

Privacy Policy of PhantomXM Website

Welcome to the PhantomXM website! (hereinafter referred to as "Website")

Thank you for visiting our Website! MS International Kft., as the Data Controller, provides this Privacy Policy (hereinafter referred to as "Policy") regarding the processing of personal data related to the services offered through the Website and other data processing activities carried out by the company. By using our services, you provide us with information that qualifies as personal data. We handle these personal data strictly in accordance with the purpose of data processing, to the necessary extent, in a lawful manner, and for the required duration, ensuring compliance with legal regulations – particularly the General Data Protection Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND COUNCIL (hereinafter "GDPR"). We take the necessary data security, technical, and organizational measures at a high standard to ensure data protection. Please read the following Policy for details on data processing.

If you have any further questions regarding the contents of this Policy or the processing of your personal data, please feel free to contact us using one of the following contact details.

Effective: Data collection based on voluntary consent, stored until revoked.

DATA CONTROLLER

The entity responsible for processing personal data under this Policy:

MS International Kft.

Registered address: 1023 Budapest, Ürömi utca 43.

Company registration number: 01 09 199280

Tax number: 25092017-2-41

(hereinafter referred to as "Data Controller")

For inquiries regarding data processing, please contact us at:

Mailing address: 1023 Budapest, Ürömi utca 43.

Email: inquire@phantomshopping.hu

Website: <https://phantom-xm.com>

I. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

Purpose of data processing:

- **Direct marketing database development:** Using personal data provided during subscription to electronic direct marketing messages (newsletters), building a direct marketing database based on profiling, and sending personalized and targeted advertisements, offers related to the services of the Data Controller to the provided email address.
- **Contacting:** Managing inquiries and complaints related to the Data Controller's services through the email address available on the Website.

Method of data processing: Electronic

Legal basis for data processing:

- **Consent:** Pursuant to Article 6(1)(a) of the GDPR – concerning newsletter subscription and contact initiation. You have the right to withdraw your consent at any time. Withdrawal does not affect the legality of data processing based on prior consent.
 - **Legitimate interest:** Analyzing website usability and quality.
 - **Legal obligation:** Pursuant to Article 6(1)(c) of the GDPR – processing may be required in response to authority or court requests.
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II. CATEGORIES OF PERSONAL DATA PROCESSED

For newsletter subscription:

- Name
- Email address
- Company name

For contacting:

- Name
 - Email address
 - Phone number
 - Subject and content of inquiry
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III. DATA RETENTION PERIOD

| Purpose of Processing | Legal Basis | Retention Period |
|-------------------------|----------------------|--------------------|
| Contact inquiries | GDPR Article 6(1)(b) | 1 year |
| Newsletter subscription | GDPR Article 6(1)(a) | Until unsubscribed |

IV. DATA TRANSFER AND DATA PROCESSING

Your personal data will not be disclosed to third parties unless required by law or if subcontracted data processors (e.g., newsletter services, hosting providers) are engaged.

The following data processors operate on behalf of the Data Controller:

- **Tukan Agency Kft.** (Registered address: 1031 Budapest, Varsa utca 14. 3rd floor, 9th door) – responsible for the technical maintenance of the Website. This company does not process data but has full access to the database for troubleshooting purposes.

- **Teratorium Online Kft.** (Registered address: 1119 Budapest, Hadak útja 2. XIV./151.) – provides IT infrastructure for MS International Kft. but does not engage in data processing or handling.
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V. RIGHTS OF DATA SUBJECTS

As a data subject, you have the following rights:

- **Right of access:** You have the right to request confirmation of whether your personal data is being processed and access the related information.
 - **Right to rectification:** You may request the correction of inaccurate personal data without undue delay.
 - **Right to erasure:** You can request the deletion of your personal data without undue delay.
 - **Right to restrict processing:** You have the right to request the restriction of data processing.
 - **Right to data portability:** You may receive your personal data in a structured, commonly used, machine-readable format and transfer it to another controller.
 - **Right to object:** You may object to the processing of your personal data at any time.
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VI. DATA SECURITY

The Data Controller ensures the security of personal data through appropriate technical and organizational measures, particularly against unauthorized access, alteration, transfer, disclosure, deletion, or destruction.

VII. HANDLING DATA BREACH INCIDENTS

A data breach is any incident that allows unauthorized access to personal data or results in the destruction, loss, or alteration of such data (e.g., database destruction or loss of a storage device containing data). In the event of a data breach, we assess the impact and risks (what data is affected, the quantity, recoverability, etc.) and take immediate remedial action. If risks cannot be mitigated, we report the incident to the data protection authority within 72 hours of becoming aware of it and publish relevant information on our website.

VIII. LEGAL REMEDIES

If you believe that the processing of your personal data violates your rights, you may file a complaint with the **National Authority for Data Protection and Freedom of Information (NAIH)**:

Address: 1055 Budapest, Falk Miksa utca 9-11.

Website: www.naih.hu

Email: ugyfelszolgalat@naih.hu

Phone: +36 (1) 391-1400

IX. MODIFICATIONS TO THIS PRIVACY POLICY

We reserve the right to modify this Policy at any time. The updated version will always be available on our website.

Budapest, March 12, 2025

MS International Kft.
Data Controller