Privacy Policy

(https://fluffys.io.)

I. Introduction

- I.1. This Privacy Policy informs you about the data management rules that apply to the use of the https://fluffys.io website, which the Controller accepts as binding.
- I.2. By using and or registering to this website or our newsletter, you accept the terms and conditions of this Privacy Policy.
- I.3. The Controller reserves the right to change the content of this Policy at any time. The changes will come into effect upon publication on the website. All data subjects will be informed of any changes comes affective to the Privacy Policy.
- I.4. The Controller shall process the personal data of the Data Subjects only to the extent and for the duration strictly necessary for the purposes for which the processing is carried out, in accordance with the provisions of this Privacy Policy and in compliance with the applicable laws, in particular Regulation 2016/679 of the European Parliament and of the Council on data protection ("GDPR").

II. Controller

2.1. Controller:
Name:Hyakutake Bt
registered office: 9012 Győr, Forráskút utca 35
Phone: +36205995002
E-mail: hello@fluffys.io
company registration number: 08 06 015180
tax number: HU28797663

2.2.. The Controller attaches great importance to the protection of the personal data of natural persons, and to this end it handles them confidentially and in accordance with the legal requirements, and does its utmost to protect them.

III. Hosting Provider

- 2.3. Fluffys utilizes Microsoft Azure, a leading cloud computing platform, to host and manage our website and services. Azure provides robust and scalable cloud infrastructure, ensuring that our platform remains reliable, secure, and accessible.
- 2.4. Microsoft Azure offers a range of services, including virtual machines, databases, storage solutions, and content delivery networks, all of which are integral to the operation and performance of Fluffys.
- 2.5. Microsoft Azure implements advanced security features to protect data and applications hosted on its platform. These include encryption, secure access controls, threat detection, and regular security updates.
- 2.6. Azure complies with a variety of industry standards and regulations, including GDPR, ISO 27001, and SOC 2. These certifications help ensure that your data is handled in accordance with stringent security and privacy standards.
- 2.7. Azure provides robust backup solutions to ensure that data is regularly backed up and can be restored in the event of data loss or system failure.

- 2.8. Your data, including personal and transactional information, is stored on Microsoft Azure's secure servers. Azure's data centers are designed to offer high availability and redundancy.
- 2.9. Access to data hosted on Azure is restricted to authorized personnel only. Azure's access management tools help ensure that data is protected from unauthorized access.

III. Definition

- 1. "personal data": any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 2. "processing": any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 3. "restriction of processing": the marking of stored personal data with the aim of limiting their processing in the future;
- 4. "Controller": the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 5. "processor": a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 6. "'consent of the data subject": any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;;
- 7.: "personal data breach": a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 8. Website: https://fluffys.iso/.

IV. Data Processing

- 4.1. The legal basis for the processing is the Data Subject's voluntary consent, which is given voluntarily by using the Website or by registrating to our site, or by subscribing to our newsletter.
- 4.2. The Controller does not verify the personal data provided to it. The subject who provides the data is responsible for its accuracy. Any Data Subject who provides his/her e-mail address or first and last name is also responsible for its accuracy and for the fact that it is his/her personal data and that the e-mail address is used by him/her.
- 4.3. The Controller will not transfer your personal data to third countries or to any other international organizations.
- 4.4. We may share your information with third-party service providers who assist us in operating our Site and services, including payment processors (e.g., Stripe) and analytics providers. These service providers are contractually obligated to protect your information and use it only for the purposes for which we disclose it to them.
- 4.4. The Controller undertakes to ensure the confidentiality, integrity and security of the data and to take all reasonable steps to prevent the destruction, unauthorized use and unauthorized alteration of personal data.

4.5. In the table below, the Data Controller provides details of the processing of data related to the use of the Website (a), the newsletter service (b) and registered users (c).

Purpose of processing:	 a) Provision of online content and use of the Website. b) sending out newsletter c) To manage user accounts, process transactions, provide customer support, and enhance user experience.
Subjects:	 a) persons using the Website (Data Subjects) b) all Data Subjects who subscribe to the newsletter c) all Data Subjects who register on the Website by providing personal data.
Legal basis of the processing:	a) b) and c) the data Subject's consent according to (GDPR Article VI. parapgrpah (1) section b)
Scope of the processed data:	 a) date and time of visit, previously visited page, browser type, operating system, access times, cookies. b) b) e-mail address, first name, surname, c) fist name, surname, adress, company's name, tax number, password (hashed), payment information, content uploaded, transaction history.
Duration of the processing:	 a) Data retained for up to 24 months from the date of collection. b) Data retained while you are subscribed. You can unsubscribe at any time. c) Account data retained for the duration of the account's active status plus 12 months after account deletion.

V. Cookies

5.1. Cookies: . We use cookies – which is a little piece of data stored by our website - to improve your browsing experience on this website. In the table below, the Data Controller provides details of the cookies:

Neccessary	Cookie ID	Domain	Duration	Description
	m	<u>m.stripe.com</u>	1 year 1 month 4 days	_
	Host- next- auth.csrf- token	<u>fluffys.io</u>	session	_
	Secure- next- auth.callb ack-url	fluffys.io	session	_

Neccessary	Cookie ID	Domain	Duration	Description
	stripe_ mid	fluffys.io	1 year	Stripe sets this cookie to process payments.
	stripe_ sid	<u>fluffys.io</u>	1 hour	Stripe sets this cookie to process payments.
	cart	<u>fluffys.io</u>	Never Expires	Shopify sets this cookie to provide a connection with the shopping cart.
	cookieyes -consent	<u>fluffys.io</u>	1 year	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about the site visitors.
Analytics	Cookie ID	Domain	Duration	Description
	ga*	<u>fluffys.io</u>	1 year 1 month 4 days	Google Analytics sets this cookie to store and count page views.
	_ga	<u>fluffys.io</u>	1 year 1 month 4 days	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.

VI. Rights of the Data Subject in relation of the processing

- 6.1. The Data Subject has the right to request information or confirmation of the personal data processed about him or her. The Controller shall provide the Data Subject with information containing the fact and purposes of the processing.
- 6.2. The Data Subject is entitled to request the rectification of personal data concerning him or her or the completion of incomplete data. If he or she submits a request for rectification to the Controller, he or she shall be obliged to certify the accuracy of the data.
- 6.3. The Data Subject has the right to request the erasure of his or her data in connection with the processing of the data under section 4.5, in which case the Controller shall delete them without delay.
- 6.4. The Data Subject has the right to object to the processing in relation to the purposes of the processing set out in this Policy.
- 6.5. The data subject shall have the right to receive personal data concerning him or her provided to the Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another Controller.
- 6.6.. The Data Controller shall inform the Data Subject within one month of the Data Subject's request of the outcome of the processing of his/her request under the above points. Taking into account the scope and the complexity of the request, the above-mentioned time period may be extended for a further month, of which extent shall be communicated to the Data Subject by the Controller. The first fulfilment of the Data Subject's request shall be free of charge, but thereafter the Data Controller shall be entitled to recover the verifiable costs incurred in connection with the execution of the request.

6.7. In case if the Controller fails to act on the Data Subject's request, the Controller shall inform the Data Subject without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to act and of the possibility to lodge a complaint with the data protection authority and to exercise the right to judicial remedy.

6.7. If the Controller has doubts about the identity of the Data Subject and the person who wishes to exercise his or her right of access, additional data may be requested by the Controller to identify the Data Subject.

VII. Options for enforcement

- 7.1. Complaints: If the Data Subject has a complaint regarding the processing of his or her personal data, he or she may contact the Controller using one of the contact details provided in section 2.1.
- 7.2. The right to take legal action: the data subject may take the Controller to court in the event of a breach of his or her rights. Proceedings against the controller or processor must be brought before the courts of the Member State in which the controller or processor is established.
- 7.3. Complaints to the Data Protection Authority: In the event of a complaint or a breach of rights in relation to data processing, the Data Subject may refer the matter to the Data Protection Authority.

We may update this Privacy Policy from time to time. Any changes will be posted on this page with an updated effective date. Your continued use of our Site and services after any changes constitutes your acceptance of the updated Privacy Policy.

Hyakutake Bt.

Controller

Budapest, 2024.09.17.