

Steelflex Kft. – Privacy Policy

for the Steelflex Kft. website, business communication, newsletter and social media presence

Version: 1.0 | Effective date: 20 July 2026

Data Controller details	Name
Company Name	Steelflex Kft.
Head Office	6000 Kecskemét, Kadafalva-Heliport 11751/1.
Company Registration Number	03-09-103103
Tax Number	11037338-2-03
Website	https://steelflex.hu
Email	info@steelflex.hu
Telephone	+36 76 999 040
Representative	the current CEO of the company

1. Purpose and Scope of the Notice

Steelflex Kft. (hereinafter: *Controller*) respects the privacy and personal data of natural persons and processes such data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Act CXII of 2011 on informational selfdetermination, and all applicable Hungarian legislation.

This notice applies to visitors of the steelflex.hu website, natural persons who contact or enter into a contractual relationship with the Controller, business contact persons, newsletter subscribers, and individuals interacting with the Controller's social media pages.

2. Principles of Data Processing

The Controller processes personal data lawfully, fairly and transparently, for specified purposes and only to the extent necessary. It ensures data accuracy, appropriate protection, and retains personal data only for the necessary or legally required period.

3. Individual Processing Activities

3.1 Contact and General Enquiries

Processed data: name, email address, phone number, name of represented organisation, message content, and any additional data provided during communication.

Purpose: responding to enquiries, maintaining communication, and providing requested information.

Legal basis:

- If the data subject requests an offer or initiates contract conclusion: GDPR Article 6(1)(b) – steps prior to entering into a contract.
- For other general enquiries: GDPR Article 6(1)(f) – legitimate interest in responding to incoming enquiries and ensuring business communication.

Retention:

- Unsuccessful general enquiries: 1 year from the last substantive communication.
- Offer requests or contractrelated enquiries: retained according to the retention period of related documents.

Providing data is voluntary, but without the necessary information the Controller cannot process the enquiry.

3.2 Offers, Contract Performance and Business Communication

Processed data: name, job title, business contact details, organisation data, information included in offers, orders and business correspondence.

Purpose: preparing offers, establishing and performing contracts, managing orders, delivery and quality coordination, communication, and asserting or defending legal claims.

Legal basis:

- Natural person contracting party: GDPR Article 6(1)(b).
- Contact person of a legal entity: GDPR Article 6(1)(f) – legitimate interest in maintaining business relations, performing contracts and enforcing related claims.

Retention: until the end of the general limitation period following contract termination or last performance, typically 5 years; in case of ongoing legal disputes, until their final resolution.

3.3 Invoicing and Accounting Records

Processed data: personal, contact and financial data appearing on invoices and accounting documents.

Purpose & legal basis: compliance with invoicing and accounting obligations under GDPR Article 6(1)(c).

Retention: 8 years pursuant to Act C of 2000 on Accounting.

3.4 Newsletter and Direct Marketing Communications

Processed data: name, email address, industry, job title, date of subscription and consent, IP address.

Purpose: sending professional news, articles, product and service information, developments and updates.

Legal basis: voluntary consent under GDPR Article 6(1)(a) and relevant electronic marketing regulations.

Retention: until consent is withdrawn or the user unsubscribes. The Controller may retain the fact of unsubscription and minimal related data until the end of the limitation period to prevent further sending and to demonstrate prior consent.

Consent may be withdrawn at any time without justification via the unsubscribe link in newsletters or by emailing info@steelflex.hu. Withdrawal does not affect the lawfulness of prior processing.

3.5 Website Operation, Log Data and Security

Processed data: IP address, access time, requested page or file, HTTP response code, browser and operating system technical data, and log data related to security events.

Purpose: ensuring website availability, proper operation and IT security, detecting errors and preventing misuse.

Legal basis: GDPR Article 6(1)(f) – legitimate interest in secure and reliable operation of IT systems.

Retention: 30 days.

3.6 Analytics and Marketing Measurements

The Controller uses nonessential analytics or marketing cookies and related technologies only after obtaining prior consent. Legal basis: GDPR Article 6(1)(a). Consent may be modified or withdrawn at any time in cookie settings.

Specific providers, cookies, purposes and expiry periods are listed in Section 5. Google Tag Manager is a tag management tool; consentbased tags controlled by it are only loaded after valid consent.

3.7 Social Media

The Controller operates Facebook, LinkedIn and YouTube pages. When a user follows the page, comments, sends messages or interacts otherwise, the Controller processes publicly available profile data and interaction content for communication and managing social media presence. Legal basis: userinitiated communication and GDPR Article 6(1)(f) – legitimate interest.

Platforms may process data independently for their own purposes. For certain page statistics, the Controller and the platform may act as joint controllers. Further processing by platforms is described in their own privacy notices.

3.8 Prize Draws

The Controller may organise prize draws. Each draw has its own rules and privacy notice specifying purpose, legal basis, processed data, retention, publication of winners and prize delivery. These are published when the draw is announced.

4. Processors and Recipients

The Controller uses only partners providing adequate guarantees for data protection. Processors act based on the Controller's instructions and contractual terms.

- **Nexum Magyarország Kft.** – hosting, server operation, backups
- **Sendinblue SAS (Brevo)** – newsletter sending, subscriber database management
- **Google Ireland Ltd.** – Google Tag Manager; Google Analytics and YouTube if used
- **Meta Platforms Ireland Ltd.** – Meta Pixel, ad conversion measurement, audience creation, ad optimisation
- **LinkedIn Ireland Unlimited Company** – LinkedIn page and page statistics

Depending on the service, these providers may act as processors, independent controllers or joint controllers.

5. Cookies and Similar Technologies

Essential cookies are required for website operation. Analytics and marketing cookies may only be placed with prior consent. Refusal of consent must not restrict basic website use.

Cookie / Provider	Type	Purpose	Duration	Legal Basis
cookieyes-consent	necessary	records cookie consent settings (CookieYes)	1 year	legitimate interest / applicable law (GDPR)

pll_language	necessary	stores selected language (Polylang)	1 year	legitimate interest / applicable law (GDPR)
_ga	analytics	Google Analytics – distinguishing unique visitors, statistics	2 years	consent
_ga_TQRQE5F2FF	analytics	GA4 – session/property specific state	2 years	consent
_gcl_au	marketing	Google Ads Conversion Linker – linking ad conversions	90 days	consent
sib_cuid (Brevo)	marketing / newsletter	unique visitor ID for newsletter subscription and marketing automation	6 months	consent
_fbp (Meta Pixel)	marketing	measuring visits and ad conversions, audience creation, ad optimisation	typically 3 months	consent

6. Data Transfers Outside the EEA

Some providers may involve entities outside the EEA, particularly in the United States. Transfers occur only with appropriate safeguards under GDPR Chapter V, such as adequacy decisions (including the EU–US Data Privacy Framework for certified organisations) or Standard Contractual Clauses (SCCs), with supplementary measures if necessary.

Information on specific transfers and safeguards may be requested at info@steelflex.hu.

7. Data Security

The Controller protects personal data with technical and organisational measures proportionate to risks, preventing unauthorised access, alteration, transmission, disclosure, deletion, damage or destruction. Measures include access control, permission reviews, system updates, backups, encrypted data transmission and incident management.

8. Automated Decision Making and Profiling

The Controller does not make decisions based solely on automated processing that produce legal effects or similarly significant impacts on the data subject. Social and

analytics platforms may perform profiling within their own operations; details are provided in their privacy notices.

9. Rights of Data Subjects

Subject to applicable conditions, the data subject may:

- request information and access to their personal data;
- request rectification of inaccurate or incomplete data;
- request erasure or restriction of processing;
- object to processing based on legitimate interest; objection to direct marketing is absolute;
- withdraw consent at any time without affecting prior processing;
- request data portability or transfer to another controller;
- lodge a complaint with the supervisory authority or seek judicial remedy.

Requests may be sent to info@steelflex.hu or to the Controller's registered office. The Controller responds without undue delay, within one month of receipt. This period may be extended by two months depending on complexity and volume; the Controller informs the data subject within one month. If identity is uncertain, additional information may be requested.

10. Complaints and Judicial Remedies

If the data subject believes their personal data is processed unlawfully, they may lodge a complaint with the Hungarian supervisory authority:

National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa utca 9–11 Postal address: 1363 Budapest, Pf. 9
Phone: +36 1 391 1400 Email: ugyfelszolgalat@naih.hu Website: <https://www.naih.hu>

The data subject may also bring the matter before a court, choosing the competent court based on their residence or place of stay.

11. Modification of the Notice

The Controller may amend this notice due to changes in legislation, authority practice, service providers or processing activities. The current version is published on steelflex.hu. In case of significant changes, the Controller informs data subjects appropriately.