

MOLNAR GROUP EUROPE

Privacy Policy

The protection of your personal data is important to us!

Please take a moment to read this Privacy Policy and find out how company group Molnar, and its subsidiary "Molnar A LTD" named located at Evagora Palikaridi 6A/2 7080 Pyla, Cyprus, with registration number of registered companies HE442407 and e-mail address info@molnargroup.eu (hereinafter the "Company" or "we" or "our"), acting as Processor, collects, stores, uses and generally processes your personal data when you visit, register or use the Company's websites (hereinafter the "Websites") and its mobile applications (hereinafter the "Apps") as well as when you transact with its physical entities.

This Privacy Policy also describes how we use, share and protect your personal data, the choices you have regarding your personal data, and how you can contact us. For your questions regarding this Privacy Policy, but also any issue related to the processing of your Data and the exercise of your rights, you can contact the Legal Department of the Company Group at legal@molnargroup.eu .

I. A few words about the Company's Websites

www.molnargroup.eu is the Company's main website, where the Company's product display and sales online store is located.

Additionally, through the website www.molnargroup.eu , you can access a range of services provided by the Company, such as:

constructions in Sweden

real estate buy / sell / development / rental

products services to order or purchase

various investment possibilities

2. What is personal data

The term "personal data" refers to information of natural persons, such as name, postal address, e-mail address, telephone number, etc., which identify or can identify you, hereinafter "Personal Data" or "Data".

3. What is Personal Data Processing

Any act or series of acts performed with or without the use of automated means, on personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or alteration, retrieval, information retrieval, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, deletion or destruction.

4. It is mandatory to provide your Data

Providing the Data to the Company may be necessary to achieve the purposes specified in this Privacy Policy or may be optional.

If you refuse to provide the information marked as mandatory on the Websites, it will be impossible to achieve the main purpose of collecting the specific Data and it may, for example, make it impossible for the Company to fulfill the sales or other contract or provide the other services that are available on the Websites.

The provision of additional Data to the Company, beyond those marked as mandatory, is optional and does not have consequences regarding the main purposes of data collection, but its provision serves to optimize the quality of the services provided.

5. What Data we collect about you

We take care to collect only your absolutely necessary Data, which is appropriate and clear for the intended purpose. This Data includes the following:

Data when creating a user account on the Websites or Apps, such as first name, last name, email address, phone number, etc.

Information from your transactions with us, whether through our physical stores or through our online store, as well as our call center.

- For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, products added to or removed from your basket, wish list), coupon redemptions, websites you visit and how and when you contact us.

Interests and shopping preferences, which help us recommend specific products and services that interest you.

- For example, which products you show us a preference in order to receive a personalized offer from us.

We will only request and use the Data we have collected to recommend products or services of interest to you and further enhance your experience with us. Of course, it is always your choice whether to share such information with us.

Traffic data of our website or other websites that you have visited before us.

Information collected from the use of cookies in your browser. Learn more about how we use cookies here .

Details of the documents you provide or show to her to prove her age or identity, (police or student ID or passport details) when required by law or the Company's policies and in accordance with the provisions of applicable legislation.

- For example, in the case of receiving a pre-paid online (web) order from a physical store of the Company, we will ask it to show its identity card or other equivalent identity document, in order to be able to know that the recipient of the order is the same person as the person who placed the order and made the electronic payment.

Payment information.

Your comments and product reviews.

In order to provide the best possible website experience, we collect technical information about your internet connection and browser, as well as the country and telephone code where your computer is located, the web pages displayed when you visit, the advertisements in which you click and whatever search terms you entered. [Learn more here](#) .

Your social media username, if you interact with us through these channels, to help us respond to your questions or comments.

Educational information, such as studies, skills, knowledge of foreign languages, professional experience (only in cases where you are applying for a job)

6. How we use your Data

We want to give you the best possible experience. To achieve this it is necessary to obtain a complete picture of you by combining the Data we have collected. We then use your Data to offer you offers for products and services that are likely to be of interest to you.

The legislation for the protection of personal data allows us to do the above in the context of our legitimate interests, in order to provide you with a high level of service or in the context of the fulfillment of the contract between us.

Of course, if you ever want to change how we use your Data, you will find details in sections 14 & 15 'What your rights are' and 'How you can exercise your rights' below.

Remember, if you choose not to share your Data with us or refuse to be contacted by us, we may not be able to provide some services you have requested.

Finally, we inform you that the processing of your Data is carried out either by the specially authorized personnel of the Company, or through IT systems and electronic devices by the Company and exceptionally by third parties, who, having contractually committed themselves to the observance of confidentiality and the protection of With your data they carry out tasks necessary to achieve the purposes strictly related to the use of the Websites, services and the sale of products through the Websites. More information can be found below in section 9 "Who are the recipients of your Data? How your Data is shared".

Below you will find details of how we use your Data and why:

To provide information about the Websites, Apps and services you request

Product orders: The Company processes your Data in order to fulfill its contractual relationship, to process the order of products and/or services, to issue and send you your tax documents electronically (e-invoicing) to the electronic address (e-mail) which you yourself have declared to provide customer service, to comply with legal obligations, to refute, raise or exercise legal claims. If we do not collect your Data at checkout, either from our physical stores or from our online store, we will not be able to process your request and comply with our legal obligations. It may be necessary to transmit your Data to third parties for the supply or delivery of the product or service you have ordered, as well as the implementation of the electronic invoicing process by our Company, in accordance with the provisions of the applicable legislation. In addition, we may

retain your Data for a reasonable period of time in order to fulfill our contractual obligations, such as returns, as required by relevant law.

Creating a User Account (if applicable): The Company processes your Data in order to provide you with account functions and to facilitate the purchase of products and/or services.

Contact: The Company uses your Data to respond to your requests/queries, refund requests and/or complaints. The information you share with us enables us to manage your requests and respond to you in the best possible way. We may also keep a record of your queries/requests to us to better respond to any future communications. We do this based on our contractual obligations to you, our legal obligations and our legitimate interests to provide you with the best possible service and to be able to improve our services based on your own personal experience.

Sometimes, we will need to share your Data with a third party that provides a service (such as courier delivery or a technician visiting your home). Without you sharing your personal data, we would not be able to fulfill your request.

Finding a Job: The Company processes your Data for the evaluation of your qualifications and abilities for the position for which you applied or for another position within the Company as well as for the purposes of communicating with you in relation to this purpose.

To share information about our products, services and events and for other promotional purposes

Sending a newsletter/offers: With your consent or based on the Company's legitimate interest (where required by law), we will use your personal data, preferences and transaction details to inform you via e-mail, sms/viber, internet, phone and/or via social media for related products and services, including personalized/personalized offers, discounts, etc. In particular, in the event that you have registered for the Company's newsletter "Come to Our company", we will send you communications with promotional content based on your consent, while in the event that you have created an account or made a purchase, you will receive communications for the purposes of commercial promotion of our

products and/or services based on the legitimate interest of the Company in the context of article 106 par. 2 of Law 112(I)/2004. To find out how you can object to the processing of your Data for marketing purposes, please see section 14 "What are your rights" below.

Web push notifications: Depending on your navigation, you may receive, having previously given your consent, notifications about our offers, news, your wish list and your shopping cart. Of course you have the possibility to withdraw this consent at any time.

Participation in Contests: The Company processes your Data, in case you wish to participate in contests it conducts, to notify you if you are the winner of the contest and to deliver your prize.

To operate, improve and maintain our business, products and services

Development and improvement of systems and services for the products we provide to you. We do this based on our legitimate business interests.

We want to provide you with offers and suggestions that are most relevant to your interests. To help us form a better and more general understanding of you as a customer, we combine your personal data collected throughout the relationship between us, for example your purchase history in both our physical stores and our online store. For this purpose, we also combine the Data we collect directly from you with Data we receive from third parties to whom you have given your consent to transfer this data to us. For example, by combining this data, this will help us customize your experience and decide what inspiration or content to share with you. We also use anonymized data from customer purchase history to identify trends in different regions of the country. This can then guide which products we display in specific stores.

To show you the most interesting content on our Websites or Apps, we will use the Data we hold about your favorite products. This is based on your consent to receive Apps notifications or - for our Sites - your consent to placing cookies on your device. For example, we may display a list of products you have recently viewed or offer you recommendations based on your purchase history and any other Data you have shared with us.

To send you research and evaluation requests so that we can improve our services. These messages will not contain advertising content and do not require prior consent when sent by email or text message (SMS/viber). We have a legitimate interest in doing so as it helps our products or services to be more relevant to you. Of course, you are free to opt out of receiving these requests from us at any time by sending us a request, as more specifically set out in section 15 “How you can exercise your rights” below.

To protect our or third parties' rights, property or safety

Protecting your account from fraud and other illegal activities : This includes using your Data to maintain, update and protect your account. We also monitor browsing activity with us to quickly identify and resolve any issues and protect the integrity of our website. All of the above are part of our legitimate interest. For example, we check your password when you log in and use automated IP address tracking to detect potential fraudulent logins from unexpected locations.

Operation of CCTV Systems : In order to protect our customers, premises, assets and associates from crime, we operate CCTV systems in some of our buildings that record images for security. We do this based on our legitimate business interests. If we detect any criminal activity or alleged criminal activity through the use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this Data for the purposes of preventing or detecting illegal activity. Our goal is to protect our customers, employees and partners from criminal activities.

Processing payments and preventing fraudulent transactions : We do this based on our legitimate business interests. This also helps protect our customers from fraud.

For our compliance with our obligations arising from the law

To comply with our contractual or legal obligations to share data with law enforcement. For example, following a court order to share data with judicial services.

To send you communications that are required by law or that are necessary to inform you of changes to the services we provide to you . For example, updates on these privacy notices, product recall notices, and legally required information about your orders. These service messages will not contain advertising content and do not require prior consent when sent by email or text message (SMS/viber). If we do not use your personal data for these purposes, we cannot comply with our legal obligations.

7. For what purpose do we process your Data?

We collect your Data for the purposes of the products and/or services provided by our Company and in particular for:

a) managing the sale of our products/or services, e.g. communicating and informing you about the availability of products and the progress of your order, the issuance and sending of your tax documents in electronic format (e-invoicing), the execution of your order, the shipment of products, the management of your debts to the Company, making returns and providing guarantees.

b) serving you based on the current government measures,

c) compliance with the obligations imposed by the current legislation, e.g. tax legislation, e-commerce directive,

d) checking, improving and adapting to your preferences and choices regarding our products and/or services,

e) sending, by electronic or traditional means, administrative, technological, organizational and/or commercial information about the Company's products and/or services.

f) the satisfaction survey of our customers, the promotion of our products and/or services, the sending of newsletters about our products and/or services.

g) the evaluation of applications and CVs for the purpose of recruitment to our Company.

h) ensuring proof of transactions during the recording of our telephone calls, in case of your communication with the representatives of our call center.

i) the protection of persons, goods and rights of the Company, our customers or third parties (e.g. in the case of recording an image through closed circuit video surveillance (CCTV) or showing identity documents to receive prepaid online orders from a physical store).

8. What is the legal basis for processing your Data by the Company?

Data protection legislation sets out various reasons why the Company may collect and process your personal data, including:

the fulfillment of our contractual relationship.

the legal interest of our Company. In certain cases, we collect your Data in a way that can reasonably be expected as part of the operation of our business and that does not materially affect your rights, freedom or interests. For example:

- We will send you updates of promotional content for the Company's products and/or services in the context of article 106 par. 2 of Law 112(I)/2004, after creating an account or making a purchase in our online store and if you have not objected to the collection and use of your Data for the above purpose.

- We will use your purchase history to send you or make available personalized offers.

- We also combine the purchase history of many customers to identify trends and ensure that we can keep up with market demand or develop new products / services.

9. Who are the recipients of your Data – How is your Data shared?

Access to your Data is given to the absolutely necessary personnel of the Company, who are committed to confidentiality and the companies cooperating with us or third-party service providers, which process your Data either as independent Processors or as Processors on our behalf and according to our orders.

Disclosure of Data by the Company

The Company shares your Data with:

Companies of the Company's group for the purposes and in the context of the conditions mentioned above in section 7 of this Privacy Policy

Stores and/or commercial businesses that work with the Company to sell their products/services.

Third party service providers who process personal data on behalf of the Company, for example (indicatively listed) for credit card and payment processing, electronic issuance and sending of your tax documents (e-invoicing), transport and deliveries, hosting, management and maintenance of our data, email distribution, research and analysis, management of brand and product promotions, Google, Facebook, and management of certain services and data. When we use third party service providers we enter into agreements obliging them to implement appropriate technical and organizational measures to protect your personal data.

Other third parties, to the extent required for the following purposes: (i) compliance with government request, court order or applicable law, (ii) preventing illegal uses of our Websites and Apps or violations of our Websites and Apps Terms of Use and our policies, (iii) our own protection against third party claims, and (iv) helping to prevent or investigate cases of fraud (e.g. counterfeiting)

To other third parties when you yourself have given your consent.

Notification by you

When you use certain social media features on our Sites or Apps, you may create a public profile that includes information such as your username, profile picture, and city. You may also share content with your friends or the general public, including information about your interaction with the Company. We encourage you to use the tools we provide to manage Company social media sharing to control the information you make available through Company social media assets.

The following is the policy we apply to those with whom we share your Data in accordance with the above:

We provide only the information needed to perform their specific services.

They may only use your Data for the precise purposes we set out in our contract with them or are required by law.

We work closely with them to ensure that your privacy is respected and protected at all times.

If we stop using their services, any of the data you hold will be deleted or anonymized.

Acceptable of your Data based on the above are indicatively the following providers/partners of the Company:

E-satisfaction

Google

Facebook

Link-wise

MoEngage

Global Link

Mirakl

Bitrec

Twitter

YouTube

ACS

Instagram

Yahoo

M-stat

Oracle

Sendpulse

BestPrice

SoftOne

Algolia

ForestView

Digital Experience

Kantar

GT Digital

10. How do we ensure that Processors respect your Data?

The Processors on our behalf have agreed and contractually committed to the Company:

to maintain confidentiality,

not to transmit your Data to third parties without the Company's permission,

take appropriate technical and organizational security measures,

to comply with the legal framework for the protection of personal data and in particular Regulation 979/2016/EU (otherwise known as GDPR).

11. International Data Transfer

The personal data we collect (or process) in the context of our Websites and Apps will be stored in Hungary. However, some of the Data recipients with whom the Company shares your Personal Data may be located in countries other than the one in which your Personal Data was originally collected. The legislation in those countries may not provide the same level of data protection compared to the country that originally provided your Personal Data. However, when we transfer your Personal Data to recipients in other countries, including the US, we are committed to protecting your Personal Data as described in this Privacy Policy and in accordance with applicable law.

We take steps to comply with applicable legal requirements for the transfer of personal data to recipients in countries outside the European Economic Area,

including signing the European Commission's Model Contractual Clauses for data transfers to third countries, in order to ensure that your Personal Data transferred to these countries enjoy adequate protection under data protection rules.

12. How long do we keep your Data?

We retain your Personal Data for as long as necessary to fulfill the purposes set out in this Privacy Policy (unless a longer retention period is required by applicable law). In relation to your Personal Data related to product purchases, we retain this data for a longer period in order to comply with our legal obligations (such as tax and commercial law and for warranty purposes). At the end of this retention period, your data will be completely deleted or anonymized, for example by aggregating with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

Orders

When you place an order, we will keep the personal data you have given us for five years so that we can comply with our legal and contractual obligations. In the case of some products, such as electrical goods, we will keep the data for 10 years.

Guarantees

If your order included a warranty, the relevant personal data will be retained until the end of the warranty period.

Newsletter ("Come to our Company")

Your declaration of consent to send a newsletter is kept by the Company, until you decide to delete yourself from our relevant list or withdraw your consent. In the event that you ask us to unsubscribe, we will ensure that your information is immediately deleted from the relevant list.

13. Is your Data secure?

We are committed to safeguarding your Personal Data.

Recognizing the importance of the security of your Personal Data, we have taken all appropriate organizational and technical measures to secure and protect your Data from any form of accidental or unlawful processing. We use the most modern and advanced methods to ensure maximum security.

14. What are your rights?

You have the right to access your personal data.

This means that you have the right to be informed by us if we are processing your Data. If we process your Data, you can ask to be informed about the purpose of the processing, the type of your Data we keep, to whom we give it, how long we store it, whether automated decision-making takes place, but also about your other rights, such as correction, deletion of data, restriction of processing and filing a complaint with the Personal Data Protection Authority.

You have the right to correct inaccurate personal data.

If you find that there is an error in your Data you can submit a request to us to correct it (eg correct a name or update a change of address).

You have a right to erasure/right to be forgotten .

You can ask us to delete your data if it is no longer necessary for the aforementioned processing purposes or if you wish to withdraw your consent in the event that this is the only legal basis.

You have the right to portability of your Data.

You can ask us to receive the Data you have provided in readable form or ask us to pass it on to another controller.

You have the right to restrict processing.

You can ask us to restrict the processing of your Data pending the consideration of your objections to the processing.

You have the right to object and withdraw consent to the processing of your Data.

You can object to the processing of your Data and we will stop processing your Data, unless there are other compelling and legitimate reasons that override your right. If you have given your consent to the collection, processing and use of your personal data, you can withdraw your consent at any time with future effect. The withdrawal of your consent does not affect the lawfulness of processing based on the consent provided before its withdrawal.

Opting Out of Receiving Marketing Communications .

You may choose not to receive marketing communications for the Company's products and/or services:

a) by clicking on the relevant link to unsubscribe from communications (unsubscribe link) included in each message of promotional content that you receive from the Company.

b) Alternatively you can contact us using the contact details in the 'contact' section from the websites' menu.

In case we rely on our legitimate interest.

In cases where we process your personal data based on our legitimate interest, you can ask us to stop for reasons related to your personal situation. We must then do so unless we believe we have a compelling legitimate reason to continue processing your Personal Data.

15. How can you exercise your rights?

To exercise your rights, you can submit a request to the Legal Department at the Company's postal address (Molnar A LTD, Evagora Palikaridi 6A/2, 7080 Pyla, Cyprus) or at email address legal@molnargroup.eu or info@molnargroup.eu with the title "Exercise of Right" and we will make sure to look into it and answer you as soon as possible.

Exceptionally:

if you wish to correct your Data in your user account, you can log in to it and make any correction/change to your data (with the exception of your email address), without the need to submit a Request.

if you wish to opt-out of receiving marketing communications, you can follow one of the options listed above in the "Opting Out of Marketing Communications" section.

if you wish not to receive web push notifications from the Company, you can disable the option from your browser settings.

Identity check

For your own safety and to protect the confidentiality of your information, we reserve the right to obtain further information necessary to confirm your identity when responding to an existing request. In addition, in the event that you cannot be identified, we reserve the right to refuse to respond to your request. If you have authorized a third party to make a request on your behalf, we will ask them to demonstrate that they have your permission to act for this purpose.

16. When do we fulfill your Requests?

We satisfy your Requests free of charge without delay, and in any event within (1) one month of receiving your request. However, if your Request is complex or there are a large number of your Requests we will inform you within the month if we need to obtain an extension of another (2) two months within which we will satisfy it.

If your Requests are manifestly unfounded or excessive in particular due to their repetitive nature, the Company may impose a reasonable fee, taking into account

the administrative costs of providing the information or carrying out the requested action, or refuse to proceed with the Request .

17. What is the applicable law when we process your Data?

Applicable Law is Cypriot Law, as formulated in accordance with the General Regulation for the Protection of Personal Data 2016/679/EU and in general the applicable national and European legislative and regulatory framework for the protection of personal data.

Competent courts for any arising disputes related to your Data are the Courts of Nicosia.

18. Where can you go if we breach the applicable law for the protection of your Personal Data?

You have the right to submit a complaint to the Office of the Personal Data Commissioner (postal address T.TH. 23378, 1682 Nicosia, e-mail address commissioner@dataprotection.gov.cy), if you consider that the processing of of your Personal Data violates applicable national and regulatory law on the protection of personal data.

19. How will you be informed of any changes to this Policy?

We update this Privacy Policy whenever necessary. If there are significant changes to the Privacy Policy or the way we use your Personal Data, we will post an update to this on our website before the changes take effect and we will notify you as soon as possible.

We encourage you to read this Policy periodically to know how your Data is protected.

This privacy policy was last modified on 10/18/2023.

20. Questions and Comments?

We hope this Privacy Policy has helped you understand how we handle your Personal Data and your rights to control the handling by our Company.

If you have any questions that have not been covered, or comments and concerns you may have about our Privacy Policy please contact our data protection officer who will be happy to assist you:

Email to the email address: legal@molnargroup.eu or letter to the Legal Department at (Molnar A LTD, Evagora Palikaridi 6A/2, 7080 Pyla, Cyprus) all of these points are to be done and signed after the leave of all guests.