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| **Privacy Policy****SWEETCHON****Introduction**Welcome on SWEETCHON’s website!The purpose of this Policy (hereinafter referred to as **Policy**) is to specify the principles, objectives and other facts of data processing according to the relevant legislation which defines the reason, the duration and the way of processing your personal data, and the enforcement rights and remedies you have related to the above.The security and the rightful process of your personal data is extremely important to us, therefore we ask you to read the present Policy closely and carefully. If you have any questions or comm ents regarding this Policy do not hesitate to contact us on the following e-mail address: info@sweetchon.com Our colleagues will be happy to help you. |
| **Concepts and definitions to be used in this Policy**The following is a brief summary of the most important definitions in this Policy.1. **Data subject:** any specific natural person identified or – directly or indirectly – identifiable based on personal data (hereinafter referred to as **User**).
2. **Data process:** data process shall mean performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data. Data processing is currently only executed by the Controller.
3. **Data processing:** data processing shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings.
4. **Controller:** shall mean SWEETCHON(hereinafter referred to as Controller) is processing the personal data provided by the User. The Controller’s data:
	1. Seat and mailing address: Uriel Hassine – SWEETCHON : Arlozorov St. 2, Raanana
	2. Company registration at 20/06/2021
	3. Tax ID No.: 327381570
	4. E-mail: info@sweetchon.com
	5. Phone number: +972-9-772-8-772
5. **Authority:**  Israel

**Website:** The Controller’s website [https://www.sweetchon.com](https://www.sweetchon.com/)1. **Approval:**the voluntary and expressed declaration of the will of the data subject, which declaration is based on appropriate information, and by means of which the data subject provides his or her unambiguous consent to managing the personal data concerning him or her – either wholly or in some operations.
2. **Objection:** the statement of the user by means, of which the data subject objects to the management of his or her personal data and requests the termination of the data management or the deletion of the data managed.
3. **Privacy Act:** Act CXII of 2011 on Informational Self-Determination and Freedom of Information.
4. **Personal Data:** Personal data provided by the User. Personal data shall mean every data relating to the User, all personal data which may be provided during such services shall be deemed as personal data (see at the chapter Purpose of the data processing).
5. **Cookie:** a file series, which may be created on the PC of the User by the host of the website, stores information about the User, and the relation between the User and his/her web server. The purpose of the usage of cookies is to identify the User’s PC, to provide simplified browsing and monitoring, furthermore to analyse and evaluate the use habits of the Website’s visitors, and to improve the user-experience.
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| **Principles of data processing**The following is a brief summary about the principles of data processing which the Controller entirely vindicates during the whole duration of data processing.1. **Principle of limitation of legal basis:** The Controller records and processes personal data during providing services partially through the Website and during pre-contractual request for information. The User by receiving the Service gives his/her consent to the Controller to process his/her personal data. In conformity with point a) in paragraph (1) of § 5 of the Information Act the User provides the following data based on his or her voluntary approval to keep contact with the customer:

› e-mail address› telephone number› family name, Christian nameThe Data Subject provides his or her approval of the data management by providing the aforementioned data voluntarily at the Sweetchon website and by using the website. The approval also includes the data collection, recording, registration, classification, storage, use, deletion and erasure related operations.The eligibility of the person providing the approval may not be checked based on the data provided for the Controller voluntarily (name, e-mail address). In case of using the services (website) the Controller considers the proper approval of the legal representative as provided.The Controller keeps the effective text of the Policy (and also its previous versions) available and known, constantly, without charges and obligations, both on the Website.1. **Principle of purpose limitation:** Personal data may be processed only for specified and explicit purposes indicated in the Policy. If the Controller wants to process the personal data for purposes other than the above, the Controller shall inform the User previously via e-mail.
2. **Duration of data processing:** The management of the personal data of the Data Subject lasts from the date of providing the data until the deletion of the data by the Controller. During the period of the data management the Data Subject may request the deletion of his or her personal data at any time.
3. **Principle of data minimisation:** In order to provide the highest possible Services, the Controller asks the consent of the User to process only the most necessary personal data. In all cases this data is necessary for the use of the Services. The controller shall act in accordance with the Policy, if he/she asks for further data from the User in addition to the Policy.
4. **Principle of data quality:** The purpose of the Controller is to process timely data in order to provide the highest possible Services.
5. **Principle of data security:** The Controller provides priority tothe security of the provided personal data, and in order to that he/she takes any necessary, technical and organisational steps and procedure adjusted to the current development of technology. The Controller acts in compliance with the data security requirements set forth in § 7 of the Information Act and respects the user’s privacy during the process of data management.
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| **Data – processing objectives**Objective of data management is to inform users showing interest in the services at the website, to keep contact with users, calling users back, answering questions raised by users, sending newsletters and performing the relevant administrative tasks. |
| **Informationondata management, transfer of data**The Controller informs - by the present Policy - the User of each fact in relation to the management of the personal data of the User in advance, unequivocally and in detail in order to have the User’s voluntary, expressed and explicit approval for the data management based on proper information. The User may gain knowledge of the present Policy at the Sweetchon website and make a statement on the acceptance of the Policy by using the website.The Controller states that the User’s personal data shall not be transferred to third parties.  |
| **Database managed to sending newsletters**When using Services User has the opportunity to subscribe for the Controller’s newsletter services (which contains promotions regarding Sweetchon, advertisement, programme guide). By ticking the subscribe button located on the Sweetchon website interface, the User gives his/her voluntary statement to approve of receiving newsletters with a direct marketing content at the e-mail address given by him/her. **Personal data which can be provided during subscription:** name, phone number, e-mail address. Registration number Related to data processing: **NAIH-\_\_\_\_\_\_\_\_\_**The Controller keeps a registration on the data of the persons making an approval statement. The personal data registered in these records may only be managed in accordance with the provisions set forth in the approval statement and until withdrawal.Newsletter frequency is estimated to be delivered once in a month, the main purposes of it are:News Technology,Firm Updates,Ecommerce,Maintain and nurture relationships with existing customersCreating opportunities with our potential audienceThe Controller reserves the right to modify the rate of occurance of sending newsletters.Sign up may be withdrawn anytime without any restriction, explanation and charges by the User, with clicking on the *“Unsubscribe from the newsletter”* button or via e-mail to info@sweetchon.com . In case of a cancellation, the e-mail address of the person making the statement shall be deleted from the registration without undue delay and no newsletter may be sent for the said person in an e-mail in the future.  |
| **Recording technical data (cookies)**While using the Website in addition to recording his/her personal data, his/her computer’s data which was generated during the use of the Website will be also recorded (cookies), and which was recorded, blogged (without any statement or action of the User) during the visit and leaving of the Website. This data should be used for producing records and statistics in connection with the visitors and the usage of the Website, furthermore the comprehensive development of the Website. The Controller shall not connect these data with the User’s personal data (except the cases by law), and only the Controller and his/her co-workers have access to them. User can delete the cookies from his/her computer anytime (with the help of the browser’s menu item for this), and he/she can set up the restriction of the cookies in the browser (typically with using of the “Help” button). The User acknowledges that without using cookies, the using of the website will not be complete. |
| **Enforcement and legal redress**The following is a summary about the rights of the user which may be validated against the Controller.1. **Communication with the Controller:** The communication between the Controller and the User happens via telephone, e-mail.
	1. Any e-mail, in connection with data processing shall be only examined and answered by the Controller, if it has been sent from the registered e-mail address of the User (expect the User submits in the e-mail that his/her registered e-mail address has changed, and the User can be identified easily).
	2. The Controller notifies the User via e-mail about all the actions he/she made (especially correction, blocking or deletion of personal data), in connection with his/her personal data within 8 (eight) days after the action. The notification may be waived if the action does not violate the User’s rightful interest (for example the User asked the correction of his/her personal data).
2. **Request for information:** User is entitled to request information about his/her personal data’s state, scope of data, content, the circumstances and effects of a possible data processing incident, prevention, and in general, about any question arising in connection with this Policy from registration to deletion of personal data.
	1. The Controller shall provide information to the User in the shortest possible time, but in less than 25 days (twenty-five) days after the User’s request (at first via e-mail or by post according to the explicit request of the User).
	2. The Controller is entitled to deny the information according to the cases defined in the Privacy Act. In these cases the Controller is obliged to point out the concrete article of the Privacy Act and at the same time he/she informs the User about the possibilities to bring proceedings to the Authority.
3. **Notification of changes in data:** User is entitled to notify the Controller about the changes in his/her data (according to the above via e-mail or by post) in writing. The Controller commits himself to fulfil the changes in the shortest possible time, but less than 8 (eight) days following the User’s notification. If the User fails to notify the Controller about the changes in his/her data without delay, the User shall bear the consequences of delay. If the provided personal data is incorrect, and the correct personal data is available for the Controller, the Controller automatically corrects it.
4. **Objection against data processing:** User is entitled to object to the processing of his/her personal data anytime, except if the law requires data processing. Objection is any declaration from the User in which he/she disapproves the processing of his/her personal data or claims the deletion of it.
	1. The User is entitled to object especially in those cases when the Controller processes his/her data to meet his/her legal obligations or interest, or when the direct purpose of data processing (using or forwarding data) is direct marketing, public opinion research, scientific research, or in other cases prohibited by law.
	2. The Controller is obliged to examine the User’s objection against data processing in the shortest possible time, but no more than 15 (fifteen) days after his/her request, and is also obliged to notify the User about his/her decision in writing. If the Controller considers that the User’s request is well founded, the Controller is obliged to terminate processing and to block the User’s personal data, and to inform those to whom he/she forwarded it, and also those who are obliged to take an action to ensure enforcement. If the User disagrees with the decision made by the Controller, the User is entitled to turn to court within 30 (thirty) days after the answer of the Controller. If the Controller fails to make a decision within the time prescribed above, the User is entitled to turn to court within 30 (thirty) days from the 15th day.
5. **Request for deletion:** The User may request the deletion of his/her personal data anytime. Data deletion shall mean making data unrecognisable in a way that it can never again be restored.
6. **Request for blocking:** The Controller is blocking the data besides deletion, if the User requests blocking, or according to the available information it is reasonable to suppose that deletion would violate the interest of the User. Blocking of data shall mean marking data with a special ID tag to indefinitely or definitely restrict its further processing.
7. **Proceeding of the Authority:** The User is entitled to request an investigation from the Authority on the grounds or the risk of infringement in connection with data processing. The investigation of the Authority is free of charge, the Authority shall advance the funds of the procedure. No one shall suffer prejudice on the account of notifying the Authority. Having submitted a notification to the Authority may not entail any discrimination against the notifier. The Authority may reveal the person of the notifier only if the inquiry cannot be carried out otherwise. If so requested by the notifier, the Authority may not disclose his identity even if the inquiry cannot be carried out otherwise.
8. **Judicial remedy:** In the event of any infringement of his/her rights, the User may turn to court action against the Controller, the case falls within the jurisdiction of the General Court. The law suit can be commenced – according to the User’s decision – before the competent court of the User’s domicile or residence. The competence of the court can be verifiable on the https://www.gov.il/he/Departments/the\_judicial\_authority website with the use of the “Court Search” application. The court shall hear such cases in priority proceedings.
9. **Compensation and restitution:** If the Controller cause damage to the User or someone else as a result of unlawful processing or by any breach of data security requirements he/she shall pay for such damages.
	1. If the Controller, by unlawful data processing or by breaching data security rules, violates the personal rights of the User, the latter may demand restitution from the Controller.
	2. If the Controller violates the rights of the personality of the User, the User has the right to demand compensation from the Controller.

The Controller shall be released from liability for damages and from paying restitution if he/she demonstrates that the damage or the violation of personal rights were brought about by reasons beyond his/her data processing activity. No compensation shall be paid and no restitution shall be demanded where the damage or the violation of rights was caused by intentional or serious negligent of the User.**Miscellaneous**1. The consent of the legal representatives (parents) is required to provide personal data by the Users that are under the age of 16.
2. Controller reserves the right to modify this Policy unilaterally anytime.
3. This Policy shall be governed by the Israeli law. In the case of matters not regulated in this Policy shall be governed by the provisions of the Privacy Act and other relevant Hungarian legislation.
4. This Policy operates from the date of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 2021. This Policy can be found on the Sweetchon website.

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