

Az általános adatvédelmi rendelet (GDPR) 6. cikk (1) bekezdés f) pontja szerinti

ÉRDEKMÉRLEGELÉSI TESZT

**az Utánvét Ellenőr Kft. által fejlesztett Utánvét Ellenőr technológiai megoldás
adatkezelésére vonatkozóan**

Introduction

Operated by “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), Utánvét Ellenőr, as a technological solution, was created with the intention of helping customers of legally operating webshops to strengthen their obligations to receive packages via cash on delivery. The performance of this balancing of interests test is based on the joint data processing of Utánvét Ellenőr Kft. and the Webshop using the service, and the Parties shall document in writing the application of the legal basis for balancing of interests, with regard to Article 5(2) of the GDPR and compliance with the principle of accountability.

When checking the customer's purchase history and saving the outcome of the related orders, the hash, phone number and delivery address generated by the SHA256 process from the email address provided by the customer, serves as the starting data in the operation of the Cash on Delivery Checker.

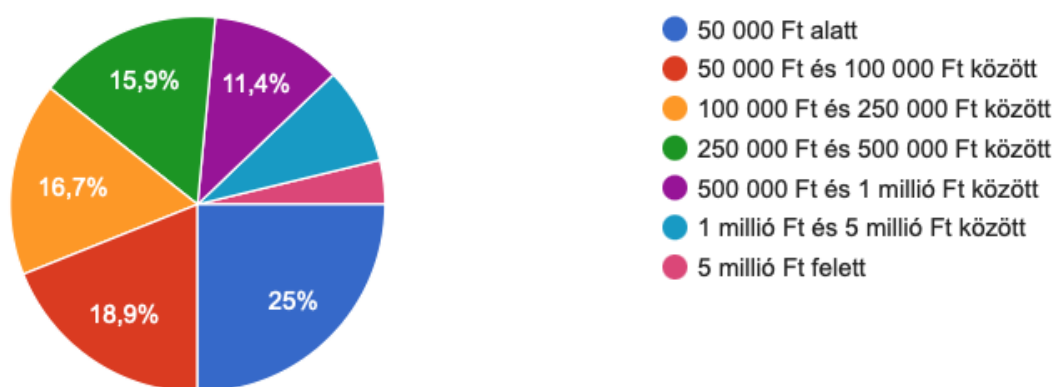
Based on the above, the system sends a calculated index number from the data related to the customer's package receipt back to the webshop, which decides based on its own settings: allows or - if the received index number does not reach the specified threshold - hides the cash on delivery payment method from the customer, or marks the order as an order for which there is a risk that the customer will not receive the sent package.

In the case of a cash on delivery purchase, the customer will only pay the price of the product ordered online afterwards, upon receipt, usually to the courier or at the collection point, in the parcel machine. Depending on the contract between the webshop and the courier service, the “cash on delivery handling fee” arising from the cash on delivery payment is part of the shipping costs or is charged to the webshop as a separate cost element, so its consideration will be partially paid by the customer upon receipt of the product.

In recent years, the number of refusals and non-acceptances of packages ordered by customers on cash on delivery has been continuously increasing: in such cases, the customer does not exercise his right of withdrawal, does not indicate this intention to the webshop, but simply does not accept the package. This represents a continuous financial loss for businesses operating the webshop, which is increasing even further with the widespread use of parcel machines.

Regarding undelivered packages, the Ecommerce Hungary Small Business Association conducted a survey in 2023, which yielded the following results:

- In 63% of purchases, customers chose the cash on delivery payment method,
- Nearly four-fifths of webshop operators responded that the ratio of undelivered packages was at least 1% compared to all sales, while in the case of one-third of them this ratio exceeded 2%,
- An undelivered package causes an average loss of between 2,000 and 4,000 HUF to a webshop operator,
- In one year, undelivered packages caused an average additional expense of 250,000-500,000 HUF to the respondents.



Data controllers:

Operator:

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

Webáruház

Name of the data controller	SC Safety Center SRL
Tax number	RO23947888
Company registration number	J30/762/2008
Headquarters	440115 Satu Mare, Iuliu Maniu 21
E-mail	peter.kallos@safety-center.ro
Web	www.safety-center.ro

Legal basis for data processing:

In the performance of its statutory tasks, the data controller carries out data processing based on the legitimate interest referred to in Article 6(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council.

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

The data are processed by the Data Controllers based on Article 6(f) of the GDPR, according to which data processing is necessary to enforce the legitimate interests of the data controller, which legitimate interest is:

- **In the case of the Operator: operation of the Cash on Delivery Checker.**
- **In the case of an online store: avoiding or minimizing potential damages caused by breach of contract by its customers.**

The purpose of the service is to avoid or minimize potential damages caused by breach of contract by customers of online stores.

The legitimate interest mentioned on the Operator's page basically consists of two elements:

- **exercise of the freedom of enterprise and the right to property;**
- **legitimate economic interest in developing the Cash on Delivery Inspector as a service and thus in retaining webshops as subscribers, and in eliminating additional expenses caused by breach of contract.**

Identification of the rights and freedoms of the data subject:

Named personality rights based on Section 2:43. c); d, e) of Act V of 2013 on the Civil Code, the right to respect for private life, and the right to free choice of services. With regard to these rights, data processing limits the data subjects' right to the protection of personal data in that the data subjects will not necessarily have the option of cash on delivery purchases in the webshop using the service - as a result of the operation.

Carrying out the assessment:

Based on the impact assessment carried out, it can be established that there is a balance between the legitimate interests of the data controllers (the legitimate economic interest in developing services and thus retaining subscribers and preventing damage, and the avoidance or minimization of potential damage caused by customers in breach of contract) and the rights and freedoms of the customers (the right to privacy, personality rights, in particular the right to the protection of personal data) and the interests related to them if the data controllers fully implement and ensure the following specific guarantees.

- **Transparency, adequate information**
- **Facilitation of the exercise of objections and other data subject rights**
- **Hash-based database**

- **Making other purchasing methods available instead of cash on delivery (not excluded from online purchases, not prohibited).**

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

Data subjects:

Consumers who shop on webshops (a webshop or web store is actually a website selling products and services). It usually includes an online shopping cart, into which we virtually put the goods we want to buy.

Scope of the processed data:

Data category	Data name
unique identifier generated by the system	hash generated from email address
purchase rating	+/- outcome of the given order
contact information	phone number
shipping information	shipping address

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

Implementation of appropriate information for the data subject and documentation of the interest assessment:

This interest assessment test extract is available to all data subjects on the website of the Utánvét Kölnör and the website of the relevant web store.