



Domain clmaster.co.uk
E-mail info@clmaster.co.uk
Company CLMaster Ltd.

Data processing information

Acceptance date: 2025-09-01

Data controller

Name: CLMaster Ltd.

Headquarters: 167-169 Great Portland Street, London, England, W1W 5PF

Mailing address, complaint handling: 167-169 Great Portland Street,
London, England, W1W 5PF

E-mail: info@clmaster.co.uk

Website: <https://clmaster.co.uk>

Hosting provider

Name: CLMaster Ltd. (The Service Provider provides the hosting of the Website for itself)

Mailing address: 167-169 Great Portland Street, London, England, W1W 5PF

Email address: info@clmaster.co.uk

Description of data processing carried out during the operation of the webshop

Information about the use of cookies

What are cookies?

The Data Controller uses so-called cookies when visiting the website. A cookie is a package of information consisting of letters and numbers that our website sends to your browser in order to save certain settings, make our website easier to use and help us collect some relevant, statistical information about our visitors.

Some cookies do not contain personal information and are not suitable for identifying an individual user, but some contain a unique identifier - a secret, randomly generated string of numbers - that is stored on your device, thereby ensuring your identification. The operating period of each cookie is included in the relevant description of each cookie.

Legal background and legal basis of cookies:

We basically distinguish three types of cookies: cookies that are essential for the proper functioning of the Website, cookies for statistical purposes, and cookies for marketing purposes.

The legal basis for data processing is your consent pursuant to Article 6(1)(a) of the Regulation in the case of cookies for statistical and marketing purposes, and the legitimate interest necessary to ensure the operation of the Website pursuant to Article 6(1)(f) of the Regulation in the case of cookies necessary for operation.

The main characteristics of the cookies used by the website:

Cookies that are essential for operation:



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If you do not accept the use of these cookies, certain features may not be available to you.

Cookies that are strictly necessary for operation: These cookies are essential for the use of the website and enable the use of basic functions of the website. Without them, many functions of the website will not be available. The lifespan of these types of cookies is limited solely to the duration of the session.

language: Language cookie

Cookies for statistical purposes:

Google Analytics cookies: Google Analytics is Google's analytics tool that helps website and app owners get a better understanding of their visitors' activities. The service may use cookies to collect information and report on website usage statistics without personally identifying visitors to Google. The main cookie used by Google Analytics is the "__ga" cookie. In addition to reporting on website usage statistics, Google Analytics, together with some of the advertising cookies described above, may also be used to show more relevant ads in Google products (such as Google Search) and across the web.

Marketing cookies:

Google Adwords cookies When someone visits our site, the visitor's cookie ID is added to the remarketing list. Google uses cookies, such as NID and SID cookies, to personalize the ads you see on Google products, such as Google Search. For example, Google uses these cookies to remember your recent searches, your previous interactions with ads or search results from individual advertisers, and your visits to advertisers' websites. AdWords conversion tracking uses cookies. It saves cookies on a user's computer when a person clicks on an ad to track sales and other conversions resulting from an ad. Some common uses of cookies include: selecting ads based on what is relevant to the user, improving campaign performance reporting, and avoiding showing ads that the user has already seen.

You can find more information about deleting cookies at the following links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Mozilla: <https://support.mozilla.org/hu/kb/weboldalal-aktal-ellyezett-sutik-torlese-szamito>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Chrome: <https://support.google.com/chrome/answer/95647>
- Edge: <https://support.microsoft.com/hu-hu/help/4027947/microsoft-edge-delete-cookies>

Google Consent Mode v2

The Data Controller has integrated the Google Consent Mode v2 version into its website and provides the management of consents and refusals based on the new version through its cookie panel. Based on the Google Consent Mode v2, Google has integrated the previous two (**analytics_storage, ad_storage**) flag, it uses two additional flags that will be used to store and read cookies for statistical and advertising purposes:

- **ad_user_data:** Any user data may be sent to Google for advertising purposes.
- **ad_personalization:** User data can be used for personalized advertising purposes, such as remarketing.

These two switches are used to determine whether the storage and reading of cookies for statistical and advertising purposes is permitted.

Data processed for the purpose of concluding and fulfilling contracts

In order to conclude and fulfill a contract, several data processing cases may be implemented. We inform you that data _____

2. Effective from this date: 01.09.2025.



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processing related to complaint handling and warranty administration will only be implemented if you exercise one of the aforementioned rights.

If you do not make a purchase through the webshop, but are only a visitor to the webshop, then the provisions on data processing for marketing purposes may apply to you if you give us your consent for marketing purposes.

The data processing carried out for the purpose of concluding and fulfilling contracts is described in more detail:

Contact us

For example, if you contact us via email, contact form, or phone with a question about a product. Prior contact is not mandatory, and you can order from the webshop at any time without doing so.

Managed data

Name, email address

Duration of data processing

30

Legal basis for data processing

Your voluntary consent, which you provide to the Data Controller by contacting us. [Data processing pursuant to Article 6(1)(a) of the Regulation]

Registration on the website

By storing the data provided during registration, the Data Controller can provide a more convenient service (e.g. the data subject does not have to provide it again when making a new purchase). Registration is a condition for concluding a contract

Managed data

During data processing, the Data Controller processes your name, billing address, email address, characteristics of the purchased service and the date of purchase.

Duration of data processing

Until you withdraw your consent.

Legal basis for data processing

Your voluntary consent, which you provide to the Data Controller by registering [Data processing pursuant to Article 6(1)(a) of the Regulation]

Order processing

When processing orders, data processing activities are necessary to fulfill the contract.

Managed data

During data processing, the Data Controller processes your name, mailing address, e-mail address, characteristics of the purchased service, order number and date of purchase.

If you have placed an order in the webshop, data processing and providing data is essential for the fulfillment of the contract.

Duration of data processing

We process the data for 5 years according to the civil law statute of limitations.

Legal basis for data processing

Performance of the contract. [Data processing pursuant to Article 6(1)(b) of the Regulation]

Issuance of the invoice



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The data management process is carried out in order to issue invoices in accordance with the law and to fulfill the obligation to retain accounting documents. According to Section 169 (1)-(2) of the Act on Accounting, business companies have they must retain accounting documents directly and indirectly supporting the accounting records.

Managed data

Name, address, email address, billing address.

Duration of data processing

Issued invoices must be kept for 8 years from the date of issue of the invoice, pursuant to Section 169 (2) of the Hungarian Revenue Act.

Legal basis for data processing

Pursuant to Section 159 (1) of Act CXXVII of 2007 on Value Added Tax, the issuance of an invoice is mandatory and it must be kept for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting [Data processing pursuant to Article 6 (1) c) of the Regulation].

Handling other consumer complaints

The data processing process is carried out in order to handle consumer complaints. If you have contacted us with a complaint, data processing and the provision of data is essential.

Managed data

Customer name, email address, content of complaint.

Duration of data processing

Consumer complaints are kept for 3 years in accordance with the Consumer Protection Act.

Legal basis for data processing

It is your voluntary decision whether to contact us with a complaint, however, if you contact us, we are obliged to keep the complaint for 3 years pursuant to Section 17/A. (7) of Act CLV of 1997 on Consumer Protection [Data processing pursuant to Article 6 (1) c) of the Regulation].

Data processed in connection with the verification of consent

During registration, ordering, or subscribing to the newsletter, the IT system stores the IT data related to the consent for later proof.

Managed data

Date of consent and IP address of the data subject.

Duration of data processing

Due to legal requirements, consent must be proven later, therefore the data storage period is limited to the limitation period following the termination of data management.

Legal basis for data processing

This obligation is laid down in Article 7(1) of the Regulation. [Data processing pursuant to Article 6(1)(c) of the Regulation]

Data processing for marketing purposes

Data processing related to sending newsletters

The data processing process is carried out for the purpose of sending newsletters.

Managed data

Name, email address.

Duration of data processing



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Until the data subject withdraws their consent.

Legal basis for data processing

Your voluntary consent, which you provide to the Data Controller by subscribing to the newsletter [Data processing pursuant to Article 6(1)(a) of the Regulation]

Data processing related to sending and displaying personalized advertising

The data processing process is carried out in order to send advertising content that is relevant to the interests of the data subject.

Managed data

Name, address, email address.

Duration of data processing

Until you withdraw your consent.

Legal basis for data processing

Your voluntary, specific consent, which you provide to the Data Controller during the collection of data [Data processing pursuant to Article 6(1)(a) of the Regulation]

Further data processing

If the Data Controller intends to carry out further data processing, it will provide prior information on the essential circumstances of the data processing (legal background and legal basis of data processing, purpose of data processing, scope of data processed, duration of data processing).

Recipients of personal data

Data processing for the storage of personal data

Name of the data processor: CLMaster Ltd. (The Service Provider provides the hosting of the Website for itself)

Contact details of the data processor:

Email address: info@clmaster.co.uk

Headquarters: 167-169 Great Portland Street, London, England, W1W 5PF

Website: www.clmaster.co.uk



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Billing-related data processing

Name of the data processor:

The data processor's registered office is: Xero (UK) Limited, 5th Floor, 100 Avebury Boulevard, Milton Keynes, MK9 1FH, United Kingdom

Data processor's telephone number: Xero Denmark A/S, Kuglegårdsvej 7, 1434 Copenhagen K, Denmark.

Email address of the data processor: legalnotices@xero.com

Data processor's website: <https://www.xero.com/>

The Data Processor cooperates in the registration of accounting documents based on a contract concluded with the Data Controller. In the course of this, the Data Processor processes the name and address of the data subject to the extent necessary for the accounting registration, for a period in accordance with Section 169 (2) of the Personal Data Act, and then deletes it.

Data processing related to the operation of the CRM system

Name of the data processor: HIGH LEVEL

The data processor's registered office is: 400 North Saint Paul St. Suite 920 Dallas, Texas 75201

Data processor's telephone number: (888) 732-4197

Email address of the data processor: info@gohighlevel.com

Data processor's website: <https://www.gohighlevel.com/>

The Data Processor cooperates in the registration of orders based on the contract concluded with the Data Controller. In doing so, the Data Processor processes the name, address, telephone number, number and date of orders of the data subject within the civil law limitation period.

Data processing related to online payments

Name of the data controller: Revolut Ltd.

The data controller's registered office is: 7 Westferry Circus, Canary Wharf, London, England, E14 4HD

Data controller's email address: dpo@revolut.com

The data controller's website: revolut.com

The payment service provider participates in the implementation of the Online payment based on a contract concluded with the Data Controller, for which purpose data is transferred to the online payment service provider during the purchase process. In the process, the online payment service provider processes the billing name, name and address of the data subject, the order number and date in accordance with its own data management rules.

The purpose of data transmission is to provide the online payment service provider with the transaction data necessary for the payment transaction initiated by the online payment service provider related to the purchase.

Legal basis for data transfer: performance of the contract concluded between you and the Data Controller pursuant to Article 6(1)(b) of the Regulation, which includes payment by the buyer, and in the case of online payment, data transfer pursuant to this point is required for payment

Your rights during data processing

Within the period of data processing, you have the following rights in accordance with the provisions of the Regulation:



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- the right to withdraw consent
- right to access and rectification of personal data and information related to data processing
- processing
- restriction of data
- processing, right to erasure
- right to protest
- right to portability.

If you wish to exercise your rights, this will involve your identification, and the Data Controller will necessarily have to communicate with you. Therefore, for the purpose of identification, it will be necessary to provide personal data (but identification may only be based on data that the Data Controller already processes about you), and your complaint regarding data processing will be available in the Data Controller's email account within the period specified in this information regarding complaints. If you were our customer and would like to identify yourself for the purpose of complaint management or warranty management, please provide your order ID for identification. Using this, we can also identify you as a customer.

The Data Controller will respond to complaints related to data processing within 30 days at the latest.

Right to withdraw consent

You have the right to withdraw your consent to data processing at any time, in which case we will delete the data you have provided from our systems. However, please note that in the case of an order that has not yet been fulfilled, withdrawal may result in us not being able to deliver it to you. In addition, if the purchase has already been made, we cannot delete billing-related data from our systems based on accounting regulations, and if you have a debt to us, we may process your data based on our legitimate interest in collecting the debt even if you withdraw your consent.

Access to personal data

You have the right to receive feedback from the Data Controller as to whether your personal data is being processed and, if processing is in progress, you have the right to:

- obtain access to the personal data processed and be informed by
- the Data Controller about the following information:
 - the purposes of data processing;
 - the categories of personal data processed about you;
 - information about the recipients or categories of recipients to whom the personal data have been or will be disclosed by the Data Controller;
 - the planned period for which the personal data will be stored or, if this is not possible, the criteria for determining this period;
 - your right to request from the Data Controller the rectification, erasure or restriction of processing of personal data concerning you, and to object to the processing of such personal data where processing is based on legitimate interest;
 - the right to lodge a complaint with the supervisory authority;
 - if the data was not collected from you, all available information about its source;
 - the fact of automated decision-making (if such a procedure is used), including profiling, and at least in these cases, understandable information about the logic involved and the significance and likely consequences of such processing for you.

The purpose of exercising the right may be to establish and verify the lawfulness of data processing, therefore, in the event of multiple requests for information, the Data Controller may charge a fair fee in exchange for providing the information.

The Data Controller provides access to personal data by sending you the processed personal data and information by email after you have been identified. If you have registered, we provide access so that you can view and check the personal data processed about you by logging into your user account.



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Please indicate in your request whether you are requesting access to personal data or information related to data processing.

Right to rectification

You have the right to request that the Data Controller correct inaccurate personal data concerning you without delay.

Right to restrict data processing

You have the right to request that the Data Controller restrict data processing if one of the following applies:

- You dispute the accuracy of the personal data, in which case the restriction applies for a period of time that allows the Data Controller to verify the accuracy of the personal data; if the accuracy of the data can be determined immediately, the restriction will not apply;
- the data processing is unlawful, but you oppose the deletion of the data for any reason (for example, because the data is important to you for the enforcement of a legal claim), therefore you do not request the deletion of the data, but instead request the restriction of its use;
- the Data Controller no longer needs the personal data for the specified data processing purposes, but you require them for the establishment, exercise or defense of legal claims; or
- You have objected to the data processing, but the legitimate interests of the Data Controller may also justify the data processing, in which case, until it is determined whether the legitimate grounds of the Data Controller override your legitimate grounds, the data processing must be restricted.

Where processing is subject to restrictions, such personal data may be processed, with the exception of storage, only with the consent of the data subject, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for important public interest reasons of the Union or of a Member State.

The data controller will inform you in advance (at least 3 working days before the restriction is lifted) about the lifting of the restriction on data processing.

Right to erasure - right to be forgotten

You have the right to have the Data Controller erase your personal data without undue delay if one of the following reasons applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Data Controller;
- You withdraw your consent and there is no other legal basis for the processing;
- You object to processing based on legitimate interest and there is no overriding legitimate reason (i.e. legitimate interest) for the processing,
- the personal data was processed unlawfully by the Data Controller and this was established based on the complaint,
- the personal data must be erased to comply with a legal obligation under Union or Member State law applicable to the Controller.

If the Data Controller has made personal data processed about you public for any legitimate reason and is obliged to erase them for any of the reasons indicated above, it is obliged to take reasonable steps, taking into account available technology and the cost of implementation, including technical measures, to inform other data controllers processing the data that you have requested the erasure of links to the personal data in question or of copies or replications of these personal data.

Erasure does not apply if data processing is necessary:



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- for the purpose of exercising the right to freedom of expression and information;
 - under EU or Member State law applicable to the controller, which requires the processing of personal data to fulfill an obligation (such a case is data processing carried out within the framework of invoicing, since the retention of the invoice is required by law), or for the purpose of performing a task carried out in the public interest or in the exercise of official authority vested in the data controller;
 - to submit, enforce or defend legal claims (e.g. if the Data Controller has a claim against you and has not yet fulfilled it, or a consumer or data processing complaint is in progress).

Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on legitimate interest. In such a case, the Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such purposes, including profiling, insofar as it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for such purposes.

Right to portability

If the data processing is carried out by automated means or if the data processing is based on your voluntary consent, you have the right to request the Data Controller to receive the data you have provided to the Data Controller, which the Data Controller will make available to you in xml, JSON, or csv format, if this is technically feasible, you may request that the Data Controller transmit the data in this form to another data controller.

Automated decision-making

You have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or similarly significantly affects you. In such cases, the Controller shall take suitable measures to safeguard the rights, freedoms and legitimate interests of the data subject, including at least the right to obtain human intervention on the part of the Controller, to express his or her point of view and to object to the decision.

The above does not apply if the decision:

- necessary for the conclusion or performance of a contract between you and the controller; permitted by Union or Member State law applicable to the controller which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- based on your express consent.

Data security measures

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, as well as against inaccessibility resulting from changes in the technology used.

The Data Controller will do everything within organizational and technical capabilities to ensure that its data processors also take appropriate data security measures when working with your personal data.



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Legal remedies

Data protection complaint (UK GDPR):

If you believe the Controller has infringed data-protection laws, you may lodge a complaint with the Information Commissioner's Office (ICO).

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Phone: 0303 123 1113

Online complaint: via the ICO's web form.

You are also informed that, if the legal provisions on data processing are infringed or the Controller fails to comply with your request, you may bring a civil claim before the courts (Article 79 UK GDPR) and seek compensation—including for non-material damage—under the Data Protection Act 2018.

Consumer complaint (general e-commerce matters):

In case of a consumer dispute, please contact the Citizens Advice Consumer Service. They provide guidance and can refer your complaint to Trading Standards.

Phone: 0808 223 1133

Online report: via Citizens Advice / Trading Standards.

Modification of data processing information

The Data Controller reserves the right to amend this data management information in a way that does not affect the purpose and legal basis of the data management. By using the website after the amendment comes into force, you accept the amended data management information.

If the Data Controller intends to carry out further data processing in relation to the collected data for a purpose other than the purpose of their collection, it will inform you of the purpose of the data processing and the following information prior to further data processing:

- the duration of storage of personal data or, if this is not possible, the criteria for determining the duration;
- the right to request access to, rectification, erasure or restriction of processing of your personal data from the Data Controller, and to object to the processing of your personal data in the case of processing based on legitimate interest, and to request the right to data portability in the case of processing based on consent or a contractual relationship;
- in the case of data processing based on consent, that you can withdraw your consent at any time, and
- the right to lodge a complaint with the supervisory authority;
- whether the provision of personal data is based on a legal or contractual obligation or is a prerequisite for entering into a contract, and whether you are obliged to provide the personal data, as well as the possible consequences of failure to provide the data;
- the fact of automated decision-making (if such a procedure is used), including profiling, and at least in these cases, understandable information about the logic involved and the significance and likely consequences of such processing for you.

Data processing can only begin after this, if the legal basis for data processing is consent, you must also consent to data processing in addition to being informed.

This document contains all relevant data management information regarding the operation of the webshop, in accordance with the General Data Protection Regulation of the European Union 2016/679 (hereinafter: Regulation. GDPR) and Act CXII of 2011 (hereinafter: Infotv.).