

Website Privacy and Cookie Notice

Processing of customer, prospective customer and visitor data obtained through the www.kilikya.hu website

Version	3.0
Effective from	29 July 2026
Privacy contact	info@kilikya.hu

Scope of this Notice

This document applies exclusively to personal data processed in connection with visits to the Kilikya Transz Kft. website, website contact and quotation requests, and the customer relationship arising from them. It does not govern employee-related processing, CCTV processing or other processing carried out at business premises.

1. Details of the Data Controller

Data	Details
Name of Data Controller	Kilikya Transz Kft.
Registered office	2330 Dunaharaszti, Raktár utca 4., Hungary
Company registration number	13-09-222019
Tax number	26097314-2-13
Website	www.kilikya.hu
E-mail	info@kilikya.hu
Telephone	+36 70 426 8282

Privacy-related questions, data subject requests or complaints may be sent to the e-mail address above or by post to the Data Controller's registered office.

2. Purpose and Personal Scope of this Notice

This Notice explains what personal data Kilikya Transz Kft. collects and stores through the website, for what purposes and on what legal bases it uses such data, how long it retains the data, who may have access to it, and how data subjects may exercise their rights.

Data subjects include, in particular:

- a visitor to the website;
- a person completing the contact or quotation request form;
- a person making an enquiry by e-mail or telephone;
- a customer, or the natural-person representative or contact person of a customer or business partner;
- a sender, recipient or other natural person whose data are provided by the person making the enquiry in connection with a quotation request or preparation of the service.

Providing another person's data

Anyone who provides another person's data to Kilikya Transz Kft. must ensure that they have an appropriate legal basis for doing so and that the data subject is able to become acquainted with this Notice.

3. Data Processing Principles

The Data Controller processes personal data lawfully, fairly and transparently, for specified purposes, limited to the data necessary, accurately, only for as long as necessary and with appropriate security. Personal data are not sold or rented.

4. Data Processed Through the Website

Purpose of processing	Data processed	Legal basis	Retention period
Operation, security and troubleshooting of the website	IP address, date and time, page visited, browser and device data, technical logs, error codes.	Article 6(1)(f) GDPR: legitimate interest in secure and reliable operation.	As a general rule, no longer than 90 days; in the event of a security incident, until the matter is closed.
Contact and responding to enquiries	Name, company name, e-mail, telephone number, content of the message and any other data voluntarily provided that are necessary for handling the matter.	Article 6(1)(b) GDPR: steps prior to entering into a contract; for B2B contact persons, Article 6(1)(f) legitimate interest.	2 years from closure of the matter, unless a contract is concluded or a legal claim justifies longer retention.
Preparing quotations and preparing the service	Contact details; sender and recipient; loading and unloading location; nature, quantity and weight of cargo; route, date/time and other transport or warehousing information.	Article 6(1)(b) GDPR; for a business partner's contact person, Article 6(1)(f).	2 years from expiry of the quotation or the end of negotiations; for an accepted quotation, according to the contractual retention rules.
Customer relationship and performance of the contract	Name, job title, company name, contact details, order and contractual communications, data necessary for performance of the service.	Article 6(1)(b) GDPR for natural-person customers; Article 6(1)(f) for company contact persons; Article 6(1)(c) where required by law.	5 years from termination of the contract; 8 years for data connected with accounting documents.
Handling complaints, loss/damage events and legal claims	Contact details, description of the complaint or event, related correspondence, evidence and case-handling data.	Article 6(1)(c) GDPR legal obligation and/or Article 6(1)(f) for the establishment, exercise and defence of legal claims.	For the period necessary from closure of the matter or expiry of the claim; for consumer complaints, for the period prescribed by law.
Evidence of consent and cookie settings	Consent identifier, selected categories, timestamp, technical device data.	Article 6(1)(c) and (f) GDPR: demonstrating consent and respecting the selected settings.	Up to 5 years from withdrawal or expiry of consent, to the extent necessary for evidentiary purposes.

5. Nature of Providing Data

Contacting us and requesting a quotation are voluntary. However, without the data marked as mandatory, the Data Controller cannot respond to the enquiry, prepare the quotation or prepare the requested service. Please do not include in your message any special-category or sensitive personal data that are not necessary for the purpose.

The contact form requires confirmation that the Privacy Notice has been read; the legal basis for responding to an enquiry is not forced data-protection consent. Separate marketing consent may only be requested through a separate, unticked choice.

6. Cookies and Similar Technologies

A cookie is a small data file stored by the browser on the visitor's device. The website may also use local storage, pixels or other technical identifiers. The technologies and providers actually used, their expiry periods and data transfers are listed in the website's current Cookie Settings interface.

Category	Purpose and legal basis	Activation
Strictly necessary	Secure operation of the website, maintaining the session, load balancing and recording the cookie choice. Technical provision of the service requested by the user and/or legitimate interest.	May operate automatically when the website is used; cannot be disabled in the consent panel.
Functional / preference	Remembering language and other convenience settings. If not essential, the legal basis is consent.	Only after prior consent.
Statistics / analytics	Measuring and improving website use, where possible using pseudonymised or aggregated data. Legal basis: consent.	Blocked by default; activated only after active acceptance.
Marketing / external content	Advertising measurement, social media, maps, videos or other external services. Legal basis: consent.	Blocked by default; activated only after active acceptance.

- Non-essential cookies must not be activated before consent.
- The “Accept” and “Reject” choices must be equally easy to access.
- The visitor can change the choice separately for each category.
- Consent can be withdrawn at any time via the Cookie Settings interface available in the website footer.
- Cookies can also be deleted or restricted directly in the browser, which may affect the operation of certain functions.

Important operational requirement

The published Notice and the cookie banner are compliant only if the website actually blocks optional analytics, marketing and external content until the visitor gives consent, and the Cookie Settings panel lists the actual providers and retention/expiry periods.

7. Recipients and Processors

Personal data may be accessed only by employees and other recipients who need access to handle the relevant matter. The Data Controller may use the following categories of recipients:

- hosting, domain, web development and IT operations providers;
- e-mail and telecommunications providers;

- cookie consent management, web analytics or embedded-content providers, solely in accordance with the visitor's choice;
- a carrier, freight forwarder, warehouse, customs representative or other partner involved in preparing a quotation or providing the ordered logistics service;
- Kilikya Transz Kft.'s Turkish subsidiary where this is necessary for preparing a quotation, managing the customer relationship or providing a service involving Türkiye;
- an accountant, insurer, lawyer or other professional adviser where justified by the nature of the matter;
- a court, authority or other body legally entitled to request data.

A processor may act only on the Data Controller's documented instructions and subject to appropriate confidentiality and security obligations. Certain recipients - such as authorities, insurers or partners participating in performance under their own responsibility - may qualify as independent controllers.

8. International Data Transfers

Personal data connected with the website are primarily processed within the European Economic Area.

For the purposes of preparing quotations, managing the customer relationship, and preparing and performing services involving Türkiye, the Data Controller may transfer necessary personal data to its Turkish subsidiary or make such data accessible to it. Because the subsidiary is a separate legal entity operating in Türkiye, such transfers are governed by Chapter V of the GDPR.

The European Commission has not adopted an adequacy decision in respect of Türkiye. Transfers therefore take place subject to appropriate safeguards, as a general rule on the basis of the standard contractual clauses adopted by the European Commission, a documented risk assessment and, where necessary, supplementary technical, organisational or contractual measures. A copy of the safeguards applied may be requested at info@kilikya.hu.

9. Data Security

The Data Controller applies technical and organisational measures proportionate to the risks, including, in particular, access restrictions, individual access rights, password and multi-factor protection, encrypted data transmission, backups, logging, updates, protection against malicious software, and confidentiality obligations for employees.

In the event of a personal data breach, the Data Controller assesses the risk, takes the necessary containment measures, documents the event and, where the statutory conditions are met, notifies the supervisory authority and the affected data subjects.

10. Automated Decision-Making and Profiling

Kilikya Transz Kft. does not use personal data obtained through the website for solely automated decision-making that produces legal effects concerning the data subject or similarly significantly affects them. Optional analytics or marketing tools may perform limited usage segmentation only on the basis of prior consent.

11. Rights of Data Subjects

Right	Content
Access	You may request information as to whether we process your personal data and may request a copy of the data.
Rectification	You may request correction of inaccurate data and completion of incomplete data.

Right	Content
Erasure	You may request erasure of your data if the purpose or legal basis of the processing has ceased to exist or another condition for erasure applies. Statutory retention obligations or legal claims may restrict erasure.
Restriction	You may request restriction of processing, for example while the accuracy of the data is being verified or an objection is being assessed.
Data portability	For automated processing based on consent or a contract, you may request the data you provided in a machine-readable format.
Objection	You may object, on grounds relating to your particular situation, to processing based on legitimate interests.
Withdrawal of consent	You may withdraw consent at any time as easily as it was given. This does not affect the lawfulness of processing carried out before withdrawal.

Requests may be submitted to info@kilikya.hu or by post. The Data Controller responds without undue delay and, as a general rule, within one month. This period may be extended by a further two months due to the complexity or number of requests; information about the extension will be provided within the first month. Exercising rights is generally free of charge.

12. Remedies

The data subject may first contact the Data Controller at info@kilikya.hu. In addition, a complaint may be lodged with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), and judicial remedies may also be sought.

NAIH contact details	Details
Address	1055 Budapest, Falk Miksa utca 9-11.
Postal address	1363 Budapest, Pf. 9.
E-mail	ugyfelszolgalat@naih.hu
Telephone	+36 30 683 5969; +36 30 549 6838; +36 1 391 1400
Website	www.naih.hu

13. Amendments to this Notice

The Data Controller updates this Notice if legislation changes, the website or the service providers used change, or a new processing purpose is introduced. The currently effective version is available at www.kilikya.hu. In the event of a material change, the Data Controller may also provide separate information appropriate to the circumstances.

To be checked before publication

The web developer must verify the actual fields of the contact and quotation request forms, the hosting and e-mail provider, all cookies, analytics code, maps, videos, social-media elements and other external services. The Cookie Settings panel must display their actual names, purposes and expiry periods.

Annex 1 - Request to Exercise Data Subject Rights

This request is intended for exercising data subject rights in relation to personal data processed by the Data Controller.

1. Details of the Data Controller

Name of Data Controller:	
E-mail address:	
Postal address:	
Website / social media contact:	

2. Details of the Applicant

Name:	
E-mail address:	
Telephone number:	
Postal address:	
Other data necessary for identification, if relevant:	
Attached document, if any:	

3. Subject of the Request

I request that the Data Controller enable me to exercise the following data subject right:

- ☐ Right of access
- ☐ Right to rectification
- ☐ Right to erasure
- ☐ Right to restriction of processing
- ☐ Right to data portability
- ☐ Right to object
- ☐ Withdrawal of consent
- ☐ Exercise of rights related to automated decision-making
- ☐ Other:

4. Detailed Description of the Request

5. Requested Method of Sending the Response

- ☐ By e-mail
- ☐ By post
- ☐ Other method:

Address / contact detail to be used for sending the response:	
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6. Information on Handling the Request

The Data Controller informs the applicant of the action taken on the request within 1 month of receipt of the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further 2 months. The Data Controller informs the applicant of any extension of the period and the reasons for the delay.

If the applicant wishes to lodge a complaint concerning the processing of their personal data, the complaint may be addressed to the Hungarian National Authority for Data Protection and Freedom of Information.

Date:

Applicant's signature: