



Data Privacy Notice – Website

Cookie Handling

Author:	Tamás Szalárdi	Version:	1.0
Reviewed by:	Balázs Imre	Last modified:	2026. 09. 14.
Approved by:	Balázs Imre		

Table of Contents

1. Overview.....	3
1.1 Document Control	3
1.2 Change History	3
2. Applicability	4
3. Introduction.....	4
3.1 Information about the Data Controller	4
3.2 Description of Processing Activities	4
3.2.1 Strictly Necessary Cookies	4
3.2.2 Optional Cookies: Analytics and Marketing Cookies	5
3.2.3 Source of Data	5
4. Data Transfers and Data Security	6
4.1 Information on Cookie Settings.....	6
4.2 Data Security Measures.....	6
5. Rights and Remedies Relating to Personal Data Processing	6
5.1 Right of Access.....	7
5.2 Right to Rectification	7
5.3 Right to Erasure	7
5.4 Right to Restriction of Processing (Blocking).....	7
5.4.1 Right to Data Portability	8
5.5 Right to Object.....	8
5.6 Right to Lodge a Complaint and Seek Judicial Remedy	8

1. Overview

Information security is essential to business success and is particularly important to Defense Pro Hungary Zrt. (hereinafter: Defense Pro or the Organisation). This document sets out the data privacy rules applicable to the website associated with the Pulzaris product owned by Defense Pro Hungary Zrt.

1.1 Document Control

This document shall be reviewed annually and reissued whenever approved changes have been made to its content. Obsolete versions of the document shall be destroyed.

1.2 Change History

Version	Date of Change	Author	Description of Change
1.0	2026.09.14.	Tamás Tóth, Tamás Szalárdi	Initial version

2. Applicability

These provisions shall be interpreted in conjunction with the Organisation's Data Privacy Policy and its other internal policies. In the event of any conflict relating to the protection of personal data between these provisions and any other document that entered into force before this document, these provisions shall prevail.

3. Introduction

The Organisation attaches particular importance to protecting the data of its customers and partners. This Cookie Handling Notice therefore provides detailed information about the processing activities involving cookies used on our website. It explains visitors' rights in relation to personal data processing, the categories of personal data processed, the Organisation's data privacy and processing responsibilities, and the security measures and safeguards implemented.

3.1 Information about the Data Controller

Name of the Data Controller	Defense Pro Hungary Zrt.
Registered office	
Company registration number	
Website	
Email address	
Data Protection Officer	The Data Controller is not required to appoint a Data Protection Officer

3.2 Description of Processing Activities

Cookies are small data files placed in the web browser of the User (website visitor) to collect and store information about the relevant website. This type of data collection may provide convenience features for Users and support the proper operation of the website, while it may also constitute personal data processing. The processing and cookie handling activities carried out on the Pulzaris website are described below.

3.2.1 Essential Cookies

Essential cookies provide functions that are required for the website to operate (e.g. completing forms). Since the website cannot operate without cookies providing these functions, the visitor's consent is not required for their use.

The legal basis for processing is the Data Controller's legitimate interest in ensuring the proper operation of the website, pursuant to Section 13/A(3) of Act CVIII of 2001 on Electronic Commerce Services and Certain Issues Relating to Information Society Services.

3.2.2 Optional Cookies: Analytics and Marketing Cookies

Analytics cookies (Google Analytics and Hotjar) collect statistical data about how a visitor uses the website, including which topics the visitor views, what the visitor clicks and how the visitor scrolls through the website. This information shows, for example, which articles and other content receive the most visits. These cookies are not essential and may therefore be used only with the visitor's consent.

Marketing cookies are used to display targeted, personalised advertisements on various advertising platforms. This processing is not strictly necessary and the cookies may therefore be used only with the Users' consent.

In these cases, the legal basis for processing is the visitor's consent, provided through the pop-up window displayed on the website. Consent may be withdrawn at any time; however, withdrawal does not affect the lawfulness of processing carried out before the withdrawal. Following withdrawal, no further data will be collected or stored.

Name / Provider	Domain	Expiry (duration of processing)	Description (purpose)
Google Analytics	pulzaris.ai	13 months	Google Analytics is used to collect data on how many times the User has visited the website and the dates of the first and most recent visits. It registers a unique identifier used to generate statistical data on how the visitor uses the website.
Hotjar	pulzaris.ai	12 months	Hotjar uses cookies to collect data about Users' behaviour and devices. Hotjar is a technology service that helps us better understand the Users' experience and enables services to be designed and maintained on the basis of User feedback.

3.2.3 Source of Data

For cookies, the source of the data is the Data Subject's activity and the data collection performed by the relevant cookie. Although the Data Subject is the source, not every cookie collects data that enables the specific identification of an individual. No profiling or automated decision-making is carried out in relation to the processing activities described above.

4. Data Transfers and Data Security

In connection with the processing activities described in this Data Privacy Notice, data are transferred to the recipients listed below, who may participate in providing the relevant service or related security solutions.

Information about the recipient	Purpose of data transfer	Data Controller's contact details
Google Ireland	Provision of Google Analytics	Privacy Terms
Hotjar Malta	Website behaviour analysis using Hotjar	Privacy Terms

4.1 Information on Cookie Settings

Modern browsers allow Users to change their cookie settings. Some browsers accept cookies automatically by default, but this setting can be changed to prevent automatic acceptance in the future. Once the setting has been changed, the browser will offer cookie setting options on each subsequent occasion.

Cookies are intended to support and facilitate the usability and operation of the website. If cookies are disabled, the visitor may not be able to use all website functions in full, and the website may operate differently from the way intended in the browser.

Further information on cookie settings is available for the following browsers:

- a) [Chrome](#)
- b) [Firefox](#)
- c) [Internet Explorer](#)
- d) [Microsoft Edge](#)
- e) [Safari](#)

When an ad blocker is used, the cookie banner (including the setting options) may not always be displayed. The ad-blocking function must be disabled for the banner to appear.

4.2 Data Security Measures

The Data Controller implements the necessary technical and organisational measures and establishes appropriate procedural rules to ensure the security of personal data throughout the processing lifecycle. The Data Controller operates an information security management system.

5. Rights and Remedies Relating to Personal Data Processing

The User visiting the website is entitled to the rights described below in connection with the processing activities. The User may exercise these rights by contacting the Data Controller using the contact details provided above.

5.1 Right of Access

The User may request information from the Data Controller as to:

- which personal data are processed;
- the legal basis for processing;
- the purpose of processing;
- the source of the data;
- the period for which the data are processed; and
- to whom, when and on what legal basis access was granted to which personal data, or to whom the personal data were transferred.

In accordance with Article 15 GDPR, the User may request a copy of the personal data processed by the Data Data Controller. The Organisation may charge an administrative fee for additional copies. The requesting User will be informed in advance of the amount of the fee and the method of payment using the contact details provided for this purpose.

5.2 Right to Rectification

The User has the right to have the Data Controller rectify their personal data (for example, the User may change their email address at any time). The Data Controller will comply with the request without undue delay and no later than within one month and will notify the User using the contact details provided for this purpose.

5.3 Right to Erasure

Under the right to erasure, the User has the right to request that the Data Controller erase the User's personal data from its systems without undue delay.

The right to be forgotten extends the right to erasure to the online environment. Where the Data Controller has made the User's personal data public and is obliged to erase those data, the Data Controller shall take reasonable steps to inform other Data Controllers processing the User's personal data that the User has requested the erasure of any links to, or copies or replications of, those personal data.

Personal data cannot be erased or forgotten where any of the circumstances specified in Article 17(3) GDPR applies (for example, where a statutory retention obligation applies).

5.4 Right to Restriction of Processing (Blocking)

The User has the right to request that the Data Controller restrict, commonly referred to as block, processing where any of the following conditions applies:

- The User contests the accuracy of their personal data. In this case, processing will be restricted for the period necessary for the Data Controller to verify the accuracy of those personal data.
- The processing is unlawful and the User opposes the erasure of the personal data and requests the restriction of their use instead.
- The Data Controller no longer needs the personal data for the purposes of processing, but the User requires them for the establishment, exercise or defence of legal claims.

- The User has objected to processing. In this case, processing will be restricted until it is determined whether the Data Controller's legitimate grounds override those of the User. The Data Controller will inform the User in advance before lifting the restriction.

5.4.1 Right to Data Portability

The User may request that the Data Controller provide the personal data concerning the User, which the User has provided, in a structured, commonly used and machine-readable format using the contact details specified for this purpose. The User also has the right to have those data transmitted by the Data Controller to another Data Controller, where technically feasible.

5.5 Right to Object

The User has the right to object, on grounds relating to their particular situation, at any time to processing based on the Data Controller's legitimate interests or carried out in the exercise of official authority. The User also has the right to object at any time to processing for direct marketing purposes, including profiling related to such direct marketing. Where the User objects to processing for direct marketing purposes, the personal data shall no longer be processed for those purposes.

5.6 Right to Lodge a Complaint and Seek Judicial Remedy

If the User considers that the Data Controller has infringed the applicable data protection requirements when processing the User's personal data, the User may:

- raise a complaint with the Data Controller;
- lodge a complaint with the supervisory authority;

Contact details of the Supervisory Authority:

Hungarian National Authority for Data Protection and Freedom of Information

Postal address: 1363 Budapest, P.O. Box 9, Hungary

Address: H-1055 Budapest, Falk Miksa utca 9-11, Hungary

Email: ugyfelszolgalat@naih.hu

Central website: <https://www.naih.hu/>

- bring proceedings before a court.

The User may bring proceedings before a court to protect their personal data. The court will hear the case as a matter of priority. Information on the regional courts is available at: <http://birosag.hu/torvenyszekek>).