

Privacy Policy

Privacy Policy

Meglio Horse Ltd. – Privacy Notice

Controller Information

Name: Meglio Horse Ltd.
Registered Office: 3078 Bánytereny, Szőlő út 7/A, Hungary
Tax Number: 32354164-2-12
Company Registration Number: 12-09-012631
Contact Person: Kitti Susán
Bank: Erste Bank
Account Number: 11600006-00000001-98295387
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Effective Date: August 2023

Scope of This Notice

Please carefully read this privacy notice (hereinafter: "Notice"), which explains our practices regarding the processing of your personal data in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR"). This Notice applies to individuals ("You") who use Meglio Racing services as consumers.

This Notice explains how Meglio Horse Ltd., as the data controller, collects, uses, and, in certain cases, shares your personal data with third parties. It also provides information about your rights as a data subject.

The Notice covers personal data collected both online and offline through various Meglio channels, including websites, apps, third-party social media platforms, Meglio Consumer Services, points of sale, and events. With your consent, data collected from different sources (website, offline events) and from various Meglio Racing companies or partners may be consolidated.

Failure to provide the personal data necessary for a specific purpose (e.g., mandatory fields on registration forms) may prevent Meglio from providing certain services linked to data processing.

Key Information Provided in This Notice

- Data Controller and Contact Information
- Sources and Methods of Personal Data Collection
- Categories of Personal Data Collected
- Special Categories of Personal Data
- Children's Personal Data
- Purpose and Legal Basis for Processing Personal Data
- Recipients of Personal Data
- Transfer of Data Abroad
- Who Can Access Your Personal Data at Meglio and Joint Controllers
- Your Rights
- Options for Managing Your Personal Data and Sharing
- Security Measures
- Cookies / Similar Technologies, Logs, and Web Beacons
- Changes to This Privacy Notice

1. Data Controller and Contact Information

1.1 Data Controller

For the purposes described in this Notice, **Meglio Horse Ltd.** (hereinafter: "Meglio" or "we") acts as the data controller.

Meglio has appointed a Data Protection Officer (DPO) in accordance with GDPR. The DPO's duties are supported by a contact group available across the relevant markets where the Meglio Group operates.

For questions, comments, or complaints regarding our data processing practices, please contact us at the details above.

Meglio Horse Ltd.

Email: info@meglio.hu
Address: 3078 Bánytereny, Szőlő út 7/A, Hungary

2. Sources and Methods of Personal Data Collection

2.1 Data Collected from You

- **Meglio Websites:** Websites operated by or on behalf of Meglio for consumers, including domains under our control and microsites on third-party social media platforms (e.g., Facebook).
- **Meglio Mobile Sites/Apps:** Mobile websites or applications operated by or on behalf of Meglio for smartphones, tablets, and other devices.
- **Email, SMS, and Other Electronic Communications:** Communication between you and Meglio through electronic means.
- **Meglio Consumer Services:** Communication with our consumer service team.
- **Offline Registration Forms:** Paper or digital forms collected at events, in stores, contests, promotions, or similar activities.
- **Advertising-Related Communications:** Interaction with Meglio ads, including clicks on ads displayed on third-party websites.

2.2 Data Generated by Meglio

Personal data related to your interactions with us may be recorded, e.g., purchase data from our websites.

2.3 Data from Other Sources

Data may also be collected from third-party social media platforms (e.g., Facebook, Google), market research (if responses are non-anonymous), third-party data collectors, Meglio's promotional partners, public sources, or acquired companies.

3. Categories of Personal Data Processed

Depending on your interaction with Meglio (online, offline, phone, etc.), we may collect:

- **Contact Information:** Name, address, email, phone number, or social media contact details.
- **Login Information:** Account identifiers, email, username, encrypted password, security questions and answers.
- **Demographic Data and Interests:** Birth date, age, gender, postal code, favorite products, hobbies, household or lifestyle information.

- **Device Information:** IP address, operating system, browser type and version, unique device identifiers, ad identifiers, location data, and similar technical data.
- **Usage Data:** Clicks, page visits, time spent on pages, download errors, response times, and other website usage statistics via automated methods (cookies, web beacons, analytics).
- **Survey and Feedback Data:** Voluntarily shared experiences with our products or services.
- **User-Generated Content:** Content you share on our websites, apps, or third-party social media platforms, including photos, videos, personal stories, and other media.
- **Social Media Data:** Information from third-party social media platforms that you permit to share with Meglio (e.g., basic account data, profile info, friends lists, posts).
- **Payment and Financial Information:** Bank or card details, or other payment methods, handled securely according to legal and industry standards (PCI DSS). Card details are not stored by Meglio.
- **Consumer Service Calls:** Calls may be recorded or monitored for quality and training purposes; card details are not recorded.
- 4. Special Categories of Personal Data

Meglio generally does not collect special categories of personal data, such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic/biometric data, health data, or sexual orientation. If processing special categories is required (e.g., for diversity reporting), explicit consent will be obtained. For legal compliance, fraud prevention, or crime detection, processing of special categories may occur where permitted.

5. Children’s Personal Data

Meglio does not knowingly collect personal data of children under 16. If discovered, such data will be deleted immediately. With parental consent, Meglio may collect data for children under 18 in offline contexts, using reasonable efforts to verify parental authorization.

6. Purpose and Legal Basis for Processing Personal Data

This section outlines the purposes for which we collect and use your personal data, the types of data collected for each purpose, and retention periods. Not all purposes apply to every individual.

For what purposes can we use your personal data?	Legal Basis for Data Processing	Description of Legitimate Interest
<p>Consumer Service. Your personal data is used for the purpose of providing services to consumers, such as responding to questions sent to Meglio. In this process, we need to use certain personal contact information and information related to the reason for your inquiry (e.g., order status, technical issue, product-related question/complaint, general inquiry, etc.).</p> <p>Compliance with legal obligations: Section 17/A of Act CLV of 1997 on Consumer Protection (“Consumer Protection Act”).</p> <p>On the basis of Meglio's legitimate interest, it retains all information that does not qualify as a consumer complaint.</p>	<p>Performance of Contractual Obligations</p> <p>Development of new products and improvement of the quality of our services; efficiency enhancement</p>	
<p>Contests, Marketing, and Other Promotions. Our campaigns and promotions run on websites and/or social media pages operated by us or by third parties. You can read detailed information about the contests and promotions in the official rules or informational materials of the respective contest/promotion.</p>	<p>Your voluntary, specific, informed, and explicit consent</p> <p>Performance of contractual obligations</p> <p>Retained based on Meglio’s legitimate interest</p>	<p>Development of new products and improvement of the quality of our services; efficiency enhancement</p>
<p>Social Media Platforms Operated by Third Parties. When using social media platforms operated by third parties (e.g., clicking “Like”), we use your personal data for advertisements intended for you and for communication on the social media platform. You can learn more about how the features work, as well as the profile data collected by Meglio and how to withdraw your consent, by visiting the respective third-party social media platform.</p>	<p>With your voluntary, specific, informed, and explicit consent; based on Meglio’s legitimate interest.</p>	<p>To map which products and services may interest you and provide information about them; to identify consumer types for new products or services</p>
<p>Direct Marketing Communication. We also use your personal data to provide information about products and services. This may be done via email, advertisements, SMS, phone calls, and postal mail, provided that applicable laws permit such communication.</p>	<p>Your voluntary, specific, informed, and explicit consent. You may object to such data processing at any time (for more information about this right, see Section 10).</p>	
<p>Personalization (Offline and Online). We use your personal data for the following purposes: (i) analyzing your preferences and habits, (ii) predicting your needs based on profile analysis, (iii) providing a personalized and improved user experience while using the Websites and apps, (iv) ensuring that the content of the Websites/apps is optimized for you, your computer, and your devices, (v) delivering targeted advertisements and content, and (vi) enabling you to use interactive features if you wish. For example, we may remember your login ID/email address or username so that you can quickly log in during your next visit or easily retrieve items previously added to your shopping cart. Based on this information and with your consent (where required), we provide content or promotions tailored to your specific interests related to Meglio.</p>	<p>Your voluntary, specific, informed, and explicit consent.</p> <p>Meglio’s legitimate interest</p>	<p>Development of new products and improvement of the quality of our services; efficiency enhancement; protection of our systems, networks, and employees</p>

Order Fulfillment. Your personal data is used during the processing and delivery of orders you place, for providing information about order status, verifying your address, and Necessary for the performance of the preventing fraud and abuse (including identity verification). contract between you and the Joint Data Detection of fraud and ensuring the lawful operation of Meglio
In this process, we use Personal Contact Information and Controllers Payment and Financial Information. For this purpose of data Meglio's legitimate interest processing, the Joint Data Controllers are considered the data controllers.

Internal or Market Research. In accordance with applicable laws, your personal data may also be used for other general business purposes, such as conducting internal or market research and measuring the effectiveness of advertising campaigns. We reserve the right to merge multiple Meglio accounts you may have into a single account; however, we will always seek your consent for this. Your voluntary, specific, informed, and explicit consent.

Analytics and Security. Your personal data is also used for maintaining your account and for the use and operation of our communication, IT, and security systems. Necessary for the performance of the contract between you and Meglio.

7. RECIPIENTS OF PERSONAL DATA

7.1 Third-party recipients outside Meglion

Service Providers (Data Processors). For our activities, we also rely on companies outside our corporate group (e.g., order fulfillment, payment processing, fraud detection and identity verification, website operation, market research, support services, promotions, website development, data analysis, customer service, etc.). Service providers and their designated employees may access and use your personal data on behalf of Meglio solely for the tasks we instruct them to perform. They are obliged to handle your personal data confidentially and keep it secure at all times. If you wish to learn about the data processors used by Meglio and the categories of personal data provided to them, please contact us.

Who may access your personal data at Meglion and the Joint Data Controllers? Your personal data is handled by our authorized employees or agents on a "need to know" basis, depending on the purposes for which the data was collected (e.g., our customer service staff have access to customer data).

10. YOUR RIGHTS

You are entitled to exercise your rights concerning the personal data processed by Meglio or the Joint Data Controllers as follows:

- a) Access your personal data;
- b) Request correction of your personal data;
- c) Request deletion of your personal data;
- d) Request restriction of the processing of your personal data;
- e) Object to the processing of your personal data;
- f) Receive your personal data and transmit it to another data controller, if the legal conditions are met (right to data portability);
- g) If the processing of personal data is based on your consent, you may withdraw your consent at any time;
- h) If the processing of personal data is necessary for the legitimate interests of the data controller or a third party, you may object to the processing.

You may exercise these rights against any Joint Data Controller as provided under applicable law, including the GDPR.

You can submit your request to exercise the above rights to the contact details listed in Section 1 of this Privacy Notice.

Each Joint Data Controller will provide information on actions taken in response to your request without undue delay, usually within one month of receipt of the request. If no actions are taken, information will be provided on the reasons for not taking action within one month. If you disagree with the response or actions, you have the right to seek legal remedies.

The provision of information is generally free of charge; however, if your requests are clearly unfounded or excessive, particularly due to their repetitive nature, a reasonable fee based on administrative costs may be charged, or we may refuse to act on the request.

All recipients with whom your personal data has been shared will be informed of any corrections, deletions, or restrictions on processing, unless impossible or requiring disproportionate effort, in which case information about the recipients will be provided.

10.1 Right of Access

You have the right to access the data stored about you, to request information about whether your personal data is being processed, to review the data, and to receive a paper or electronic copy. You are also entitled to information on the sources of your personal data.

10.2 Right to Rectification

You have the right to request the correction of inaccurate personal data without undue delay and to request the completion of incomplete personal data. This right may also be exercised via modifications in your user account.

10.3 Right to Erasure ("Right to be Forgotten")

You have the right to request the deletion of personal data without undue delay if any of the following apply:

- a) The personal data is no longer necessary;
- b) Consent on which the processing is based has been withdrawn and there is no other legal basis;
- c) You object to the processing and there is no overriding legitimate reason for it;
- d) The personal data has been processed unlawfully;
- e) The personal data must be deleted under law.

Please note that in some cases, deletion of personal data requires deletion of your user account. Personal data will not be deleted if processing is necessary for: (i) exercising freedom of expression and information; (ii) compliance with a legal obligation; or (iii) establishment, exercise, or defense of legal claims.

10.4 Right to Restrict Processing

You have the right to request restriction of processing if:

- You contest the accuracy of the personal data;
- The processing is unlawful and you oppose deletion;
- Data is no longer needed for processing purposes, but you require it for legal claims;
- You object to processing based on legitimate interests, pending verification of whether the data controller's legitimate interests override yours.

Restricted personal data may only be processed, except for storage, with your consent, for legal claims, to protect the rights of others, or for important public interest reasons. You will be informed before lifting the restriction.

10.5 Right to Object

You may object at any time for reasons related to your particular situation to the processing of your personal data based on legitimate interests, especially for direct marketing. In such cases, your personal data cannot be further processed unless overriding legitimate grounds or legal claims exist.

10.6 Right to Data Portability

You may receive your personal data in a structured, commonly used, machine-readable format and transmit it directly to another data controller if:

- Processing is based on consent or necessary for a contract; and
- Processing is automated (IT system-based, not paper-based).

Both conditions must be met for data portability to apply.

11. OPTIONS FOR CONTROLLING THE USE AND SHARING OF YOUR PERSONAL DATA

We strive to give you control over your personal data wherever possible:

Cookies and Similar Technologies. You may manage consent via our tools or browser settings. See our Cookie Policy.

Advertising, Marketing, and Promotions. You may consent via registration forms or customer service staff to receive information about products and services. You may unsubscribe at any time. Non-marketing notifications will continue.

Personalization (Offline and Online). You may opt-in via registration checkboxes or customer service for personalized services or targeted ads. You may opt-out via account settings or customer service.

Targeted Advertising. Meglio cooperates with advertising providers to deliver interest-based ads. You can opt-out via www.aboutads.info/choices or app-based tools. Location tracking can be disabled in your device settings.

12. SECURITY MEASURES

Your personal data is kept confidential and secure with appropriate measures. Protection does not extend to information you voluntarily share publicly.

User Responsibilities. Choose strong passwords, keep them confidential, log out on shared/public computers, and use privacy settings.

13. COOKIES/SIMILAR TECHNOLOGIES, LOG FILES, AND WEB BEACONS

Cookies and Similar Technologies. Our website does not use cookies.

Log Files. We collect browsing and usage data via log files for troubleshooting, performance, and security.

Web Beacons. Small graphical codes in web pages or emails collect information such as IP address and email interactions. This data is used for analytics, reporting, advertising, and personalization.

14. CHANGES TO THIS PRIVACY NOTICE

We may update this Notice if personal data practices change. We reserve the right to modify practices and this Notice at any time. Check the website regularly for updates. Significant changes will be communicated appropriately.