notice at any time. The Service Provider publishes the amendments to the data processing notice by publishing the data processing notice consolidated with the amendments on the Website. The Users are asked to read the data processing notice carefully each time they visit the Website.

This data processing notice is continuously available on the Website. Users may open this data processing notice on the Website, view it, print it out, save it, but may not amend it, only the Service Provider is authorized to do so.

This data processing notice is also available in printed form in the Dr. Lenkei specialty stores operated by the Contractual Partners, as well as in the Service Provider's own Dr. Lenkei specialty stores.

7. WHAT PERSONAL INFORMATION DO WE PROCESS, FOR HOW LONG, WHAT DO WE USE IT FOR, AND UNDER WHAT AUTHORITY?

The legal bases for our data processing are the following:

- a) according to point (a) of Article 6 (1) of the GDPR, the voluntary informed consent of the user to the data processing (hereinafter referred to as: the **Consent**);
- b) according to point (b) of Article 6 (1) of the GDPR, the data processing is necessary for the performance of a contract in which the User as the data subject is one of the parties (hereinafter referred to as: the **Performance of the contract**)
- c) according to point (c) of Article 6 (1) of the GDPR, the data processing is necessary for the fulfillment of a legal obligation applicable to the data controller (such as: the fulfillment of accounting or bookkeeping obligation – hereinafter referred to as: **Compliance with legal obligations**)
- d) according to point (f) of Article 6 (1) of the GDPR, the data processing is necessary to protect the legitimate interests of the data controller or of a third party (hereinafter referred to as: the **Legitimate interest**)
- e) data processing permit provided by Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (hereinafter referred to as: the Elkertv.), according to which the Users' natural person identification data (name, birth name, mother's birth name, place and date of birth) and residential address can be processed without the User's consent for the purposes of concluding a contract for the provision of an information society service, defining its content, amending it, monitoring its fulfillment, invoicing the resulting fees and enforcing the related claims, moreover, it is possible to process the User's natural person identification data and residential address without the User's consent, together with the data on the date, duration and location of the use of the service for the purpose of invoicing the fees resulting from the contract for the provision of the information society service (hereinafter referred to as: **Article 13/A of the Elkertv.**).

7.1. DATA PROCESSING RELATED TO THE WEBSITE, THE LOYAL CUSTOMER SYSTEM AND PAPER-BASED DATA PROCESSING

7.1.1. Data processing related to those who fill in the retailer application form

The User can register as a retailer for the Dr. Lenkei Health Culture Group of Companies on the website www.drlenkeipartner.hu by filling in the retailer application form. The source of the data is always the person applying to become a retailer. In connection with this, the Service Provider processes the following information about the User:

Processed data category	Purpose of data processing	The legal basis of data processing	Duration of data storage
Name	a) Sending of an offer b) Identification c) Communication	Point (f) of Article 6(1) of the GDPR: Legitimate interest	If the offer is not accepted: 1 year from the request for an offer
e-mail address	a) Sending of an offer b) Communication	Point (f) of Article 6(1) of the GDPR: Legitimate interest	If the offer is not accepted: 1 year from the request for an offer
Name and address of the shop	a) Sending of an offer b) Identification c) Communication	Point (f) of Article 6(1) of the GDPR: Legitimate interest	If the offer is not accepted: 1 year from the request for an offer
Telephone number	a) Sending of an offer b) Communication	Point (f) of Article 6(1) of the GDPR: Legitimate interest	If the offer is not accepted: 1 year from the request for an offer
Personal information	a) Sending of an offer b) Communication	Point (f) of Article 6(1) of the GDPR: Legitimate interest	If the offer is not accepted: 1 year from the request for an offer

Specification of the legitimate interest:

- a) **Communication, identification:** the business interest of the Service Provider and the potential retailer requesting an offer from it is to communicate with each other in connection with the request for an offer. The purpose of data processing cannot be achieved in any other way, communication cannot be achieved without contact information.
- b) **Making an offer:** it is in the legitimate interest of the Service Provider and the potential retailer to make the offer, to expand the business and contractual relations of the Service Provider, and to improve its economic performance.

Data subjects may object separately to the processing of data based on the above legitimate interest, in which case the Data Controller may no longer process their data, unless it proves that the processing is justified by overriding legitimate reasons which take precedence over the data subject's interests, rights and freedoms, or relating to the filing, enforcement or defense of legal claims.

7.1.2. Data processing related to those who fill in the contact form

The User may contact the Service Provider by providing his / her contact details on the Website, he / she may send a message to it by e-mail by filling in and submitting the contact form available on the Website. The members of the Dr. Lenkei Health Culture Group of Companies, as joint data controllers, process the following data about the User in connection with this:

A	B	C	D	E
Category of data processed	Data source:	Adatkezelés célja	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	Data subject	a) Contact, answering questions b) Identification	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
E-mail address	Data subject	c) Contact, answering questions d) Identification	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
Data contained in the message	Data subject	e) Contact, answering questions a) Identification	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn

Users may withdraw their consent to data processing at any time and request the Service Provider to delete their data in an e-mail sent to the Service Provider's e-mail address specified below.

7.1.3. Data processing related to those submitting experience with products sold

Users can submit what experience they have had with the use of marketed products and what changes they have noticed on the Website, and on paper in the Dr. Lenkei specialty stores and Dr. Lenkei Clean Food specialty stores. Submitters of experience are free to choose whether or not to allow their experience to be shared, disclosed, communicated. If they allow such use, they are free to decide whether to permit the sharing of their experiences with indication of their initials or names.

With regard to the personal data provided here of the persons submitting the experience the members of the Dr. Lenkei Health Culture Group of Companies defined in the above section 1.1, furthermore, the Contractual Partners defined in section 1.2 are considered as Joint Data Controllers, they jointly define

the purpose and means of data processing related to the submitted experience. The Contractual Partners take part in the collection of experiences, while the Dr. Lenkei Health Culture Group of Companies uses and displays the experiences.

The Service Provider does not process special data, especially health data, so it draws the Users' attention to the fact that they should not provide information qualifying as such special health data on the datasheet, or nor share information indicating illness, health condition or harmful addiction.

Given that the legal basis for data processing in this case is the consent of the person providing the experience, therefore only one's own experience can be submitted, and the provision of any information about another person is forbidden. All persons submitting experience must provide real information when completing the form.

A	B	C	D	E
Category of data processed	Data source	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	Data subject	Identification Contact Creation of statistics Development of products and services Publishing for marketing purposes on a website, in publications	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
Consumed preparations	Data subject	Creation of statistics Development of products and services Publishing for marketing purposes on a website, in publications	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
Described experience, changes	Data subject	Creation of statistics Development of products and services Publishing for marketing purposes on a website, in publications	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
Customer ID	Data subject	Identification Creation of statistics Development of products and services	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn

Users may withdraw their consent to data processing at any time and request the Service Provider to delete their data in an e-mail sent to the Service Provider’s e-mail address specified below.

7.1.4. Data processing for communication purposes i.e. sending Newsletters and direct marketing messages

The Service Provider sends marketing messages by e-mail or SMS to the persons who have consented to it for business marketing purposes, which contain information, discounts, promotions, prize competitions and their detailed conditions, as well as other marketing messages related to the Service Provider’s products and services. In addition, the Service Provider sends paper-based marketing materials, product catalogs, magazines and other marketing materials by post. The Service Provider also informs the subscribers about the important Dr. Lenkei Health Culture events and new developments.

With regard to data related to the sending of direct marketing messages and materials, the members of the Dr. Lenkei Health Culture Group of Companies indicated in the above section 1.1 of this data processing notice, furthermore, the Contractual Partners defined in the above section 1.2 are regarded as joint data controllers, whereas they jointly define the purpose and means of data processing for marketing purposes, and they share the data processing and other tasks and responsibilities related to marketing according to the above sections 1.1 and 1.2 and based on the joint data controllership contract concluded by and between them, between each other, according to which, within the Group of Companies, Vitaminfutár Kft. carries out the marketing activities for all members of the Dr. Lenkei Health Culture Group of Companies, within the framework of which Vitaminfutár Kft. sends out all electronic direct marketing messages of the Group of Companies, it performs tasks related to online marketing for the Group of Companies, under which it enters into contracts with online marketing service providers and newsletter sending service providers.

The Service Provider processes the following data of the recipients for the purpose of sending direct marketing messages and newsletters:

A	B	C	D	E
Category of data processed	Data source	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	From the data subject	Sending of electronic and postal direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
E-mail address	From the data subject	Sending of electronic and postal direct marketing messages for marketing purposes, by direct inquiry,	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn

		offering and containing offers, advertisements, discounts, promotions and other benefits		
Residential address (in the case of postal marketing)	From the data subject	Sending of electronic and postal direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
Telephone number (in the case of SMS newsletter)	From the data subject	Sending of electronic and postal direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn

Users may withdraw their consent to data processing at any time and request the Service Provider to delete their data in an e-mail sent to the Service Provider's e-mail address specified below.

Newsletter recipients can unsubscribe from the newsletter or direct marketing message by clicking the unsubscribe or similarly named link at the end of each newsletter or electronic direct market message, or by sending a letter to the Service Provider's e-mail address or postal address below, thereby revoking their consent to data processing.

Recipients can unsubscribe from a direct marketing message sent via SMS by sending a reply SMS.

In the case of unsubscribing, your e-mail address, SMS number, address and name will be deleted from our newsletter database and we will no longer send newsletters or direct marketing messages to that address.

If you unsubscribe, you can re-subscribe to our newsletter at any time. Subscribing to the newsletter is not a condition for using any of our other services. An e-mail address and name are required to subscribe to the e-newsletter, without which it is not possible to subscribe. The newsletter subscription may be a condition for participating in a promotion or prize competition, this condition is always included in the specific rules of the given promotion or prize competition.

The newsletter and direct marketing message do not include messages related to the price, terms or changes of the service or product purchased. The Service Provider notifies the contracted customers of the change of the contract conditions within the framework of communication, contact and

notification related to the performance of the contract via the contact details of the contractual partners, including by e-mail. Detailed information on this data processing case is provided in the separate data processing notice attached to the contracts concluded with the contracted partners.

7.2. DATA PROCESSING RELATED TO THE LOYALTY PROGRAM

There is no loyalty customer program in the Dr. Lenkei Clean Food specialty stores and webshop, as well as in the webshop in www.cenzurazottegeszseg.hu.

The Dr. Lenkei Health Culture Group of Companies and the Contractual Partners jointly operate a loyalty program as defined in the Loyal Customer Policy in the Dr. Lenkei Vitamin specialty stores. With regard to the personal data processed in the loyalty program, the members of the Dr. Lenkei Health Culture Group of Companies specified in the above section 1.1., furthermore, the Contractual Partners specified in section 1.2. are considered to be joint data controllers. The Contractual Partners and members of Dr. Lenkei Health Culture also collect loyal customer applications both on paper and online. All members of the Contractual Partners and the Dr. Lenkei Health Culture Group of Companies have access to the loyal customer database, can make entries in it and retrieve data from it. The provision of data processing information related to the loyalty program is carried out by Vitamin Zászlóshajó Kft. on the online interfaces.

The above joint data controllers process the following data in connection with the Loyalty Program:

A	B	C	D	E
Category of data processed	Data source	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of loyalty registration
E-mail address	The natural person concerned	a) Identification b) Communication c) Provision of discounts	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of loyalty registration

		d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits		
Telephone number	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of loyalty registration
Birth year	The natural person concerned	Creation of statistics	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of loyalty registration
Sex	The natural person concerned	Creation of statistics	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of loyalty registration
Customer ID	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of loyalty registration

Users may withdraw their consent to data processing at any time and request the Service Provider to delete their data in an e-mail sent to the Service Provider's e-mail address specified below.

7.3. DATA PROCESSING RELATED TO REGISTRATION ON THE WEBSITE WWW.DRLENKEI.ORG

Dr. Gábor Lenkei made his books available for free to applicants for membership in the Dr. Gábor Lenkei friendly society on www.drlenkei.org. By registering on the website, members of the friendly society can read the books for free. The books can be freely purchased by non-registrants at Dr. Lenkei Health Culture specialty stores, retailers and the webshop.

Dr. Gábor Lenkei processes the following data in connection with the members applying for membership in the Dr. Gábor Lenkei friendly society:

A	B	C	D	E
Category of data processed	Data source	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of registration at the website
E-mail address	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of registration at the website
Telephone number	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of registration at the website

Postal address	The natural person concerned	a) Identification b) Communication c) Provision of discounts d) Sending of electronic and other direct marketing messages for marketing purposes, by direct inquiry, offering and containing offers, advertisements, discounts, promotions and other benefits	Point (a) of Article 6(1) of the GDPR: Consent	Until the termination of registration at the website
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Users may withdraw their consent to data processing at any time and request the Service Provider to delete their data in an e-mail sent to the Service Provider's e-mail address specified below.

7.4. DATA PROCESSING RELATED TO PURCHASES IN THE WWW.DRLENKEI.HU, WWW.DRLENKEI.COM, WEBSITE WWW.WWW.CENZURAZOTTEGESZSEG.HU, WWW.DRLENKEICLEANFOOD.HU WEBSHOPS

Users can buy or order products online either without registration or with registration on the www.drlenkei.hu, www.drlenkei.com and www.cenzurazottegeszseg.hu websites.

The operator of the webshops is Vitamin Zászlóshajó Kft., the contact details of which can be found in section 1.1 of this data processing notice, and it is considered data controller with regard to the personal data of the natural persons purchasing in the webshop.

Users can buy or order products online either without registration or with registration on the www.drlenkeicleanfood.hu website.

The operator of the webshop at www.drlenkeicleanfood.hu is Dr. Lenkei Clean Food Kft., the contact details of which can be found in section 1.1 of this data processing notice, and it is considered data controller with regard to the personal data of the natural persons purchasing in the webshop.

Users can buy or order products online either without registration or with registration on the www.drlenkei.com/sk website.

The operator of the webshop at www.drlenkei.com/sk is Vitamin Online Expert Kft., the contact details of which can be found in section 1.1 of this data processing notice, and it is considered data controller with regard to the personal data of the natural persons purchasing in the webshop.

Vitamin Zászlóshajó Kft. processes the following data on natural person customers in connection with the purchases and orders made on the websites www.drLenkei.hu, www.drLenkei.com and www.cenzurazottegeszseg.hu, so does the Vitamin Expert Online Kft. on the website www.drLenkei.com/sk and the Dr. Lenkei Clean Food Kft. does on the website www.drLenkeiCleanFood.hu:

The source of all data is the customer concerned.

A Category of data processed	B Purpose of data processing	D The legal basis of data processing	E Duration of data storage, date and time of deletion
Name	a) Contract conclusion, b) Performance of the contract c) Enforcement of claims and rights d) Identification e) Communication f) Invoicing	In the case of a purpose according to B/a), b), d) and e): point (b) of Article 6(1) of the GDPR: Contract conclusion and performance In the case of a purpose according to B/a), b), d) and e): point (b) of Article 6(1) of the GDPR: Contract conclusion and performance In the case of a purpose according to B/f): point (c) of Article 6(1) of the GDPR: fulfillment of a legal obligation: in the case of data necessary for fulfillment of a tax payment obligation, Article 78(3), Article 202(1) of Act CL of 2017 on the system of taxation (hereinafter referred to as: the "Art."); and in the case of documents necessary for the fulfillment of an accounting obligation, Articles 168-169 of Act C of 2000 on accounting (hereinafter referred to as: the "Sztv.").	in the case of documents necessary for the fulfillment of a tax payment obligation: for 5 years from the last day of the calendar year in which the tax return, data declaration or declaration should have been made; or, in the absence of a tax return, data declaration or declaration, the tax should have been paid; and in the case of documents required for the fulfillment of the accounting obligation: for 8 years from the date of termination of the contract. In other cases, the data must be kept for 5 years after the termination of the given legal relationship
E-mail address	a) Contract conclusion b) Performance of the contract	In the case of a purpose according to B/a), b), d) and e): point (b) of Article 6(1) of the GDPR:	in the case of documents necessary for the fulfillment of a tax payment obligation: for 5

	<p>c) Enforcement of claims and rights d) Identification e) Communication</p>	<p>Contract conclusion and performance</p> <p>In the case of a purpose according to B/c): point (f) of Article 6(1) of the GDPR: Legitimate interest</p>	<p>years from the last day of the calendar year in which the tax return, data declaration or declaration should have been made; or, in the absence of a tax return, data declaration or declaration, the tax should have been paid; and in the case of documents required for the fulfillment of the accounting obligation: for 8 years from the date of termination of the contract. In other cases, the data must be kept for 5 years after the termination of the given legal relationship</p>
Telephone number	<p>a) Contract conclusion b) Performance of the contract c) Enforcement of claims and rights d) Identification e) Communication</p>	<p>In the case of a purpose according to B/a), b), d) and e): point (b) of Article 6(1) of the GDPR: Contract conclusion and performance</p> <p>In the case of a purpose according to B/c): point (f) of Article 6(1) of the GDPR: Legitimate interest</p>	<p>in the case of documents necessary for the fulfillment of a tax payment obligation: for 5 years from the last day of the calendar year in which the tax return, data declaration or declaration should have been made; or, in the absence of a tax return, data declaration or declaration, the tax should have been paid; and in the case of documents required for the fulfillment of the accounting obligation: for 8 years from the date of termination of the contract. In other cases, the data must be kept for 5 years after the termination of the given legal relationship</p>
Delivery address	<p>a) Contract conclusion b) Performance of the contract c) Enforcement of claims and rights d) Identification e) Communication</p>	<p>In the case of a purpose according to B/a), b), d) and e): point (b) of Article 6(1) of the GDPR: Contract conclusion and performance</p> <p>In the case of a purpose according to B/c): point (f) of Article 6(1) of the GDPR: Legitimate interest</p>	<p>in the case of documents necessary for the fulfillment of a tax payment obligation: for 5 years from the last day of the calendar year in which the tax return, data declaration or declaration should have been made; or, in the absence of a tax return, data declaration or</p>

		interest	declaration, the tax should have been paid; and in the case of documents required for the fulfillment of the accounting obligation: for 8 years from the date of termination of the contract. In other cases, the data must be kept for 5 years after the termination of the given legal relationship
Invoicing address	<ul style="list-style-type: none"> a) Contract conclusion b) Performance of the contract c) Enforcement of claims and rights d) Identification e) Communication f) Invoicing 	<p>In the case of a purpose according to B/a), b), d) and e): point (b) of Article 6(1) of the GDPR: Contract conclusion and performance</p> <p>In the case of a purpose according to B/c): point (f) of Article 6(1) of the GDPR: Legitimate interest</p> <p>In the case of a purpose according to B/f): point (c) of Article 6(1) of the GDPR: fulfillment of a legal obligation: in the case of data necessary for fulfillment of a tax payment obligation, Article 78(3), Article 202(1) of Act CL of 2017 on the system of taxation (hereinafter referred to as: the "Art."); and in the case of documents necessary for the fulfillment of an accounting obligation, Articles 168-169 of Act C of 2000 on accounting (hereinafter referred to as: the „Sztv.”).</p>	<p>in the case of documents necessary for the fulfillment of a tax payment obligation: for 5 years from the last day of the calendar year in which the tax return, data declaration or declaration should have been made; or, in the absence of a tax return, data declaration or declaration, the tax should have been paid; and in the case of documents required for the fulfillment of the accounting obligation: for 8 years from the date of termination of the contract. In other cases, the data must be kept for 5 years after the termination of the given legal relationship</p>

Specification of the legitimate interest of the Service Provider:

a) **Data processed for claim and right enforcement purposes:** In the case of purchases made in the webshops www.drLenkei.hu, www.drLenkei.com, www.cenzurazottegeszseg.hu and www.drLenkeiCleanFood.hu Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. use the data of the customer in order to settle legal disputes arising from existing contracts, or in order to provide evidence in possible litigation, non-contentious or other official proceedings. These data are processed by Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. so that if a legal dispute arises with the buyer in connection with the contract, Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. can use these data for evidence purposes. Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. may exercise this right within the limitation period. Data processing is therefore necessary in order to protect the rights and legitimate interests of Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. The purpose of data processing cannot be achieved otherwise.

b) **Communication and identification data required for the establishment and performance of the contract:** Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. communicate with the customer in connection with the customer's contract (i.e., his or her purchase in the webshop), confirm the order with a message sent to the given e-mail address, contact the customer at the given telephone number in the case of problems, questions, or in connection with delivery, therefore it is necessary to process the contact data of the customer. It is in the common interest of Vitamin Zászlóshajó Kft., Vitamin Expert Online Kft. and Dr. Lenkei Clean Food Kft. and the customer contracted with it to communicate in connection with the contract and the webshop purchase. The purpose of data processing cannot be achieved in any other way, communication cannot be achieved without contact information.

The data subjects may object to the above data processing based on a legitimate interest by sending an e-mail to the e-mail address of Vitamin Zászlóshajó Kft. specified below.

7.5. DATA PROCESSING RELATED TO PERSONS APPEARING ON THE WEBSITES, MARKETING MATERIALS AND INFORMATION VIDEOS

The companies belonging to the Dr. Lenkei Health Culture Group of Companies and specified in the above section 1.1., acting as joint data controllers within the framework of their joint marketing activities, take photos and use them in their online and offline marketing materials. The members of Dr. Lenkei Health Culture Group of Companies, acting as joint data controllers, process the following data in this respect:

A	B	D	E
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Category of data processed	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Portrait (photo, video)	Use in newsletters, online and printed publications, on the Service Provider's website, on social media pages for marketing purposes, for the promotion of the data controller and its products and services, for the preparation of reports and news	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
		<p>In the case of recordings of the data subject's activities involving public appearance and mass recordings, the consent of the data subject is not required for the production and use of the recordings (Article 2:48 of the Civil Code). In this case, the legal basis for preparing and using the recordings is point (f) of Article 6(1) of the GDPR (data processing is necessary to enforce the legitimate interests of the Service Provider).</p> <p>The legitimate interest: preparation and use of the recordings in order to strengthen the business appearance of the Service Provider and to improve the work atmosphere.</p>	Until the right to object is exercised

The Service Provider draws attention to the fact that, in the case of displaying a portrait or photo in a printed publication, it is not possible to cancel, revoke, recall the already printed publication from circulation, request its return from the recipients or otherwise delete the photo from the publication. The data subject consents to the taking and use of the photo being aware of this limitation.

Third parties may make backups and / or copies of publicly available recordings, which the Service Provider cannot verify.
The recordings published on the Service Provider's Intranet can be viewed by all employees of the Service Provider.

Materials appearing on the Service Provider's LinkedIn page or on other Internet interfaces or other media interfaces are public.

The data subject is free to withdraw their consent at any time by noting the above limitations by sending a message to the contact details of the Service Provider specified below.

The data subject may object to the data processing based on a legitimate interest at any time, in which case the data controller may not continue to process the personal data, except where the data controller demonstrates compelling legitimate grounds for the data processing which override the interests, rights, and freedoms of the data subject, or are needed for the establishment, exercise or defense of legal claims.

7.6. DATA PROCESSING RELATED TO PHOTO AND VIDEO RECORDING AT EVENTS

The companies belonging to the Dr. Lenkei Health Culture Group of Companies and specified in the above section 1.1., acting as joint data controllers within the framework of their joint marketing activities, take photos of the participants at the events organized by them and use these photos in their online and offline marketing materials. The members of Dr. Lenkei Health Culture Group of Companies, acting as joint data controllers, handle the following data in this respect:

A	B	D	E
Category of data processed	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Portrait (photo, video)	Use in newsletters, online and printed publications, on the Service Provider's website, on social media pages for marketing purposes, for the promotion of the data controller and its products and services, for the preparation of reports and news	Point (a) of Article 6(1) of the GDPR: Consent	Until consent is withdrawn
		<p>In the case of recordings of the data subject's activities involving public appearance and mass recordings, the consent of the data subject is not required for the production and use of the recordings (Article 2:48 of the Civil Code). In this case, the legal basis for preparing and using the recordings is point (f) of Article 6(1) of the GDPR (data processing is necessary to enforce the legitimate interests of the Service Provider).</p> <p>The legitimate interest: preparation and use of the recordings in order to strengthen the business appearance of the Service Provider and to improve the work atmosphere.</p>	Until the right to object is exercised

The Service Provider draws attention to the fact that, in the case of displaying a portrait or photo in a printed publication, it is not possible to cancel, revoke, recall the already printed publication from circulation, request its return from the recipients or otherwise delete the photo from the publication. The data subject consents to the taking and use of the photo being aware of this limitation.

Third parties may make backups and / or copies of publicly available recordings, which the Service Provider cannot verify.

The recordings published on the Service Provider's Intranet can be viewed by all employees of the Service Provider.

Materials appearing on the Service Provider's LinkedIn page or on other Internet interfaces or other media interfaces are public.

The data subject is free to withdraw their consent at any time in acknowledgment of the above limitations by sending a message to the Service Provider via any of the channels specified below.

The data subject may object to the data processing based on a legitimate interest at any time, in which case the data controller may not continue to process the personal data, except where the data controller demonstrates compelling legitimate grounds for the data processing which override the interests, rights, and freedoms of the data subject, or are needed for the establishment, exercise or defense of legal claims.

7.7. CUSTOMER SERVICE COMMUNICATION-RELATED DATA PROCESSING

The specialty stores and webshops (except the Slovakian) of the companies belonging to the Dr. Lenkei Health Culture Group of Companies specified in the above section 1.1 operate joint customer services, in the framework of which they process the personal data provided by the Users in connection with customer services requests as a joint data controller. Under the joint data controllership contract, Vitamin Zászlóshajó Kft. performs customer service activities for the benefit and on behalf of the member companies of Dr. Lenkei Health Culture related to all websites, webshops and own Dr. Lenkei specialty stores, both personally and by e-mail or by phone, and it carries out data processing taking place during the customer services activities and it also informs the data subjects about the data processing carried out there.

The Vitamin Expert Online Kft. belonging to the Dr. Lenkei Health Culture Group of Companies specified in the above section 1.1 operate customer services in the Slovakian webshop, in the framework of which it processes the personal data provided by the Users in connection with customer services requests as a data controller. Vitamin Online Expert Kft. performs customer service activities for the benefit related to the Slovakian webshop both personally and by e-mail or by phone, and it carries out data processing taking place during the customer services activities and it also informs the data subjects about the data processing carried out there.

The Dr. Lenkei Clean Food Kft. belonging to the Dr. Lenkei Health Culture Group of Companies specified in the above section 1.1 operate customer services in the www.drlenmeicleanfood.hu webshop, in the framework of which it processes the personal data provided by the Users in connection with customer services requests as a data controller. Dr. Lenkei Clean Food Kft. performs customer service activities for the benefit related to the Dr. Lenkei Clean Food webshop both personally and by e-mail or by phone, and it carries out data processing taking place during the customer services activities and it also informs the data subjects about the data processing carried out there.

Within the framework of its customer services activities, Vitamin Zászlóshajó Kft. processes instances of data subjects exercising their rights and requests received by any member of the Dr. Lenkei Health Culture Group of Companies, and Vitamin Zászlóshajó Kft. responds to such inquiries.

As a joint data controller, the Service Provider processes the following data in connection with customer services:

A	B	D	E
Category of data processed	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	a) Communication b) Identification c) Answering a question, customer service administration d) Enforcement of claims and rights	Point (f) of Article 6(1) of the GDPR: Legitimate interest	for 5 years
Residential address	a) Communication b) Identification c) Answering a question, customer service administration d) Enforcement of claims and rights	Point (f) of Article 6(1) of the GDPR: Legitimate interest	for 5 years
E-mail address	a) Communication b) Identification c) Answering a question, customer service administration d) Enforcement of claims and rights	Point (f) of Article 6(1) of the GDPR: Legitimate interest	for 5 years
Telephone number	a) Communication b) Identification c) Answering a question, customer service administration d) Enforcement of claims and rights	Point (f) of Article 6(1) of the GDPR: Legitimate interest	for 5 years

The data subject may object to the data processing based on a legitimate interest at any time, in which case the data controller may not continue to process the personal data, except where the data controller demonstrates compelling legitimate grounds for the data processing which override the interests, rights, and freedoms of the data subject, or are needed for the establishment, exercise or defense of legal claims.

Specification of the legitimate interest:

a) **Enforcement of claims and rights:** The Service Provider uses the above customer services data in order to settle legal disputes related to Dr. Lenkei Preparations, webshops, the Website, and to provide evidence in any litigation, non-contentious or other official proceedings. These data are processed by the Service Provider so that if a legal dispute arises with the person calling the customer services, the Service Provider can use these data for evidence purposes. The Service Provider may exercise this right within the limitation period. Data processing is therefore necessary in order to protect the rights and legitimate interests of the Service Provider. The purpose of data processing cannot be achieved otherwise.

b) **Communication, identification in order to answer the question and to facilitate customer services administration:** it is necessary for the customer services administration that the person contacting customer services is first identified so that his or her question, complaint or case can be identified and investigated. The Service Provider is not always able to respond satisfactorily to anonymous inquiries. In order to answer the customer's request, to settle his or her complaint and to communicate with him or her, to provide information, it is necessary to process the contact details of the person requesting customer services, which is in the common legitimate interest of both the Service Provider and the data subject. The purpose of data processing cannot be achieved otherwise.

7.8. DATA PROCESSED DURING THE AUTOMATIC DATA COLLECTION RELATED TO ALL WEBSITES

The companies belonging to the Dr. Lenkei Health Culture Group of Companies and specified in the above section 1.1 jointly perform the online marketing tasks related to the Websites, and jointly determine the purpose and tools of the data processing taking place during the online marketing tasks related to the Websites.

With regard to data automatically collected on the Websites, the members of the Dr. Lenkei Health Culture Group of Companies indicated in the above section 1.1 of this data processing notice are considered as joint data controllers. Based on the joint data controllership contract concluded by and between them, within the Group of Companies, Vitaminfutár Kft. performs the marketing activities for all members of the Dr. Lenkei Health Culture Group of Companies, in the framework of which Vitaminfutár Kft. performs the tasks related to online marketing for the Group of Companies, under which it enters into contracts with online marketing service providers.

We use cookies and other various programs on the Website in order to get to know the needs of the Website Users, their behavior in relation to the Website and to further develop the Website based on these, and to compile anonymous statistics on Website visits. Certain small programs help Users not to have to re-enter their credentials the next time they log in and make it easier and faster to authenticate them, while other programs are used to authenticate Users.

The Service Provider classifies the cookies used by the Service Provider into three main groups:

a) **Cookies absolutely necessary for the operation of the Website:** without these, the Websites will not work at all or will not function as intended, these cookies are required to run the Websites. Such cookies only apply to operations such as language, currency, login, and privacy preferences. If these cookies are blocked by the User in his / her browser, the Websites will not work properly.

The Service Provider processes the cookies that are absolutely necessary for the operation of the Websites on the basis of a legitimate interest in accordance with point (f) of Article 6(1) of the GDPR.

In the case of data processing based on a legitimate interest, the data subject may object to the data processing at any time, in which case his / her data will no longer be processed by the Service Provider.

b) **Cookies for analytical and statistical purposes:** these cookies allow the Service Provider to measure visitor traffic and process data in databases. They also help the Service Provider understand which products and activities are more popular than others. These cookies can be blocked by the User in his or her browser or he or she can also use this: <https://tools.google.com/dlpage/gaoptout>. The Service Provider uses the data collected by these cookies for the optimization of the Website, and for the further development of the Website and its services.

The Service Provider processes these cookies on the basis of the consent pursuant to point (a) of Article 6(1) of the GDPR.

In the case of consent-based data processing, the data subject may withdraw his or her consent in the browser settings at any time, in which case the Service Provider will not use the given cookie and will no longer perform data collection or data processing with it.

c) **Cookies for marketing and remarketing purposes:** these cookies are usually set for marketing, advertising and promotional activities in order to monitor the scope of interests of the Users and then to be able to display relevant ads on the Website accordingly. If the User does not enable these cookies, he or she will not receive targeted ads in the future. The purpose of processing the data collected using these cookies is to segment for direct business acquisition

purposes in order to publish targeted advertisements. In addition, in order for Users to receive only those advertisements that are relevant to their interests and that are relevant to them, we use the automatically collected data to segment Users and advertisement recipients into groups.

We do not make decisions based on automatically collected data, we do not link them to the data we process about the data subjects in our activities, we do not use them in other contexts, and we do not make automated decisions based on them. The above data processing has no legal effect on the data subjects.

The Service Provider processes these cookies on the basis of the consent pursuant to point (a) of Article 6(1) of the GDPR.

In the case of consent-based data processing, the data subject may withdraw his or her consent in the browser settings at any time, in which case the Service Provider will not use the given cookie and will no longer perform data collection or data processing with it.

General provisions for cookies

Generally, a cookie is a small file made up of letters and numbers that is sent to a User's device from our server. The cookie enables the recognition of when the User last logged in to the Website; the main purpose of the cookie is to allow the User to make personalized offers and advertisements available to the User, which personalize the User experience using the Website. and express the personal needs of the User.

Trusted partners help the Service Provider to display advertisements on and off the Website, and analytics providers, such as Google Analytics may also place cookies on the User's device.

The Service Provider uses the following third-party cookies for the following purposes:

Name of the cookie	Purpose of the cookie
Google Analytics	Generation of traffic statistics, further development of the website
Google Adwords Remarketing	Use of advertising services provided by Google LLC, display of targeted, segmented advertising

We use Google Analytics services and cookies on the Websites, as follows:

Google Analytics is an Internet analytics service of Google LLC. (hereinafter referred to as: “Google”) that helps the Service Provider learn more about the habits of visitors to the Websites. Google Analytics summarizes information about website usage, such as the IP address, which can be sent to Google and stored on servers. We use this information to generate reports and improve the operation of our website. Cookies also collect anonymous information about the following: the number of visitors to the Website and information about which page visitors come to the Websites from and which pages of the Websites they view.

Learn more about Google Analytics cookies here: <http://www.google.com/policies/privacy/>

To turn off Google Analytics tracking when you visit the Websites, please click on the link below: <http://tools.google.com/dlpage/gaoptout>

On our Websites, the User can give his or her consent to cookies in groups according to their type.

We do not make decisions based on automatically collected data, we do not link them to other data otherwise processed in the course of our activities, we do not use them in other contexts, and we do not make automated decisions based on them. The above data processing has no legal effect on the data subjects.

The User may set his or her browser to accept all cookies, reject them all, or notify the user when a cookie arrives on the user’s computer. Each browser is different, so the “Help” menu can help you change your cookie settings. For more information on the nature of cookies and how to turn them off, see <http://www.youronlinechoices.com/hu/>.

In order for the Service Provider to become aware that the User has blocked the use of certain cookies, the Service Provider places a blocking cookie on the user’s device, so the Service Provider will know that it cannot place cookies the next time the User visits the Website.

For the most commonly used browsers, the menu items for handling cookies are:

- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>
- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Microsoft Edge: <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

Google Analytics offers additional options for unsubscribing from Google Analytics services: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

Cookies used per website:

7.8.1. On the websites www.drlenkei.hu, www.drlenkei.com, www.cenzurazottegeszseg.hu and www.drlenkeicleanfood.hu:

Cookies absolutely necessary for the operation of the Website: there are no such cookies on the Websites.

Cookies for statistical and analytical purposes:

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_ga	<p>Purpose: User identification and tracking on the Website by storing the so called Client ID, generating anonymous traffic statistics. It collects data for Google Analytics about the user's device, browsing habits and dwelling place.</p> <p>Scope of data collected: anonymized data, dwelling place, operating system, time spent on the website, subpages visited within the website.</p>	2 years from the setup / update	Google Analytics
_gid	<p>Purpose: to distinguish and group users.</p> <p>Scope of data collected: anonymized data, dwelling place, operating system, time spent on the website, subpages</p>	24 hours after setup / update	Google Analytics

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
	visited within the website.		

Cookies for marketing and remarketing purposes: there are no cookies for this purpose on the Websites.

7.8.2. On the websites www.drlenkeichannel.com and www.drlenkei.org:

Cookies absolutely necessary for the operation of the Website: there are no such cookies on the Websites.

Cookies for statistical and analytical purposes:

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_utma	Purpose: User identification and tracking on the Website by storing the so called Client ID, generating anonymous traffic statistics. It collects data for Google Analytics about the user's device, browsing habits and dwelling place. This cookie provides information about whether or not you have previously visited the Website. This allows us to determine	2 years from the setup / update	Google Analytics

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
	<p>more precisely who the new visitors to the Websites are.</p> <p>Scope of data collected: number of page visits, date of the first and last visit.</p>		
_utmb	<p>Purpose: Together with the _utmc cookie, the average length of time spent on the Websites can be determined with this cookie.</p> <p>The scope of data collected: date of access to the website</p>	It is automatically deleted when you close the browser.	Google Analytics
_utmc	<p>Purpose: Together with the _utmb cookie, the average duration spent on the Websites can be determined with this cookie.</p> <p>The scope of data collected: the time of leaving the website Together with the _utmb cookie, it shows the time when the browser was closed.</p>	30 minutes from setup / update	Google Analytics
_utmt	Used to control the fetch rate	10 minutes	Google Analytics

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_utmz	<p>Purpose: This cookie tracks the location from where the visitor clicked over to the Websites (e.g., from another website or search engine).</p> <p>The scope of data collected: website visit source page, search term, country of origin, language settings, computer, device and browser technical settings.</p>	6 months from setup / update	Google Analytics

Cookies for marketing and remarketing purposes: there are no cookies for this purpose on the Websites.

7.8.3. On the website www.uzleteink.hu:

Cookies absolutely necessary for the operation of the Website: there are no such cookies on the Websites.

Cookies for statistical and analytical purposes:

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_utma	<p>Purpose: User identification and tracking on the Website by storing the so called Client ID, generating anonymous traffic statistics. It collects data for Google Analytics about the user's device, browsing habits and dwelling place. This cookie provides information about whether or not you have previously visited the Website. This allows us to determine more precisely who the new visitors to the Websites are.</p> <p>Scope of data collected: number of page visits, date of the first and last visit.</p>	2 years from the setup / update	Google Analytics
_utmb	<p>Purpose: Together with the _utmc cookie, the average length of time spent on the Websites can be determined with this cookie.</p> <p>The scope of data collected: date of access to the website</p>	It is automatically deleted when you close the browser.	Google Analytics
_utmc	<p>Purpose: Together with the _utmb cookie, the average duration spent on the Websites can be determined with this cookie.</p> <p>The scope of data collected: the time of leaving the website Together with the _utmb cookie, it shows the time when the</p>	30 minutes from setup / update	Google Analytics

COOKIE NAME	PURPOSE OF THE COOKIE AND THE SCOPE OF DATA COLLECTED	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
	browser was closed.		
_utmt	Used to control the fetch rate	10 minutes	Google Analytics
_utmz	<p>Purpose: This cookie tracks the location from where the visitor clicked over to the Websites (e.g., from another website or search engine).</p> <p>The scope of data collected: website visit source page, search term, country of origin, language settings, computer, device and browser technical settings.</p>	6 months from setup / update	Google Analytics

Cookies for marketing and remarketing purposes: there are no cookies for this purpose on the Websites.

7.9. DATA PROCESSING RELATED TO THOSE WHO FILL IN THE PRODUCT ORDER

Users can place orders for out-of-stock natural cosmetics at Dr. Lenkei Health Culture Specialty Stores. Upon arrival of the ordered cosmetics, the employees of the Specialty Store will notify the ordering user by phone or SMS. The members of the Dr. Lenkei Health Culture Group of Companies, as joint data controllers, process the following data about the User in connection with this:

A	B	C	D	E
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Category of data processed	Data source:	Purpose of data processing	The legal basis of data processing	Duration of data storage, date and time of deletion
Name	Data subject	a) Communication b) Identification	Point (a) of Article 6(1) of the GDPR: Consent	Until the order is fulfilled or the consent is withdrawn
Telephone number	Data subject	a) Contact and communication b) Identification	Point (a) of Article 6(1) of the GDPR: Consent	Until the order is fulfilled or the consent is withdrawn

Users may withdraw their consent to data processing at any time and request the Service Provider to delete their data in an e-mail sent to the Service Provider's e-mail address specified below.

7.10. DATA PROCESSING RELATED TO THE ENFORCEMENT OF THE DATA PROTECTION RIGHTS OF THE DATA SUBJECTS (FOR DETAILS PLEASE ALSO SEE SECTION 12)

The Service Provider also performs data processing when the data subjects exercise their data protection rights in connection with the Service Provider's data processing. The Service Provider performs the following data processing in this case:

Designation and purpose of data processing	The legal basis of data processing	The scope of personal data processed	Duration of data processing	Who can access personal data within the Service Provider's organization?
Data processing related to the enforcement of data protection rights of the data subjects (for details please see also section 10)	Point (c) of Article 6(1) of the GDPR (data processing is necessary to fulfill the legal obligation of the Service Provider as a data controller). The legal obligation: enabling the exercise	Personal data related to data protection requests received by the Service Provider: in the case of natural persons / legal entities or other organizations contacting the Service Provider, the contact details of the contact persons (especially: name, address, e-mail address, telephone number), the content of the request and steps taken in	Data retention period: indefinite unless otherwise specified by the data protection authority.	The employees involved in responding to the request or the question, as well as the representative of the Service Provider.

	of data subjects' rights under Article 15-22 of the GDPR, and the documentation of other steps taken in response to the request.	connection with the request and documents prepared in connection with the request. For example, if the data subject requests the deletion of all his or her data in accordance with the GDPR by e-mail, and the Service Provider does so, the e-mail requesting the deletion itself will be retained.		
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7.11. DATA PROCESSING IN ORDER TO ARCHIVE THE CONSENTS OF THE DATA SUBJECTS TO THE DATA PROCESSING AND THE POSSIBLE WITHDRAWAL OF THE CONSENT STATEMENT

On the basis of statutory requirements, the Service Provider is obliged to register the consents, in connection with which it performs the following data processing:

Designation and purpose of data processing	The legal basis of data processing	The scope of personal data processed	Duration of data processing	Who can access personal data within the Service Provider's organization?
Archiving of data subjects' consents to data processing and possible withdrawal of the consent statement	Point (c) of Article 6(1) of the GDPR (data processing is necessary to fulfill the legal obligation of the Service Provider as a data controller). The legal obligation: according to Article 7(1) of the GDPR, if	If any data processing of the Service Provider was based on the consent of the data subject, the Service Provider also archives the given consent. The purpose of this is to ensure that the lawfulness of the consent can be verified at any time. If the data	Data retention period: indefinite unless otherwise specified by the data protection authority.	The employees involved in the handling of the consent or the withdrawal of the consent, as well as the representative of the Service Provider.

	the processing is based on consent, the data controller must be able to prove that the data subject has consented to the processing of their personal data.	subject withdraws his or her consent, the Service Provider will also keep the withdrawal statement (and the related communication). The purpose of this is to ensure that the Service Provider always knows whether a specific data subject has withdrawn his or her consent to a specific data processing.		
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7. 12. DATA PROCESSING FOR RECORDING DATA PROTECTION INCIDENTS (INCLUDING THE DOCUMENTATION OF THE STEPS TAKEN IN CONNECTION WITH HANDLING THE INCIDENT)

On the basis of statutory requirements, the Service Provider registers the information related to the data protection incident, during which it performs the following data processing:

Designation and purpose of data processing	The legal basis of data processing	The scope of personal data processed	Duration of data processing	Who can access personal data within the Service Provider's organization?
Records of data protection incidents (including also the documentation of steps taken to deal	Point (c) of Article 6(1) of the GDPR (data processing is necessary to fulfill the legal obligation of the Service Provider as a data controller).	Personal data of the data subjects related to the data protection incident.	Data retention period: indefinite unless otherwise specified by the data protection authority.	The employees involved in the handling of the data protection incident, as well as the representative of the

with incidents)	The legal obligation: Pursuant to Article 33(5) of the GDPR, the data controller must keep records of data protection incidents, indicating the facts related to the data protection incident, its effects and the measures taken to remedy it. These records allow for the data protection authority to verify compliance with the requirements of the GDPR.			Service Provider
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8. INCIDENTS THE CONTACT PERSON OF THE MEMBERS OF THE DR. LENKEI HEALTH CULTURE GROUP OF COMPANIES, AS JOINT DATA CONTROLLERS

In accordance with the joint data controllership contract, the companies belonging to the Dr. Lenkei Health Culture Group of Companies, as joint data controllers appoint a separate contact person, through whose contact details the data subjects can exercise their rights related to data processing and submit their requests and inquiries. Data subjects may also send their legal statement to withdraw their consent to this postal address and e-mail address.

The designated contact person for the Dr. Lenkei Health Culture joint data controllers is:

Vitamin Zászlóshajó Kft.

Head office: 1085 Budapest, József körút 8. 3. em. 5.

Postal address: 1085 Budapest, József körút 8. 3. em. 5.

Telephone number: +36205553181, +36202396168

E-mail: adatvedelem@drlenkei.hu

9. PROCESSORS

We employ various enterprises with whom we have concluded a data processing contract to process and store your data. The following processors process your data:

Name and contact details of the data processor	Character of data processing	The scope of persons involved in data processing	The scope of data involved in data processing
Gábor Viktor Szilasi, self-employed sole trader Head office: 1083 Budapest, Práter u. 60. 13. em. 145.; tax number: 68354897-1-42	Accounting data recording, receipt document control, accountancy, recording	Natural person customers	Invoicing information: name, residential address, purchased product, price
Dalma Jakubisz Vida, self-employed sole trader Head office: 1039 Budapest, Hollós Korvin Lajos u. 15. fsz. 2.; tax number: 68354897-1-42	Accounting data recording, receipt document control, accountancy, recording	Natural person customers	Invoicing information: name, residential address, purchased product, price
Imex Global Kft. Cg.01-09-972476; head office: 1188 Budapest, Nagykőrösi út 23.; tax number: 23583317-2-43; represented by: Gyula Nagy, Executive	Business management software, business management system support	Natural person customers	Invoicing information: name, residential address, purchased product, price
ITL Audit Hungary Kft. Head office: 1056 Budapest, Váci utca 81. 4. emelet; tax number: 22978473-2-41; represented by: Dóra Szeles	Auditor	Natural person customers	Invoicing information: name, residential address, purchased product, price
BDM Rendszerház Kft.	Financial, accounting,	Natural person	Invoicing information: name, residential

Cg. 01-09-694487; head office: 1139 Budapest, Forgách utca 19. 1. em. 101/A.; tax number: 12603284-2-41; represented by: Viktória Fazekas-Musitz, József Tolnai, Executive	asset management software	customers	address, purchased product, price
Express One Hungary Kft. Cg. 01-09-980899; head office: 1239 Budapest, Európa u. 12.; tax number: 13947109-2-43; represented by: Pesztericz Péter, Executive	Courier service	Natural person customers	Name Telephone number Delivery address Product purchased Paid price
SPRINTER Futárszolgálat Kft. Cg. 01-09-660447; head office: 1097 Budapest, Táblás u. 39.; tax number: 12263840-2-43; represented by: Rita Radics and László Zsetnyai, Executives	Courier service	Natural person customers	Name Telephone number Delivery address Product purchased Paid price
GLS General Logistics Systems Hungary Kft. Cg. 13-09-111755; head office: 2351 Alsónémedi, GLS Európa u. 2.; tax number: 12369410-2-44; represented by: Back, Rico Ralph Hermann, Executive	Courier service	Natural person customers	Name Telephone number Delivery address Product purchased Paid price
AD DESIGN SOLUTIONS Kft. Cg. 09-09-019566; head office: 4025 Debrecen, Simonffy utca 4-6. fszt. 41.; tax number: 22918077-2-09; represented by: Anita Takács, Executive	Online marketing services, website operation	Website visitors	Data collected automatically from the website visitors

Google LLC 1600 Amphitheatre Pkwy Mountain View, California 94043, USA	Google analytics	Website visitors	Data collected automatically from the website visitors
Microsoft Corporation One Microsoft Way Redmond, Washington 98052	Microsoft Office 365 felhőszolgáltatás	Persons in documents stored in the Microsoft 365 system	All data stored in the Microsoft 365 system
The Rocket Science Group LLC d/b/a MailChimp Georgia 675 Ponce De Leon Ave NE, Suite 5000 Atlanta, Georgia 30308	MailChimp hírlevél küldő rendszer	Newsletter recipients	Name E-mail address

10. INFORMATION ON DATA TRANSMISSION TO FOREIGN COUNTRIES:

From among the data processors used, the USA-based **Google, LLC.** (1600 Amphitheatre Pkwy Mountain View, California 94043; USA), **Microsoft Corporation** (One Microsoft Way Redmond, Washington 98052) and **The Rocket Science Group LLC d/b/a MailChimp** (Georgia, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA), for data transfers outside EEA member states, the new Standard Contractual Clauses adopted by the European Commission on June 4, 2021 are applied, which thus comply with Article 46 (2) and (3) of the GDPR and provide adequate guarantees for data transfer, i.e., the data transmission here does not constitute a transmission to a third country outside the European Union and it does not require the specific consent of the data subjects, and the data transmission there is permitted under Article 46 of the GDPR.

11. WHO IS THE DATA PROTECTION OFFICER OF THE SERVICE PROVIDER AND WHAT ARE THEIR CONTACT DETAILS?

The Service Provider is not obliged to appoint a data protection officer.

12. WHAT ARE YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA AND HOW DO WE ENSURE THAT THEY ARE EXERCISED?

12. 1. DATA PROTECTION RIGHTS AND LEGAL REMEDIES

The data protection rights and opportunities for legal remedy of data subjects are set out in detail in the relevant provisions of the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82). The following summary contains the most important provisions and the Joint Data Controllers will accordingly provide information to data subjects on their rights and opportunities for legal remedy in relation to data processing.

The information must be provided in writing or otherwise, including, where applicable, by electronic means. At the request of the data subject, oral information may also be provided that the identity of the data subject has been otherwise proven.

On behalf of the Joint Data Controllers, Vitamin Zászlóshajó Kft. must, without undue delay, but in any event within one month following the receipt of the data subject's request related to the exercising of their rights (see also: Articles 15-22 of the GDPR), inform the data subject about the measures taken upon their request. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by an additional two months. The data subject will be notified of any extension of the deadline by the Service Provider within one month after the request is received, indicating the reason for the delay. If the data subject submitted the request electronically, the requested information must be made available in electronic format, unless the data subject expressly requested otherwise.

If the Joint Data Controllers do not take action upon the data subject's request, on behalf of the Joint Data Controllers, Vitaminfutár Kft. will inform the data subject without delay, but at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

12.2. RIGHT OF ACCESS FOR THE DATA SUBJECT

(1) The data subject is authorized to receive feedback from the Joint Data Controllers as to whether or not the processing of their personal data is in progress. If such data processing is in progress, the data subject is entitled to obtain access to the personal data and the following information:

- a) the purposes of data processing;
- b) the categories of the personal data concerned;
- c) the recipients or categories of recipients to whom or which the personal data were disclosed or will be disclosed by the Service Provider, including, in particular, third country recipients and international organizations;

- d) where appropriate, the planned duration of the storage of personal data, or if this is not possible, the aspects for determining this period;
- e) the right of the data subject to request the Service Provider to rectify, delete or restrict the processing of personal data, and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority; and
- g) if the data have not been collected from the data subject, all the available information on their source.

(2) If personal data are transmitted to a third country, the data subject is entitled to be informed of the appropriate guarantees regarding the transmission.

(3) Copies of the personal data constituting the subject matter of data processing are to be made available by the Joint Data Controllers to the data subject. For additional copies requested by the data subject, the Joint Data Controllers may charge a reasonable fee based on the administrative costs. If the data subject submitted the request electronically, the requested information must be made available in a widely used electronic format, unless the data subject expressly requested otherwise.

12.3. THE RIGHT TO RECTIFICATION

The data subject is entitled, upon his or her request, to have inaccurate personal data concerning him or her rectified by the Joint Data Controllers without undue delay. The data subject is also authorized to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary declaration.

12.4. RIGHT OF ERASURE (“RIGHT TO BE FORGOTTEN”)

(1) The data subject is entitled, at his or her request, to have personal data concerning him or her deleted by the Joint Data Controllers without undue delay if one of the following reasons exists:

- a) personal data are no longer required for the purpose for which they were collected or otherwise processed by the Service Provider;
- b) the data subject withdraws the consent on which the data processing is based, and there is no other legal ground for the data processing;
- c) the data subject objects to the data processing and, where applicable, there is no overriding legitimate reason for the data processing;
- d) the personal data have been unlawfully processed;
- e) the personal data must be deleted in order to fulfill a legal obligation under Union or Member State law applicable to the Service Provider; or
- f) the personal data have been collected in connection with the provision of information society services.

(2) Where the Joint Data Controllers have disclosed personal data and are required to delete it in accordance with the above, they must take reasonable steps, including also the technical measures, to inform the data controllers, taking into account the available technology and the cost of implementation, that the data subject has requested the deletion of the links to the personal data in question or of a copy or duplicate of those personal data.

(3) Paragraphs 1 and 2 are not applicable where data processing is necessary, inter alia:

- a) for exercising the right of freedom of expression and information;
- b) for the purpose of fulfilling the obligation under EU or Member State law applicable to the Service Provider requiring the processing of personal data;
- c) for the purposes of archiving in the public interest, for scientific and historical research purposes or for statistics purposes, where the right referred to in Paragraph 1 would be likely to make such processing impossible or seriously jeopardize it; or
- d) to file, assert or defend legal claims.

12.5. THE RIGHT TO RESTRICT DATA PROCESSING

(1) The data subject is entitled to have the data processing restricted by the Joint Data Controllers upon his or her request, if one of the following applies:

- a) the data subject disputes the accuracy of the personal data, in which case the restriction applies to the period of time that allows the Service Provider to check the accuracy of the personal data;
- b) the data processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Joint Data Controllers no longer need the personal data for the purpose of data processing, but the data subject requests this data in order to make, enforce or protect legal claims; or
- d) the data subject has objected to the data processing; in that case, the restriction applies until it is established whether or not the legitimate grounds of the Joint Data Controllers take precedence over the legitimate grounds of the data subject.

(2) Where data processing has been restricted under Paragraph 1, with the exception of storage, such personal data will only be processed with the consent of the data subject or for the establishment, exercising or defense of legal claims or for the protection of the rights of another natural person or legal entity or for reasons of important public interest of the Union or of a Member State.

(3) The Joint Data Controllers inform the data subject at whose request the data processing was restricted on the basis of the above of the lifting of the restriction on data processing.

12.6. NOTIFICATION OBLIGATION RELATED TO THE CORRECTION OR DELETION OF PERSONAL DATA OR THE RESTRICTION OF DATA PROCESSING

The Joint Data Controllers must inform each recipient of any rectification, erasure or restriction of data processing whom or which the personal data was disclosed to, unless this proves impossible or involves a disproportionate effort. At the request of the data subject, the Joint Data Controllers must inform him or her of these recipients.

12.7. THE RIGHT TO DATA PORTABILITY

(1) The data subject is entitled to receive the personal data concerning him or her, which he or she has provided to the Joint Data Controllers, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the Joint Data Controllers to which the personal data have been provided, where:

- a) data processing is based on consent or contract; and
- b) data processing takes place by automated means.

(2) In exercising his or her right to data portability under Paragraph 1, the data subject is entitled to have the personal data transmitted directly from one data controller (thus, the Joint Data Controllers and other data controllers) to another, where technically feasible.

(3) The exercising of the right described above must be without prejudice to the provisions relating to the right of erasure (“right to be forgotten”) and may not adversely affect the rights and freedoms of others.

12.8. THE RIGHT TO OBJECT

(1) On grounds relating to his / her particular situation the data subject has the right to object at any time to the processing of his / her personal data on the basis of a legitimate interest. In this case, the personal data may not be processed any longer by the Joint Data Controllers, unless it is demonstrated that the data processing is justified by overriding legitimate reasons which take precedence over the interests, rights and freedoms of the data subject or which relate to the submission, enforcement or defense of legal claims.

(2) Where personal data are processed for scientific and historical research or statistical purposes, the data subject is entitled to object to the processing of personal data concerning him or her on grounds relating to his or her situation, unless such processing is necessary for the performance of a task carried out in the public interest.

12.8.1. Right to lodge a complaint to the supervisory authority

The data subject is authorized to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of employment or of the suspected infringement, if the data subject considers that the processing of personal data concerning him or her infringes the provisions of the GDPR. In Hungary, the competent supervisory authority is the following: Hungarian National Authority for Data Protection and Freedom of Information (website: <http://naih.hu/>; address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; postal address: 1530 Budapest, Pf.: 5.; Telephone: +36-1-391-1400; Fax: +36-1-391-1410; E-mail: ugyfelszolgalat@naih.hu).

12.9. RIGHT TO EFFECTIVE JUDICIAL REMEDY AGAINST THE SUPERVISORY AUTHORITY

- (1) The data subject is entitled to an effective judicial remedy against a legally binding decision of the supervisory authority on the data subject.
- (2) The data subject is entitled to effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments or the outcome of the lodged complaint.
- (3) Proceedings against the supervisory authority must be brought before the court of the Member State where the supervisory authority is established.

12.10. THE RIGHT TO EFFECTIVE JUDICIAL REMEDY AGAINST THE SERVICE PROVIDER OR THE DATA PROCESSOR

- (1) Without prejudice to the available administrative or non-judicial remedies, also including the right to complain to the supervisory authority, the data subject is entitled to effective judicial remedy, if he or she considers that his or her rights under the GDPR have been infringed as a result of inappropriate processing of their personal data under the GDPR.
- (2) Proceedings against the Joint Data Controllers or the data processor must be brought before the courts of the Member State in which the place of activities of any of the Joint Data Controllers or the data processor is established. Such proceedings may also be brought before a court of the Member State

in which the data subject has his or her habitual place of residence. Such a lawsuit falls within the jurisdiction of the regional courts in Hungary. The data subject may also, as he or she sees fit, bring an action before the regional court having jurisdiction over his or her place of residence or dwelling place. You can find out about the jurisdiction and contact details of the (regional) courts on the following website: www.birosag.hu.

13. HOW DO WE ENSURE THE SECURITY OF YOUR DATA?

The contributors and employees of the Service Providers participating in the data controlling and/or data processing are entitled to access personal data to a predetermined extent, subject to the obligation of confidentiality.

We protect personal data with appropriate technical and other measures, as well as ensure the security and availability of the data, and protect them from unauthorized access, alteration, damage, disclosure or any other unauthorized use.

As a part of our organizational measures, we control physical access in our buildings, continuously train our employees and keep paper-based documents locked with adequate protection. As a part of the technical measures, we use encryption, password protection and anti-virus software. We make every effort to make our processes as secure as possible, and we adhere to strict standards regarding the data we receive in order to ensure data security and prevent unauthorized access.

Data security in the IT infrastructure

- We have internal policies for the data security of the IT infrastructure that are detailed and include all relevant details, including data security and information security requirements.
- We store personal information on our leased servers located with a reliable server service provider. Strict security procedures ensure that unauthorized persons cannot physically access the system.
- The data storage facilities are located in lockable, air-conditioned rooms.
- To minimize data loss, we regularly back up our data.
- Access to the servers on the internal IT network is possible only after authentication with username and password. We test and verify our IT systems from time to time, repeatedly and regularly, to establish and maintain data and IT security.
- The use of network resources for users is regulated, limited and subject to authentication.

- Even office workstations can only be accessed with the correct username and password. The use of foreign media is only possible after automatic virus and malware filtering.
- We continuously protect the Service Provider's systems and system components against malicious software.
- In the design, development, testing, and operation of programs, applications, and devices, security functions are given priority and are separated.
- The access keys of the information system (e.g., passwords) are stored encrypted, the data concerning the security of the system (e.g., passwords, authorizations, logs) are protected when allocating access rights.

Data security in communication

- In the case of our mailing system, a multi-stage protection system has been developed on both the client and server side. Anonymous access to the system is not allowed. It is only possible to send an electronic message to a clearly identified person.
- When receiving an electronic message, we use a mail filter system and our system examines the origin and identity of the sender.
- The protection we use detects the occurrence of unauthorized penetration, modification, and intrusion. Error detection and repair procedures are used to prevent data loss and damage and to ensure non-repudiation.
- In the case of the network used for data transmission, we ensure the prevention of illegal connection and eavesdropping in accordance with the level of security.
- Connecting to our network remotely requires multi-level authentication.
- Connection to the on-site wireless network is only possible for a strictly regulated device with an authentication key that has already been identified on our system.

Data security during document management

- We also comply with the data security requirements set out in the document management policy during document management. Documents are managed according to written authorization levels, in accordance with the security standards applied to the confidentiality of each document. We have detailed and strict rules for the destruction, storage and release of documents.

Physical data security

- In order to establish physical data security, we ensure the proper closing and protection of our doors and windows, and we apply strict visitation and entry regulations for visitors.
- Paper-based documents containing personal data are placed in a locked cabinet that can only be accessed by a specific set of staff with proper authorization management.
- The storage rooms of data carrier devices are designed to provide adequate security against unauthorized or violent intrusion, fire or natural disaster. The data carriers used for data transfer, backup and archiving can only be stored in a securely closed place.

14. WHAT DO WE DO IF A DATA PROTECTION INCIDENT OCCURS?

In accordance with the law, we report the data protection incident to the supervisory authority within 72 hours of becoming aware of it, and we also keep records of data protection incidents. In cases specified by the law, we also inform the users concerned.

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ANNEX NO. 1.

List of the Contractual Partners of Dr. Lenkei Health Culture

Company name	Head office
AJ-TREND Kft.	9400 Sopron, Mátyás király utca 7.
AKTL Kft.	6400 Kiskunhalas, Csap utca 15.
ALPHA-DENT HIGIÉNIA Kft.	7700 Mohács, Táncsics Mihály utca 11.
Balaton Judit e.v.	6300 Kalocsa, Tompori P. utca 29.
Balog-Szabó Imre e.v.	2400 Dunaújváros, Szórád Márton út 15. FS em. 2 ajtó
BAUMTRADE KFT.	7150 Bonyhád, Vasvári Pál utca 2.
BIJÓ KUCKÓ Kft.	7100 Szekszárd, Kőrösi Csoma Sándor utca 18. IV. em. 15.
Biopeti Kft	5300 Karcag, Madarasi út 40/b.
BIO-SYSTEM BT.	4400 Nyíregyháza, Újszőlő u. 104.
CellClean Kft.	8100 Várpalota, Tomori köz 10.
Deli Balázs e.v.	3323 Szarvaskő, Iskola utca 8.
Expert Egészségliget Kft.	3000 Hatvan, Rákóczi út 62.
Éder Katalin e.v.	8900 Zalaegerszeg, Damjanich János utca 8.
Farkas Sándorné e.v.	3700 Kazincbarcika, Fő tér 2.
GAZDAGRÉTI Patika Kft.	1118 Budapest, Gazdagréti tér 6.
Gombár Tamásné e.v.	4080 Hajdúnánás, Ady Endre krt. 9.
Gönc-Boksz Kft.	2045 Törökbálint, Wesselényi utca 7.
HB MESTER EURO Kft.	4220 Hajdúböszörmény, Dorogi utca 20.
HERBAKER Kft.	4400 Nyíregyháza, Zrínyi Ilona u. 8-10.
Hóstop Trade Kft.	8500 Pápa, Világos utca 14.
Jozó Tamás e.v.	8693 Lengyeltóti, Kert utca 28.
KERSI Patika Bt.	2500 Esztergom, Kossuth u. 41.
KonzumBio Kft.	2800 Tatabánya, Dózsa György út 10.

Kovács Dénes e.v.	6500 Baja, Kápolna utca 13. B. ép.
Lisztes-Szerencsés Kft.	2519 Piliscsév, Béke utca 78.
LOYDIUM Kft.	2475 Kápolnásnyék, Vörösmarty utca 24.
M.L.ZS. Bt.	7624 Pécs, Alkotmány utca 75. 1. ép. földszint 35.
Magic Elixír Kft.	7570 Barcs, Séta tér 4/10.
Magyar János e.v.	4374 Encsencs, Béke utca 2. B ép.
Mátyás Zoltán Józsefné e.v.	5600 Békéscsaba, Lencsési út 24. 1 em. 5 ajtó
METRICAL Kft.	8330 Sümeg, Somoskert utca 2/7.
Novák József e.v.	3950 Sárospatak, Rákóczi út 66. 1 em. 2 ajtó
Oroszlán Gyógyszertár Bt.	2750 Nagykőrös, Tompa u 5.
OROSZ-PHARMA Gyógyszer-kiskereskedelmi Kft.	5200 Törökszentmiklós, Kossuth Lajos utca 125. földszint 1.
Ötvös Mihályné e.v.	6600 Szentés, Arany János utca 2.
Palotásné Debreceni Adrienn e.v.	2536 Nyergesújfalú, Kossuth Lajos utca 129.
Pelikán-Med Kft.	9700 Szombathely, Benczúr Gy utca 38.
PHARMA-REHA BT.	4025 Debrecen, Nyugati u. 5-7.
PIMPINELLA Bt.	8360 Keszthely, Tapolcai út 34/B
Prémium Vita Kft.	6100 Kiskunfélegyháza, Alpári út 29. A. ép.
REFORM - ABLAK Kft.	8800 Nagykanizsa, Teleki utca 42.
SCHALLER Bt.	7130 Tolna, Kossuth L. utca 29.
Somogyi Sándorné e.v.	2440 Százhalombatta, József Attila utca 9/A.
Szabados Tibor e.v.	1096 Budapest, Haller utca 80. 8 em. 34 ajtó
SZARVAS GYÓGYSZERTÁR BT.	5540 Szarvas, Eötvös u. 44.
SZARVAS Kft.	5100 Jászberény, Thököly utca 9.
Szedmák Jánosné e.v.	6200 Kiskőrös, Nap utca 2.
Szegedi Pálma e.v.	2330 Dunaharaszti, Fő út 21.
SZIVÁRVÁNYÚT Bt.	3100 Salgótarján, Rákóczi út 47.
SZUPER-VADA Kft.	3525 Miskolc, Dóczy József utca 30. C. ép. 3. em. 3.

dr. Lenkei

EGÉSZSÉGGKULTÚRA

Trics-Co Kft.	2045 Törökbálint, Kastély utca 1.
UNIOPHAR Bt.	6100 Kiskunfélegyháza, Alpári út 29/A
Végh Lilla e.v.	2030 Érd, Technikus utca 88.
Vitamin Liget Kft.	6100 Kiskunfélegyháza, Alpári út 29/a.
Zsigmond Ákos e.v.	9225 Dunakiliti, Kossuth Lajos utca 83.