

**Extract from the PRIVACY TESTAMENT REPORT pursuant to Article 6(1)(f) of the
General Data Protection Regulation (GDPR)
on the data management of the Utánvét Ellenőr (Cash On Delivery Auditor) technology
solution developed by Utánvét Ellenőr Kft.**

Introduction

The "**Utánvét Ellenőr Kft.**" (registered office: 8640 Fonyód, Szigligeti utca 10., company registration number:14- 09-320385, tax number: 32393640-2-14, hereinafter referred to as the **Operator**), was created as a technological solution to help customers of legally operating webshops to strengthen their obligations to collect parcels on delivery. The performance of this interest-testing is based on the joint processing of data by Utánvét Kontroll Kft. and the webshop using the service, and the Parties will document in writing the use of the legal basis for the interest-testing, with regard to compliance with the principle of accountability, as set out in Article 5(2) of the GDPR.

When checking the purchase history of the customer and saving the outcome of the related orders, the hash, phone number and delivery address generated from the e-mail address provided by the customer using the SHA256 procedure is used as the initial data for the operation of the After Sales Checker.

Based on the above, the system calculates a metric from the customer's parcel receipt data¹ is sent back to the webshop, which decides on the basis of its own settings whether to allow or - if the resulting indicator does not reach the specified threshold² - hides the cash on delivery payment method from the customer, or marks the order as an order where there is a risk that the customer will not receive the parcel sent.

In the case of cash-on-delivery, the customer will only pay for the goods ordered online afterwards, when they are received, usually by the courier or at the point of delivery, at the vending machine. Depending on the contract between the webshop and the courier, the "cash on delivery handling fee" is either part of the delivery costs or a separate cost item for the webshop, and will be partly paid by the customer at the time of receipt of the product.

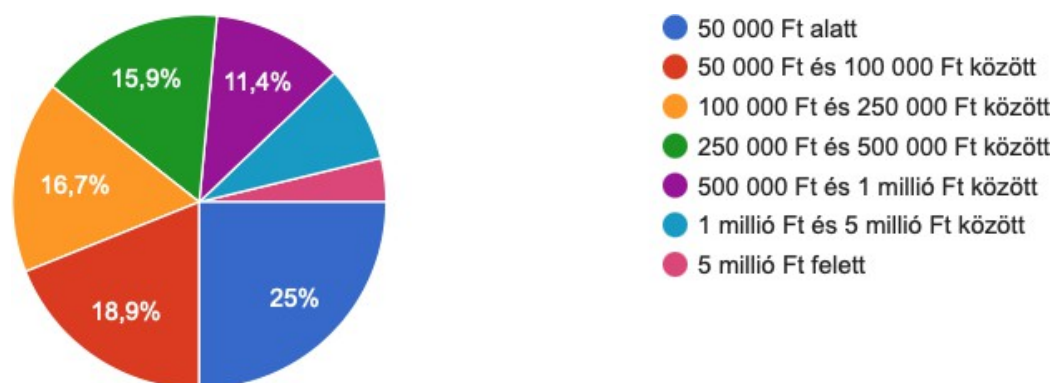
In recent years, the refusal or non-receipt of parcels ordered by customers by cash on delivery has been on the rise: in this case, the customer does not exercise his right of withdrawal, does not notify the online shop of his intention to do so, but simply does not accept the parcel. This represents a continuing financial loss for the businesses operating the webshop, which will increase with the widespread use of parcel machines.

¹ Indicator: a number between -1 and +1 representing the reliability of the buyer. The formula and calculation of reputation [can be found here](#).

² Threshold: a number representing the sensitivity of a given webshop, which indicates the number of indicators a customer must have in order to be considered positive.

Ecommerce Hungary's Small Business Chapter conducted a survey in 2023 on the issue of non-taken over packages, which resulted in the following findings:

- 63% of purchases were made by cash on delivery,
- nearly four fifths of webshop operators said that the proportion of packages not taken over was at least 1% of total sales, while for one third of them it was more than 2%,
- on average, a package that is not accepted causes between 2000 and 4000 HUF damage to an online shop operator,
- over the course of a year, the average extra cost to respondents of not having taken out a package was between HUF 250,000 and 500,000.



Data controllers:

Operator:

Name of data controller	Utánvét Ellenőr Kft
Tax number	32393640-2-14
Company registration number	14-09-320385
Headquarters	8640 Fonyód, Szigligeti utca 10.
E-mail	hello@utanvet-ellenor.hu
Web	https://utanvet-ellenor.hu

Webshop

Name of data controller	Gallmed Kft
Tax number	22999489-2-03
Company registration number	03-09-121132
Headquarters	6500 Baja, Szarvas Gábor utca 3.
E-mail	gallmed@gallmed.hu
Web	https://gallmet.hu

Legal basis for processing:

In the performance of its statutory tasks, the controller shall carry out processing on the basis of a legitimate interest within the meaning of Article 6(f) of Regulation 2016/679 of the European Parliament and of the Council.

Identification of the legitimate interest of the controller, the purpose of the processing:

The data are processed by the Data Controllers on the basis of Article 6(f) of the GDPR, which states that the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller, which are the legitimate interests:

- For the Operator: the operation of the Utánvét Ellenőr.
- In the case of a webshop: to avoid or minimise the potential damage caused by the breach of contract by its customers.

The aim of the service is to avoid or minimise the potential damage caused by a breach of contract by the customers of online shops.

The legitimate interest mentioned by the Operator is basically composed of two elements:

- **exercise of the freedom to conduct a business or the right to property;**
- **a legitimate economic interest in the development of the Follow-up Checker as a service and thus in the retention of webshops as subscribers, and in the elimination of additional costs caused by the breach of contract.**

Identification of the rights and freedoms of the person concerned:

Named personal rights under Act V of 2013 on the Civil Code § 2:43

c); d, e), the right to privacy and the right to freedom of choice of services. With respect to these rights, the processing limits the data subjects' right to the protection of personal data in that the data subjects may not necessarily be able to make a cash on delivery purchase in the online shop using the service as a result of the operation.

Carry out a weighing:

On the basis of the impact assessment carried out (in a separate detailed document), it can be concluded that there is a legitimate interest on the part of the data controllers (legitimate economic interest in improving services and thereby retaining subscribers, and legitimate interest in preventing harm and avoiding or minimising the potential harm to customers caused by a breach of contract), and **the** rights and freedoms of customers (right to privacy, rights relating to personality, in particular the right to the protection of personal data) and the interests involved, **where the data controllers fully enforce and provide the guarantees set out below.**

- Transparency, proper information
- Facilitating the exercise of objections and other rights of interested parties
- Hash-elt database
- Making other shopping methods available instead of cash on delivery (not excluded from online shopping, not banned).

Furthermore, the processing of personal data in this way is purpose-limited, taking into account data economy and limited storage.

Data subjects concerned by personal data processing:

The consumer who buys from webshops (a webshop or webshop is actually a website selling products and services). It usually includes an online shopping cart, in which the goods you want to buy are virtually placed.

Scope of the data processed:

Data category	Data name
unique identifier generated by the system	hash formed from an e-mail address
purchase qualification	the +/- output of the given order
contact details	phone number
delivery details	delivery address

Data processing period: 8 years after the creation of the data.

Ensuring that the data subject is properly informed and that the balancing of interests is documented:

This extract from the interest test is available to all data subjects on the website of the Aftercare Supervisor and the relevant website of the webshop concerned.

Baja, 15.07.2024.