

**PROVIDING OF INFORMATION CONCERNING DATA PROCESSING  
FOR THE MEMBERS OF  
LAVYLITES NETWORK MARKETING**

**1. PREAMBLE**

Lavylites World Ltd. (1a Falmer Court, London Road, Uckfield, England, TN22 1HN, company registry number: 12008782, hereinafter: '**Controller**') provides information by this notification on the processing of data and the rights and legal remedies, of those natural persons, who are or who wish to become members of the marketing and sales network (hereinafter: '**Lavylites Network Marketing**') in accordance with separate policies (hereinafter: '**Lavylites Policies**') of the Controller in order to carry out sales and marketing activities (hereinafter jointly: '**Data Subject**'). The ordering of Products and joining Lavylites Network Marketing and exercising the membership rights happens via the website [www.lavylites.com](http://www.lavylites.com) (hereinafter: '**Website**') as well as via the the webshop operating on this "ebsite (hereinafter: '**Webshop**'), all maintained by Lavylites Worldwide Zrt. (1053 Budapest, Veres Pálné u. 9. fsz. 6, hereinafter: '**Controller-2**');

The Controller processes the Data Subject's personal data in course of operating the Lavylites Network Marketing in accordance with this policy.

**2. NAME AND CONTACT DETAILS OF THE CONTROLLER**

name: **Lavylites World Ltd.**  
registered office: 1a Falmer Court, London Road, Uckfield, England, TN22 1HN, company registry number: 12008782

**Data protection supervisor (contact point) of the Controller and their contact details**  
managing director of the Controller, postal address: 1a Falmer Court, London Road, Uckfield, England, TN22 1HN, email address: [lavylites@lavylites.com](mailto:lavylites@lavylites.com)  
**The name and contact details of the appointed joint data protection officer in the Controller's corporate group**  
(currently not applicable)

**3. SIGNIFICANT LAWS, REGULATIONS AND FUNDAMENTAL NOTIONS SERVING AS BASIS FOR PROCESSING DATA**

- Hungarian Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter: '**Infotv**');
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: '**GDPR**');
- Hungarian Act V of 2013 on the Civil Code (hereinafter: '**Ptk.**');
- Hungarian Act CVIII of 2001 on Electronic Commerce and on Information Society Services (hereinafter: '**Eker.tv**');
- Hungarian Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: '**Pmt.**');
- Hungarian Act CLV of 1997 on Consumer Protection (hereinafter: '**Fttv.**');
- Hungarian Act C of 2000 on accounting (hereinafter: '**Act on Accounting**');
- Hungarian Act CL of 2017 on the order of tax payment (hereinafter: '**Taxation Act**');
- The Controller's at all times effective Data Processing and Data Protection Policy (hereinafter: '**Privacy Policy**') is available on the Controller's website. The fundamental notions in connection to the processing and protection of personal data are included in the Privacy Policy's relevant chapter.

**4. THE PURPOSES OF THE DATA PROCESSING**

The Controller processes the **personal data** required and satisfactory to identify the private persons or the **executive officers, private person owners and beneficial private owners or other private persons acting in their place** of non-private person clients, as (jointly) Subjects who wish to establish contact, or a contractual relation, or who are already in an established contractual relation with the Controller in order **to monitor the creation, specification, modification of legal relationships and contracts** with private persons, legal persons and organisations without legal personality as clients who wish to become or already are members of Lavylites Network Marketing maintained and operated by the Controller; **to keep a register of payments** originating from the former and **to enforce claims** in connection to these payments; and **to answer and process comments or questions and to handle complaints.**

**5. LEGAL BASIS OF DATA PROCESSING**

The legal basis of data processing in order to fulfil the agreement being concluded between the Data Subject (registering and acting as a member) and the Controller regarding the services of Lavylites Network Marketing aiming to provide these services, is **point (b) of Article 6 (1) of GDPR**; that is the data processing is required to prepare or fulfil a contract in which the Subject is one of the parties, whilst the legal basis of claims originating from agreements is **point (f) of Article 6 (1) of GDPR**; that is the processing of data is necessary to enforce the Controller's legitimate interests.  
Furthermore the legal basis of data processing, regarding the Data Subject's personal data that is required by a legal act to be prescribed or transferred is **point (c) of Article 6 (1) of GDPR**; that is the processing of data is necessary to fulfil the Controller's legal obligations.  
The legal basis of the data processing besides the above scope of personal data is **point (a) of Article 6 (1) of GDPR**, that is the Data Subject's consent.

**6. SCOPE OF PROCESSED DATA AND THE SPECIFIC PURPOSE OF PROCESSING**

Processed personal data and its categories	Purpose of data processing	Legal basis of data processing	Period of data processing	Name of joint data controller, and contact details of their representative and data protection officer (if such exists). For the Controller, the representative and joint data protection officer appointed in the Privacy Policy shall always be regarded as that.
Natural person's name and e-mail address	Answering comments and questions sent or asked on the Website, or via the contact e-mail; communication	Point (a) of Article 6 (1) of GDPR	Until the withdrawal of permission or 30 (thirty) days following the answer to the question (whichever occurs sooner)	The Controller-2 transfers the comments submitted on the Website and Weboffice operated by him related to Lavylites Network Marketing to Controller, as well as answers the technical and IT related questions in connection to the Website or the Webshop.

Natural person's name, e-mail address, address, username, language, sponsor's name and password, phone number	Online identification, determination and registering of rights and qualifications of members and those who wish to become members of Lavylites Network Marketing	Point (b) of Article 6 (1) of GDPR	Until the expiry of the general statutes of limitation period of 5 (five) years following the termination of the membership in Lavylites Network Marketing (contractual relationship) (Section 6:22. (1) of Ptk.). Pursuant to Act on Accounting, the term of data processing is 8 (eight) years following the termination of the membership (contract) regarding the data processed with a view to issue and preserve accounting documents (Section 169. (2) of Act on Accounting). Processing and preserving accounting documents: until the lapse of right to charge tax, which means 5 (five) years after the end of the year of the tax declaration based on the given accounting document (Section 47. (1) and 164. (1) of the Taxation Act)	The Controller-2 through and in order to the maintenance and operation of the Weboffice operated by him, the Controller-2 in order to record and account the orders placed in the Webshop within Lavylites Network Marketing.
Natural person's tax ID no., bank account number (IBAN and SWIFT), name and address of account-holder bank, ID card number	Finalisation of identification, establishment and recording of rights and qualifications of actual and prospective members of Lavylites Network Marketing performing payments to them	Point (b) of Article 6 (1) of GDPR	Until the expiry of the general statutes of limitation period of 5 (five) years following the termination of the membership in Lavylites Network Marketing (contractual relationship) (Section 6:22. (1) of Ptk.). Pursuant to Act on Accounting, the term of data processing is 8 (eight) years following the termination of the membership (contract) regarding the data processed with a view to issue and preserve accounting documents (Section 169. (2) of Act on Accounting). Processing and preserving accounting documents: until the lapse of right to charge tax, which means 5 (five) years after the end of the year of the tax declaration based on the given accounting document (Section 47. (1) and 164. (1) of the Taxation Act)	The Controller-2 through and in order to the maintenance and operation of the Weboffice operated by him, the Controller-2 in order to record and account the orders placed in the Webshop within Lavylites Network Marketing.
Natural person's phone number, Skype ID, photo	Facilitating communication within Lavylites Network Marketing	Point (a) of Article 6 (1) of GDPR	Until withdrawal of consent	Controller-2 in course and with the purpose of operating the Weboffice and other promotional tools;
Natural person's name, address	to enforce the Controller's claims originating from the aforementioned legal relationships (handling, collecting receivables, enforcing other claims)	Point (f) of Article 6 (1) of GDPR	Until the expiry of the general limitation period of 5 (five) years following the termination of the membership (contractual relationship) or in case of enforcement of claims on either the Controller's or against the Controller on the Data Subject's side, following the final and binding evaluation of the claim (Section 6:22. (1) of Ptk.).	none
The personal data required through the conduct of ethical, conciliatory and other internal processes related to or concerning a given Data Subject, as prescribed by the Controller as part of Lavylites Network Marketing (all of the Data Subject's personal data processed by the Controller)	The conduct and execution of ethical and internal processes pursuant to the Lavylites Policies	Point (b) of Article 6 (1) of GDPR	Until the expiry of the general statutes of limitation period of 5 (five) years following the final closing of processes.	The Controller-2 in order to execute the resolution, or measure of a specific process. In order to conduct a process, the third parties participating pursuant to the actual Lavylites Policies
The subscribing person's: - full name - e-mail address - phone number	Regular sending of electronic newsletters and phone text messages presenting the Controller, his services, events, promotional offers	Point (a) of Article 6 (1) of GDPR	Until withdrawal of consent	none

in case of a minor under the age of 14: - parent's or guardian's name, e-mail address, phone number	and Lavylites Network Marketing in other ways			
Partner identification number (Partner ID), full name, email address, profile image access link (avatar URL), and technical identifiers necessary to provide access	Providing access to the digital training platform (Lavylites Academy), educational materials, videos, document repository and related training services available to members of the Lavylites Network Marketing system; management of access rights and user identification	Article 6 (1) (b) of GDPR	Until termination of the membership relationship or until the related access rights are terminated	For the purpose of operating the Academy platform connected to the Weboffice operated by the Controller

Manners of physical keeping of data may include: printed document, electronic data

The ones who may access the data at the Controller: manager, employees at consumer supports, logistics, distribution and financial department.

The data is stored in the Controller's main office and own servers.

## 7. PROCESSING OF DATA, TRANSFER OF DATA

The Controller informs Data Subjects that those shall be entitled to access and process the data, to whom the access to the data is indispensable to fulfilment of their function. Within the Controller's organisation the Data Subjects' personal data shall be transferred exclusively in accordance with purpose limitation and access shall only be granted in case of an adequate purpose. The transfer of data between the Controller's centre and individual departments is necessary to fulfil the public functions in the most efficient manner, and to ensure the legal, financial and technical conditions of performing functions, but it shall always happen in accordance with purpose limitation.

The Controller may transfer the Data Subject's data to a third party, in addition to the aforementioned, based on the written consent of the Data Subject or to fulfil a legal requirement. Pursuant to point (f) of Article 13 (1) of GDPR the Controller states, that they do not transfer data handled by them to a third country or an international organisation at the time this notification. The Controller during the processing of data uses the data processors and for purposes always as set out in the Privacy Policy. During the operation of the personal webshop, upon the Customer's explicit consent, the Data Controller may transfer the Customer's name, e-mail address, and telephone number to the Partner associated with the personalized webshop.

For the purpose of technical operation of the digital training platform made available to members of the Lavylites Network Marketing system (Lavylites Academy), management of user access rights, and ensuring access to educational content, the Controller engages the following data processor: Univerzum 8

The data processor acts solely on the basis of the Controller's written or electronic instructions, without any independent purpose of data processing, and is entitled to access and process personal data of the data subjects only to the extent strictly necessary for the technical operation of the Academy platform. In connection with the Academy platform, the following personal data may in particular be transferred: Partner identification number (Partner ID), full name, email address, profile image access link (avatar URL), and technical identifiers necessary to provide access.

## 8. THE DATA SUBJECT'S RIGHTS

Data Subject may require information of the processing of their personal data, and may require access to their personal data, the rectification of their personal data, the erasure of their data on the Controller's e-mail address, and the restriction of data processing. The Controller must bring to the Subject's attention their decision regarding these within 30 (thirty) days after the arrival of the request.

### Right of access

Data Subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.

### Right to rectification

Data Subject shall have the right to request the rectification or supplement of processed personal data concerning him or her.

### Right to erasure ('right to be forgotten')

Data Subject shall have the right to request the erasure of his or her processed data. The request concerning the erasure shall be denied in case of an obligation to store the data.

### Right to restriction

Data Subject shall have the right to request the restriction of his or her personal data (with the clear marking of the restricted art of the data processing and ensuring their separate processing from other data). The restriction shall last until the cause, designated by the Subject, makes it necessary.

### Right to object

Data Subject has the right to object, thus shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her in connection to a task carried out in the public interest or in the exercise of official authority vested in the controller, or to the processing in connection to the purposes of the legitimate interests pursued by the controller or by a third party.

### Right to withdraw consent

If the data processing is based on the consent of the Data Subject, the Data Subject has the right to withdraw his or her consent with a written declaration addressed to the Controller at any time, but this shall not affect the lawfulness of processing based on consent before its withdrawal or based on other legal basis.

### Complaint and remedy

Data Subject has the right to lodge a complaint with the supervisory authority, to initiate their proceedings, or to seek judicial remedy, if he or she considers that regarding the processing of data or the exercise of his or her rights in connection to the data processing were infringed.

Contact details of the supervisory authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság

address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c,

e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

In case of seeking judicial remedy the court of the Controller's head office is competent for the lawsuit, but the lawsuit – based on the choice of the subject – can be initiated at the court of the address or residence of the concerned person.

While respecting the aforementioned rights we ask the Data Subjects that before turning to the supervisory authority or the court with their complaints, get in touch with our Company in order to reconcile and to resolve the problem as fast as possible.

