



# Privacy Notice

## Website visits and cookie management

Effective from 2026.03.12.

Version number: 1.3

## 1. Introduction

**Nelson Flottalizing Kft.**, a member of the Autowallis Group, as the data controller (hereinafter referred to as the "**Controller**") is committed to the safeguarding and protecting the rights of its customers and all persons who have contact with it (hereinafter referred to as the "**Data Subject**") in relation to personal data.

The Controller provides information to the Data Subjects on the details of the processing of personal data in the context of website visits and cookie processing by issuing this Privacy Notice (hereinafter: the "**Notice**").

Please note that the information in this Notice only applies to data relating to natural persons.

### 1.1. Data controller and contact details

Name: Nelson Flottalizing Kft.  
Registered office: 1097 Budapest, Könyves Kálmán körút 34.  
Registration number: 01-09-378396

Phone number +36 1 444 7777

E-mail address: [adatvedelem@wigomobility.com](mailto:adatvedelem@wigomobility.com)

### 1.2 Data Protection Officer and contact details

The Controller, together with other companies belonging to the AutoWallis group, employs a joint data protection officer under the authorisation of Article 37(2) of the GDPR

E-mail address: [adatvedelem@wigomobility.com](mailto:adatvedelem@wigomobility.com)

### 1.3. Purpose of the Notice

The purpose of this Notice is to answer the following questions.

- what personal information we collect about you when you visit our website,
- for what purpose and on what legal basis we do this,
- how long the data is stored,
- if we transfer them to someone else,
- what rights and remedies you have in relation to the processing.

### 1.4. General rules on data processing

#### Source of data

Personal data is typically obtained directly from the data subject. If we obtain your personal data through other means, we will inform you of the details of this in the specific section.

#### Transfers to third countries

As a matter of general business practice, we also use service providers reside outside the EEA. Due to the third country headquarters, personal data processed in these services could in some cases be transferred outside the EEA. For example, in the case of Microsoft's office software or our Facebook page, to the USA. We monitor the adequacy of these services and services from a data protection perspective on an ongoing basis. For example, whether these service providers are registered under the EU-US data protection framework. In order to comply with our own data protection policies and procedures, we only engage with service providers that can demonstrate a proven commitment to data protection compliance.

## Profiling or automatic decision-making

We do not typically use profiling or automated decision-making in our data processing. If we do, we will inform you of the details of this in the specific section.

## Data processors

Our subcontractors who may have access to personal data are contractually guaranteed to comply with our instructions on data processing and the applicable data protection standards.

## 2. Description of each processing operation

The following are the details of each processing operation:

2.2. Website operation

2.3. Website cookie management (analytical cookies)

2.3. Website cookie management (functional cookies)

2.4. Website cookie management (marketing cookies)

### 2.1. What we call cookies

A cookie is a small data packet that websites capture on their visitors' computers or mobile devices. Cookies are widely used to improve the functioning of websites, to provide a personalised online experience or otherwise enhance the user experience, or to provide website owners with various information. Cookies do not identify the user; they only recognise the visitor's computer.

We may place cookies on visitors' computers without their consent if they are strictly necessary for the website to function properly. For all other types of cookies, we ask for your consent.

During your visit to our website, we collect your personal data through cookies, server logs and other technologies, including in particular your IP address, user agent data, browser type, time of your visit and possible preferences.

The cookie is valid and active for the expiry date set when you place it. So-called "session" cookies are only valid and active as long as you keep the website open on your device, and will expire immediately after you close the website. The validity period of persistent cookies is defined in days, months or years. After the expiry of the validity of a persistent cookie, your browser will automatically delete the cookie when you visit the site again. You can also delete permanent cookies from your browser within the validity period.

The website also contains third-party cookies, which can only be placed on the visitor's computer with the visitor's consent.

#### 2.1.1 Cookies currently used on the website

You can view and set the cookies used on our website at any time in detail on the "cookie wall" of the site.

## 2.2. Website operation

### Purpose and legal basis for processing

We process the data for the purpose of website operation, website security. Legal basis for processing - GDPR Article 6 (1) (f) - legitimate interest of the Data Controller in the secure operation of the website.

### Categories of the data processed

- IP address
- Browser fingerprint

- Server time
- URL

#### Retention time

26 months

#### Data processor

- Server provider

### 2.3. Website cookie management (analytical cookies)

#### Purpose and legal basis for processing

We process the data for the purpose of statistical analysis of website visits. Legal basis for processing - Article 6(1)(a) GDPR: Consent of the Data Subject

#### Categories of the data processed

- Analytical cookie setting based on:
  - previous pages visited
  - page clicks and time on page
  - relevant data according to previous browsing history

#### Retention time

By default, or until manual deletion.

#### Data processors

- Server provider
- Analytical cookie provider

#### Recipients of data transfers

AutoWallis Nyrt.

### 2.4. Website cookie management (functional cookies)

#### Purpose and legal basis for processing

We process data to enhance your experience on our website. The legal basis for processing is GDPR Article 6(1)(f) - legitimate interest of the controller in providing the web experience.

#### Categories of the data processed

- Data content according to the settings of the performance cookie:
- User's preferences related to the website.

#### Retention time

By default or until manual deletion by the user.

## Data processor

- Server provider

## Recipients of data transfers

AutoWallis Nyrt.

## 2.5. Website cookie management (marketing cookies)

### Purpose and legal basis for processing

Monitoring website visitor behaviour for marketing purposes, personalised marketing profiling. Legal basis for processing - Article 6 (1) (a) GDPR, consent of the Data Subject.

Another purpose of data processing is to measure the effectiveness of our advertisements and to improve our services. For this purpose, we may link website browsing data with the status of processes in our internal customer management system (CRM), for example whether a request for a quotation or a registration was successfully completed.

### Categories of the data processed

- Marketing cookies based on your preferences:
- Previous pages visited
- Social media activity
- Range of products purchased
- Fields of interest
- Other marketing relevant data
- Conclusions drawn from the data and the resulting profile
- For the purposes of measurement, we link the browser's technical identifier, the source and device used to access the website, and the result of the customer process. No direct personal data (such as name or email address) is transferred to this external statistical database.

### Source of personal data

- Contact
- Marketing cookie provider

### Retention time

By default, or until manual deletion

### Data processors

- Server provider
- Marketing cookie provider
- The marketing agency providing web analytics

### Recipients of data transfers

AutoWallis Nyrt.

### Profiling or automatic decision-making

Based on the type of marketing cookie and its settings, a marketing profile can be created based on website

visits, which can be used to deliver targeted advertising during marketing activities.

In case of accepting marketing and statistical cookies, we use this data to create statistics and profiles in order to optimize our advertisements. However, in doing so we do not make any automated decisions that would result in any significant legal or other effects on you.

### 3. Rights of data subjects

As a data subject, you have the right to request information about the processing of your personal data and access to such data. You also have the right to request the rectification, erasure or withdrawal of your personal data, except for mandatory processing. Furthermore, you may exercise your right to data portability by contacting us at the above contact details (1.1. and 1.2.). You may object to processing based on legitimate interest at any time.

Upon receipt of your request, we will provide you with the information you require without delay, but no later than one month after receipt of the request. This service is provided free of charge unless the request is deemed to be unfounded or excessive.

#### Right to be informed

We provide information about the details of data processing in a concise, transparent, understandable and easily accessible form, in clear and plain language. This document has been written for that purpose.

#### The right of access

You have the right to receive feedback from us on whether your personal data is being processed. If you provide us with appropriate proof of your identity and we process your personal data, you have the right to be informed of the details of the processing and to receive a copy of your personal data.

#### Right of rectification:

Any data subject may request the rectification of personal data that we hold about him or her that is inaccurate for any reason, or the completion of incomplete data. We may ask for an additional information to ensure accuracy.

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

You are entitled to request the erasure of your personal data if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected;
- if you withdraw your consent and there is no other legal basis for the processing;
- if you object to the processing and there are no other legitimate grounds for the processing which override the objection
- the unlawful processing of personal data has been established;
- we are under any other legal obligation to delete it.

#### Right to restriction of processing:

You can request the restriction of the processing of your personal data in the cases set out in the GDPR. For example, for the time it takes to verify the disputed accuracy of personal data or if you request the retention of data that would otherwise be deleted in order to pursue a legal claim.

If the processing is subject to restriction, the personal data will only be stored and processed beyond storage in exceptional cases. We will inform you in advance of the lifting of the restriction on processing.

## Right to portability

As a data subject, you have the right to receive your personal data from us in a structured, commonly used, machine-readable format and to transfer this data to another data controller. Such a request will typically be in MS Word or Excel format. You have the right to data portability if the processing is automated and the legal basis for the processing is your consent or the performance of a contract.

## Right to object:

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interests of the Controller. As Data Controller, we may only continue to process your data where there are compelling legitimate grounds for doing so or where it is necessary to pursue legal claims.

## Right to withdraw consent:

In cases where we process your data on the basis of your consent, you have the right to withdraw your consent at any time, in which case we will cease processing. Withdrawal of consent does not affect the lawfulness of the processing that took place before consent was withdrawn.

## 4. Procedural rules, legal remedies

If you exercise your right as a data subject under the previous chapter, we will inform you of the action we have taken or, if not taken, of the reasons for not taking action without undue delay and in any event within one month of receipt of the request. If necessary and taking into account the complexity of the request and the number of requests, this time limit may be extended by two months. We will inform you of the extension, stating the reasons for the delay, within one month of receipt of the request.

If you submit your request to us in any form, we will respond by e-mail unless you specifically request otherwise.

We will inform all recipients to whom or with whom we have disclosed your personal data of any rectification, erasure or restriction of processing we have carried out, unless this is impossible or involves a disproportionate effort. We will inform you of these recipients upon request.

As a data controller, we handle, record, process and transmit the personal data of Data Subjects in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation ("GDPR"), Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information, and other legal provisions and recommendations of public authorities on data protection.

If you believe that your right to information self-determination has been violated, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information at.

National Authority for Data Protection and Freedom of Information

Postal address: 1363 Budapest, PO Box 9; website: <http://naih.hu>

In addition, if you believe that we are processing your personal data in breach of the legal requirements for the processing of personal data, you may also bring a lawsuit before the competent court in your place of residence or domicile (<https://birosag.hu/ugyfeleknek/birosagok/torvenyszekek>).