

GDPR DATA PROCESSING NOTICE OF FREEMOTIONCONTROLSOFTWARE.COM WEBSITE

Effective Date: November 17, 2025, until withdrawn

I. General Provisions

1. Data Controller Information

The entity responsible for the data processing activities specified in this Notice is:

Designation	AMC Europe Kft.
Registered Seat	Csiri utca 13 H-2045 Törökbálint Hungary
Company Registry No.	13-09-103767
Tax Number	HU10854790
Contact (General)	info@freemotioncontrolsoftware.com
Contact (Orders)	sales@freemotioncontrolsoftware.com
Website	freemotioncontrolsoftware.com

2. Purpose and Legal Basis of the Notice

The purpose of this Notice is to provide information on data subjects, in a concise, transparent, intelligible, and easily accessible form, about the processing of their personal data, in accordance with Articles 13 and 14 of the **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679).

3. Principles Relating to Processing (GDPR Article 5)

The Controller shall adhere to the following principles when processing personal data:

- **Lawfulness, fairness, and transparency:** Data shall be processed lawfully, fairly, and in a transparent manner.
- **Purpose limitation:** Data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data minimization:** Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Data shall be accurate and, where necessary, kept up to date.
- **Storage limitation:** Data shall be kept in a form which permits identification of data subjects no longer than is necessary.
- **Integrity and confidentiality:** Data shall be processed in a manner that ensures appropriate security of the personal data, including protection against

unauthorized or unlawful processing and against accidental loss, destruction, or damage.

II. Detailed Description of Data Processing Activities

The Controller primarily processes personal data in connection with two main activities: **fulfilling webshop orders** and **managing email correspondence**.

1. Webshop Order Fulfilment

Description	Webshop Contracting, Fulfilment, Invoicing, and Shipping
Purpose	Establishment and execution of the sales contract (shipping, payment, invoicing), evidence of contract performance, and fulfilment of legal obligations.
Categories of Data	Name, delivery address, billing address, email address, telephone number, order, and payment details.
Legal Basis	GDPR Article 6(1)(b): Processing is necessary for the performance of a contract to which the data subject is party (purchase). GDPR Article 6(1)(c): Compliance with a legal obligation (accounting and tax obligations towards the NAV/tax authority).
Retention Period	8 years for invoicing data (name, address) as required by the Hungarian Accounting Act (Act C of 2000, Section 169(2)).

2. Contact and Inquiry Management

Description	Email Correspondence
Purpose	Answering inquiries, questions, and requests for information initiated by the data subject.
Categories of Data	Name (if provided), email address (info@freemotioncontrolsoftware.com), and the content of the message.
Legal Basis	GDPR Article 6(1)(a): The data subject's consent (by initiating contact via email).
Retention Period	Until the question is answered or the correspondence is closed, but no longer than 1 year, unless the inquiry leads to a contractual relationship.

III. Data Processors and Data Transfers

The Controller engages the following external service providers (data processors) under written Data Processing Agreements compliant with GDPR Article 28. The Controller encourages data subjects to review the privacy policies of these external processors.

1. Website, Hosting, and Payment

Data Processor	Activity	Data Protection Notice Link
Google Sites (Google Ireland Ltd.)	Website hosting service.	https://policies.google.com/privacy?hl=hu
Stripe, Inc.	Payment service and management of order-related data.	https://stripe.com/en-hu/privacy
NAV (National Tax and Customs Administration)	Data recipient based on legal obligation. Online invoicing.	Based on legal obligation.

2. Invoicing, Logistics, and Email Management

Data Processor	Activity	Data Protection Notice Link
Kronosz Kft. (Actual)	Invoicing software developer/maintenance. Database runs on AMC Europe's server. Kronosz Kft. only accesses data for maintenance under the Controller's instruction.	
Dotrool Kft.	Email hosting service (info@freemotioncontrolssoftware.com and sales@freemotioncontrolsoftware.com).	https://dotroll.com/en/privacy-policy/
FEDEX	Courier service (Shipping).	https://www.fedex.com/hu-hu/privacy-policy.html
TNT	Courier service (Shipping).	https://www.tnt.com/express/hu_hu/site/privacy-policy.html
UPS	Courier service (Shipping).	https://www.ups.com/hu/hu/support/shipping-support/legal-terms-conditions/privacy-notice
GLS	Courier service (Shipping).	https://gls-group.com/HU/hu/adatkezelesi-tajekoztato
DLS (DHL)	Courier service (Shipping).	https://mydhl.express.dhl/content/dam/downloads/global/privacy-notice/express_privacy_notice-v1.2c_hu_hu.pdf

3. Data Transfer to Third Countries

The Controller may transfer data to a **third country outside the European Union (USA)** via Google Sites (Google) and Stripe. The legal basis for the transfer is the

reliance on **Standard Contractual Clauses (SCCs)** and the implementation of appropriate safeguards, in compliance with GDPR requirements.

IV. Rights of the Data Subject

Data subjects may exercise their rights by submitting a request to the Controller (contact details in Section I). The Controller shall inform you of the subject of the action taken within **one month** of receipt of the request.

1. **Right of Access (GDPR Article 15):** The right to obtain confirmation as to whether personal data concerning them are being processed, and to access that data.
2. **Right to Rectification (GDPR Article 16):** The right to obtain the rectification of inaccurate personal data or to have incomplete personal data completed.
3. **Right to Erasure ("Right to be Forgotten") (GDPR Article 17):** The right to obtain the erasure of personal data, unless processing is necessary for compliance with a legal obligation (e.g., mandatory 8-year retention of invoices).
4. **Right to Restriction of Processing (GDPR Article 18):** The right to obtain restriction of processing under specified circumstances (e.g., contest the accuracy of the data).
5. **Right to Data Portability (GDPR Article 20):** The right to receive the personal data provided to the Controller in a structured, commonly used, and machine-readable format.
6. **Right to Object (GDPR Article 21):** The right to object at any time to processing based on the Controller's legitimate interests (GDPR Article 6(1)(f)).

V. Legal Remedies

The data subject may file a complaint with the **National Authority for Data Protection and Freedom of Information (NAIH)** or initiate judicial remedies if they believe their rights have been violated.

- **NAIH Contact Details:** Falk Miksa utca 9-11., H-1055 Budapest Hungary, Website: <https://www.naih.hu>
- **Judicial Remedy:** The data subject may bring proceedings before a court of law against the Controller or Processor.

VI. Technical and Organizational Security Measures (TOSI)

The Controller implements appropriate technical and organizational measures (TOSI) to ensure a level of security appropriate to the risk (GDPR Article 32), with a focus on confidentiality, integrity, availability, and resilience.

1. **Website and Hosting Security (Google Sites):**
 - Communication between the website and the user is secured by **TLS/HTTPS encryption**.
 - **Cookie management** is in place, only using strictly necessary cookies or those requiring explicit user consent.
2. **Email Management (Dotrooll Kft. – Roundcube and Thunderbird):**
 - **Network Encryption:** Email connections (Thunderbird client and Roundcube web interface) use SSL/TLS protocols to prevent eavesdropping.
 - **Access Control:** Access to sales@freemotioncontrolsoftware.com and info@freemotioncontrolsoftware.com is strictly limited to designated, authorized administrators.
 - **Client Security (Thunderbird):** Corporate PCs utilize **up-to-date operating systems, antivirus software, and mandatory screen locking** (e.g., after 5 minutes of inactivity) to protect access to the email client.
3. **Invoicing and Database Security (Actual – AMC Europe Server):**
 - **Physical and Logical Access Control:** Physical access to the server area is restricted. Database access is password-protected and limited based on required job roles.
 - **Logging:** Database operations are logged to ensure accountability.
 - **Kronosz Kft. Maintenance:** Access for maintenance purposes is strictly controlled, supervised by the Controller, and limited solely to the specific maintenance task.