

Privacy Policy

Details of the Data Controller

Name of the Data Controller:

Gulyás Marcell Sándor, sole proprietor

Registered address:

2030 Érd, Felsővölgyi út 73., Hungary

Registration number:

59802361

Tax number:

90563214-1-33

E-mail:

info@thirstycow.hu

Webshops operated by the Data Controller:

<https://thirstycow.hu>

– Hungarian-language webshop

<https://www.thirstycowstudio.com>

– English-language international webshop

This Privacy Policy applies to both webshops and to the related data processing activities of the Data Controller described herein.

Purpose of the Privacy Policy

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The purpose of this Privacy Policy is to provide customers, prospective customers, clients and visitors of the websites with transparent and easily understandable information regarding the processing of their personal data.

The Data Controller processes personal data in particular for the operation of the webshops, receiving and fulfilling orders, processing payments, invoicing, delivery of products, communication with customers, handling requests for quotations, complaint handling and, where the appropriate consent of the data subject has been obtained, statistical and marketing measurement purposes.

When processing personal data, the Data Controller acts in accordance in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), as well as the applicable Hungarian and European Union data protection legislation.

The Data Controller respects in particular the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

The Data Controller processes only personal data necessary for achieving the relevant processing purpose, retains such data only for as long as necessary and applies appropriate technical and organisational measures to protect the data.

The Data Controller reserves the right to amend this Privacy Policy, particularly where the services used, technologies applied or applicable legislation change. The current version is available in the Data Controller's webshops.

Personal, Material and Temporal Scope of the Privacy Policy

This Privacy Policy applies to the Data Controller and to natural persons whose personal data are processed by the Data Controller in connection with the use of the webshops, orders, requests for quotations, communications, payments, delivery, complaint handling or any other activity described in this Privacy Policy.

The material scope of this Privacy Policy covers the processing of personal data carried out by the Data Controller in connection with the operation of <https://thirstycow.hu> and <https://www.thirstycowstudio.com> and the related commercial and customer service activities.

This Privacy Policy shall remain effective from the date of publication until withdrawn or amended.

The Data Controller may amend this Privacy Policy particularly in the event of changes to legislation, technologies, service providers or data processing activities. The current version is available in the webshops.

Key Definitions

The terms used in this Privacy Policy shall primarily be interpreted in accordance with Regulation (EU) 2016/679 (GDPR).

Data subject:

an identified or identifiable natural person to whom personal data relate.

Personal data:

any information relating to an identified or identifiable natural person.

Processing:

any operation or set of operations performed on personal data or sets of personal data, including in particular collection, recording, organisation, storage, alteration, retrieval, use, disclosure, restriction or erasure.

Data Controller:

the natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Processor:

a natural or legal person which processes personal data on behalf of the Data Controller.

Recipient:

a natural or legal person to whom personal data are disclosed.

Consent:

any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject signifies agreement to the processing of personal data relating to him or her.

Personal data breach:

a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data processed.

Lawful Processing by the Data Controller

The Data Controller processes personal data only where an appropriate legal basis exists.

Depending on the purpose of processing, the legal basis may in particular be:

- the consent of the data subject – Article 6(1)(a) GDPR;
- performance of a contract to which the data subject is party or taking steps at the request of the data subject prior to entering into a contract – Article 6(1)(b) GDPR;
- compliance with a legal obligation to which the Data Controller is subject – Article 6(1)(c) GDPR;
- the legitimate interests pursued by the Data Controller or by a third party – Article 6(1)(f) GDPR, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject.

Where processing is based on consent, the data subject may withdraw his or her consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

The Data Controller shall not use personal data in a manner incompatible with the purposes specified in this Privacy Policy.

Processing of Personal Data by the Data Controller

1. Orders and performance of contracts

Purpose of processing:

processing orders submitted through the webshop, identifying the customer, communicating with the customer, performing the contract, producing the product, handing it over and arranging delivery.

Personal data processed may include:

name, billing address, delivery address, e-mail address, telephone number, product ordered and its characteristics, order details, selected payment and delivery method and any information provided by the customer that is necessary for producing a customised product.

Legal basis:

Article 6(1)(b) GDPR – performance of a contract.

Provision of the necessary data is required for performance of the contract. Without such data, the Data Controller may not be able to fulfil the order.

2. Contact and requests for quotations

Purpose of processing:

responding to enquiries, discussing requirements relating to customised products and preparing quotations.

Personal data processed may include:

name, e-mail address, telephone number and any data voluntarily provided by the data subject in the message or during the quotation process.

Legal basis:

where the contact is made for the purpose of entering into a contract, Article 6(1)(b) GDPR; in other cases, Article 6(1)(f) GDPR – the legitimate interest of the Data Controller in responding to enquiries.

The Data Controller retains data relating to such communications for as long as necessary for the relevant purpose or, where a contract is concluded, for the retention period applicable to the related contractual documentation.

3. Payment

In the case of payment by advance bank transfer, the Data Controller may process banking transaction details necessary to verify receipt of payment.

For online card payments, payment is processed through Stripe. The Data Controller does not receive or store the customer's full bank card details.

Purpose of processing:

processing and verifying payment of the purchase price.

Legal basis:

Article 6(1)(b) GDPR – performance of a contract and, in relation to accounting documentation, Article 6(1)(c) GDPR – compliance with a legal obligation.

Data Processors and Other Recipients

The Data Controller uses the following service providers in the course of its activities. Depending on the specific activity performed, the relevant provider may act as a data processor, independent data controller or other recipient.

1. Webshop platform and hosting

UNAS Online Kft.

Registered office: 9400 Sopron, Kőszegi út 14., Hungary

E-mail: unas@unas.hu

Website: <https://unas.hu>

Activity:

provision of the technical platform, hosting and related IT services required for the operation of the webshops.

2. Invoicing

KBOSS.hu Kft. – [Szamlazz.hu](https://www.szamlazz.hu)

Website: <https://www.szamlazz.hu>

Activity:

provision of electronic invoicing services.

3. Online payment

Stripe

Website: <https://stripe.com>

Within the European Economic Area, several Stripe entities may be involved in the provision of Stripe services, including in particular Stripe Payments Europe, Limited, Stripe Technology Company, Limited and, depending on the service concerned, other Stripe group companies.

Activity:

online card payment and related payment services.

4. Domestic delivery

GLS General Logistics Systems Hungary Kft.

Registered office: 2351 Alsónémedi, GLS Európa utca 2., Hungary

Website: <https://gls-group.com/HU/>

Activity:
delivery of ordered products.

Personal data necessary for delivery, including in particular the customer's name, delivery address, telephone number and e-mail address, may be disclosed to GLS to the extent necessary to perform delivery.

5. International delivery

FedEx
Website: <https://www.fedex.com>

Activity:
international parcel transport and delivery.

Personal data necessary for delivery, including in particular the customer's name, delivery address, telephone number and e-mail address, may be disclosed to FedEx to the extent necessary to perform the delivery service.

6. Google services

Google Ireland Limited
Gordon House, Barrow Street, Dublin 4, Ireland

The Data Controller may use Google services, including in particular Google Analytics for measuring website traffic and usage and, subject to appropriate consent where required, Google Ads for advertising and conversion measurement purposes.

7. Meta services

Meta Platforms Ireland Limited
Merrion Road, Dublin 4, D04 X2K5, Ireland

Activity:
The Data Controller uses Meta Pixel and related Meta Business Tools for measuring the effectiveness of advertising campaigns, measuring conversions and, subject to the visitor's consent, supporting personalised advertising and remarketing activities on Facebook and Instagram.

The Meta Pixel may collect and transmit information relating to the visitor's interaction with the website, including in particular information about page views, actions performed on the website, device and browser information, IP address and other online identifiers.

The use of Meta Pixel and other non-essential marketing technologies is based on the visitor's prior consent. Where consent is required, such technologies are activated only after the visitor has provided the appropriate consent through the website's cookie settings.

Depending on the processing operation concerned, Meta Platforms Ireland Limited may act as an independent or joint data controller in accordance with the applicable Meta terms and data protection rules.

8. Accounting

The accountant engaged by the Data Controller may have access to invoicing and accounting data to the extent necessary for the fulfilment of accounting and tax obligations.

9. Authorities and other recipients authorised by law

The Data Controller may disclose personal data where required by law or pursuant to a lawful request from a competent authority, including in particular the Hungarian National Tax and Customs Administration, courts, prosecution authorities, police or other authorities authorised by law.

The Data Controller discloses only personal data necessary for providing the relevant service or fulfilling the applicable legal obligation.

Processing Related to Contracts Entered Into by the Data Controller

The Data Controller processes personal data for the purposes of entering into, performing, amending and terminating contracts with customers and clients, as well as enforcing the rights and obligations arising from such contracts.

Purpose of processing:
conclusion and performance of the contract, documentation of the order, communication, evidence of performance and, where necessary, establishment, exercise or defence of legal claims.

Personal data processed:
the data subject's name, contact details, billing and delivery information, order and contractual details and communications relating to performance of the contract.

Legal basis:
Article 6(1)(b) GDPR – performance of a contract and, where applicable, Article 6(1)(f) GDPR – the legitimate interest of the Data Controller in establishing, exercising or defending legal claims.

Personal data are processed for as long as necessary for the relevant purpose and taking into account the limitation periods applicable to potential legal claims, unless a longer retention period is required by law.

Invoices and Personal Data Included on Invoices

The Data Controller issues invoices for purchases in accordance with the applicable legislation.

Purpose of processing:
issuing invoices and fulfilling accounting and tax obligations.

Personal data processed:
name, billing address and other personal data lawfully included on invoices and related accounting documents.

Legal basis:
Article 6(1)(c) GDPR – compliance with a legal obligation to which the Data Controller is subject.

The Data Controller retains accounting documents and the personal data included therein for at least 8 years in accordance with Section 169(2) of Act C of 2000 on Accounting.

The Data Controller uses the Számlázz.hu electronic invoicing service for issuing invoices.

During the statutory retention period, the data subject's right to erasure is restricted with respect to data that must be retained in order to comply with a legal obligation.

Children's Data and Special Categories of Personal Data

The webshops operated by the Data Controller are not online services specifically intended for children, and the Data Controller does not seek to collect personal data relating to children in the ordinary course of its activities.

As a general rule, the Data Controller does not request or process special categories of personal data within the meaning of Article 9 GDPR, including in particular health data, biometric data or data revealing religious or political beliefs, sex life or sexual orientation.

Data subjects are requested not to provide such information unnecessarily when placing an order, requesting a quotation or contacting the Data Controller.

Where a customised product is ordered, text, graphics, photographs or other content voluntarily supplied by the data subject will be used solely to the extent necessary to fulfil the order.

Where the Data Controller becomes aware that personal data have been provided without an appropriate legal basis or are not necessary for the relevant purpose, such data will be deleted in accordance with applicable law.

Retention of E-mail Addresses and Telephone Numbers

The Data Controller processes e-mail addresses and telephone numbers only in connection with specific and defined processing purposes.

In connection with an order, e-mail addresses and telephone numbers are processed for the purposes of order confirmation, communication with the customer and arranging delivery.

In the case of a request for quotation or other enquiry, contact details are processed for the purposes of responding to the enquiry and carrying out any necessary follow-up communication.

The Data Controller does not use e-mail addresses or telephone numbers for newsletters or other direct electronic marketing communications without the appropriate consent of the data subject.

Contact details are retained for as long as necessary for the original purpose of processing, performance of the contract, compliance with legal obligations or establishment, exercise or defence of legal claims.

Websites of the Data Controller

The Data Controller operates the following webshops:

<https://thirstycow.hu>

<https://www.thirstycowstudio.com>

The websites may use cookies and similar technologies in order to ensure their proper operation.

Strictly necessary cookies are used to provide essential webshop functionality, including in particular session management, shopping cart functionality, security and features specifically requested by the user. Where such cookies are strictly necessary for providing a service requested by the user, prior consent is not required.

Non-essential cookies and similar technologies, including in particular analytics and marketing cookies, are used on the basis of appropriate prior consent where required by law.

The Data Controller may use Google Analytics to measure website traffic and usage, Google Ads to measure advertising performance and conversions, and Meta Pixel and related Meta Business Tools to measure advertising performance and conversions and, where applicable, to support personalised advertising and remarketing activities on Facebook and Instagram.

Where consent is required for the use of such technologies, they will only be activated after the visitor has provided the appropriate consent.

Visitors may use the cookie settings available on the website to give or refuse consent to non-essential cookies and to withdraw previously given consent.

Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

The technical operation of the websites is supported by the platform provided by UNAS Online Kft.

The current categories, providers, purposes and duration of cookies used by the websites may be viewed in the cookie settings available on the relevant website and may change according to the current technical configuration.

Social Media Pages of the Data Controller

The Data Controller is present on the following social media platforms:

Facebook:

<https://www.facebook.com/profile.php?id=61564030032893>

Instagram:

https://www.instagram.com/_thirstycow/

The purpose of processing personal data through social media is to present the Data Controller's products, services and activities, communicate with prospective and existing customers and engage in social media communication.

Where a data subject interacts with a social media page of the Data Controller, for example by following the page, liking or commenting on content or sending a message, personal data made available by that person may be processed.

The Data Controller processes such personal data only to the extent necessary for the relevant interaction and communication.

The operators of the relevant social media platforms may also process personal data as independent data controllers. Such processing is governed by the privacy terms of the relevant platform.

Complaint Handling

The Data Controller processes personal data for the purposes of handling consumer complaints.

Purpose of processing:

identifying, investigating, responding to and documenting consumer complaints and complying with applicable consumer protection legislation.

Personal data processed may include in particular:

the consumer's name, residential or electronic correspondence address, the place, time and method of submitting the complaint, a detailed description of the complaint, documents and other evidence supplied by the consumer and any other information necessary for handling the complaint.

Legal basis:

Article 6(1)(c) GDPR – compliance with a legal obligation, in particular Act CLV of 1997 on Consumer Protection.

Written complaints are answered within the deadline prescribed by applicable law.

The Data Controller retains the record of an oral complaint or the written complaint and a copy of the substantive response for three years.

Personal data processed for complaint handling are used exclusively for investigating and responding to the complaint, complying with related legal obligations and, where necessary, handling legal claims.

Security of Processing

The Data Controller applies technical and organisational measures appropriate to the level of risk in order to ensure the security of personal data.

The Data Controller seeks to prevent unauthorised access to, alteration, disclosure, publication, erasure or destruction of personal data, as well as accidental loss or damage.

Access to personal data is limited to persons and service providers who require access in order to perform the relevant task.

When selecting service providers, the Data Controller seeks to use partners that provide appropriate data security and data protection safeguards.

Due to the nature of data transmission over the internet, absolute security cannot be guaranteed in all circumstances; however, the Data Controller takes all measures that can reasonably be expected to protect personal data.

Rights of Data Subjects

Subject to the conditions set out in the GDPR, data subjects have in particular the following rights:

Right to information and access:

The data subject has the right to obtain confirmation as to whether the Data Controller processes personal data relating to him or her and, where that is the case, to access those personal data and information relating to the processing.

Right to rectification:

The data subject may request the correction of inaccurate personal data concerning him or her and the completion of incomplete personal data.

Right to erasure:

The data subject may request the erasure of personal data concerning him or her in the cases specified by the GDPR. The right to erasure does not apply, among other circumstances, where processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.

Right to restriction of processing:

The data subject may request restriction of the processing of personal data concerning him or her in the circumstances specified by the GDPR.

Right to data portability:

Where the conditions specified in the GDPR are met, the data subject has the right to receive the personal data concerning him or her which he or she has provided to the Data Controller in a structured, commonly used and machine-readable format and to request transmission of those data to another controller.

Right to object:

Where processing is based on Article 6(1)(f) GDPR, the data subject may object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her.

Withdrawal of consent:

Where processing is based on consent, the data subject may withdraw his or her consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

Requests relating to the exercise of data subject rights may be submitted to:

info@thirstycow.hu

The Data Controller shall respond to the request without undue delay and in any event within one month of receipt. In the circumstances specified by the GDPR, this period may be extended by a further two months. The Data Controller shall inform the data subject of any extension and the reasons for it within the first month.

Right to lodge a complaint

Where a data subject considers that the processing of personal data relating to him or her infringes the GDPR, he or she may lodge a complaint with the supervisory authority:

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

Address:

1055 Budapest, Falk Miksa utca 9–11., Hungary

Postal address:

1363 Budapest, P.O. Box 9., Hungary

Website:

<https://www.naih.hu>

The data subject also has the right to seek a judicial remedy in accordance with the GDPR and applicable law.

The Data Controller does not carry out decision-making based solely on automated processing which produces legal effects concerning the data subject or similarly significantly affects him or her.

Personal Data Breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data processed.

The Data Controller handles and documents personal data breaches in accordance with the GDPR.

Where a personal data breach is likely to result in a risk to the rights and freedoms of natural persons, the Data Controller shall notify the competent supervisory authority without undue delay and, where feasible, no later than 72 hours after becoming aware of the breach.

Where a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall also communicate the breach to the affected data subject without undue delay, unless the GDPR provides that such individual notification is not required.

The Data Controller maintains records of personal data breaches, including the circumstances of the breach, its effects and the remedial actions taken.

Effective date

This Privacy Policy takes effect on 14 September 2026.

Gulyás Marcell Sándor

sole proprietor

Data Controller