



TERVEZET / DRAFT – jogi ellenőrzés alatt. This document is a draft; it is not final and must not be relied on as a contractual basis before legal review.

Convenience translation. The Hungarian version ("Süti (cookie) tájékoztató") prevails in case of any discrepancy.

Cookie Notice

1. In brief

1.1. The hokep3d.hu website (the **Website**) performs **only one strictly necessary storage** on your device without consent: it remembers, in your browser's local storage, which cookie choice you made (Section 4).

1.2. **Visitor statistics** (Google Analytics 4), **behaviour analytics** (Microsoft Clarity) and **ad measurement** (Google Ads conversion measurement) are used **only with your prior, express consent, given per category**. Until you decide, or if you reject, these scripts are **not loaded**, the Website **does not connect** to Google or Microsoft servers and **no measurement cookie** is set.

1.3. Consent is voluntary. The Website, the quote request and all content work without it (no cookie wall). You can change or withdraw your consent at any time with the **"Cookie settings"** link in the page footer.

2. What is a cookie, and when is consent needed?

2.1. A cookie is a small piece of data stored on your device by a website through the browser. Similar technologies are browser local storage (localStorage, sessionStorage, IndexedDB), device fingerprinting and tracking pixels.

2.2. Under s. 155 (4) of Act C of 2003 on electronic communications, storing data on a user's terminal equipment, or accessing data stored there, is allowed only with the user's consent given after clear and complete information (including on the purpose). Under the ePrivacy Directive (2002/58/EC, Article 5 (3)) and established practice, storage that is strictly necessary only for the transmission of a communication or to provide a service the user has expressly requested does not require consent. Cookies for visitor statistics, behaviour analytics and ad measurement are outside that exception, which is why we ask for consent.

2.3. The legal basis for the related processing of personal data is Article 6 (1) (a) of Regulation (EU) 2016/679 (**GDPR**); details in Section 4.10 of the Privacy Notice.

3. What does the Website use?

Technology	Used?	Note
Strictly necessary storage: remembering the cookie choice (localStorage, hk3d-consent)	Yes , without consent	Holds only your choice (yes/no per category), its time and the notice version. It identifies no one and is sent to no one.
Session, language, security cookies	No	The Website serves static pages; language is chosen by link, not by cookie.
Visitor statistics: Google Analytics 4	Only with consent	Section 4
Behaviour analytics: Microsoft Clarity	Only with consent	Section 4
Ad measurement: Google Ads conversion measurement	Only with consent	Section 4

Technology	Used?	Note
Other marketing, remarketing, social-media cookies, pixels	No	
Third-party embedded content (maps, videos, social modules, external font provider)	No	We serve fonts and scripts from our own server. The scripts of the three measurement services above are loaded only after consent.
Server log	Yes	The server logs requests (IP address, time, requested page, browser type) for security and troubleshooting, for 30 days . This is not data stored on your device; see Section 4.5 of the Privacy Notice.

4. Detailed list of cookies and local storage

4.1. Strictly necessary (no consent)

Name	Provider	Purpose	Retention
hk3d-consent (localStorage)	HőKép3D (own)	Remembers the cookie choice (per category), its time and the notice version so we do not ask on every page	12 months, or until the notice version changes; then we ask again

4.2. Statistics – Google Analytics 4 (only with consent)

Provider: Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). Purpose: aggregate measurement of how the Website is visited and used (pages viewed, traffic sources, device type, approximate location; as events: quote form sent, e-mail and phone clicks, PDF downloads, calculator use with facility type and level, 3D view started). We pass **no** personal data (name, e-mail address, phone number, form text) to the measurement; personal-looking query parameters are removed from page addresses. Google Signals and ad personalisation are switched off in Google Analytics.

Name	Type	Purpose	Retention
_ga	first party (Website domain)	Pseudonymous identifier to tell visitors apart	2 years
ga<id>	first party	Stores session state	2 years

4.3. Behaviour analytics – Microsoft Clarity (only with consent)

Provider: Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland). Purpose: understanding how visitors use the pages (click and scroll maps, a masked, replayable recording of page use) to improve usability. Clarity does not record form-field contents (the quote form is masked) and handles the data pseudonymously. We do not allow ad storage for Clarity.

Name	Type	Purpose	Retention
_clck	first party	Clarity's pseudonymous user ID and preferences	1 year [confirm]
_clsk	first party	Joins page views into one session recording	1 day [confirm]
CLID , MUID , ANONCHK , MR , SM	third party (clarity.ms / bing.com)	Microsoft's own identifiers for the Clarity service and for identifier synchronisation across browsers and Microsoft sites	per Microsoft's current documentation [confirm]

4.4. Ad measurement – Google Ads (only with consent)

Provider: Google Ireland Limited. Purpose: measuring whether a click on a Google ad led to a quote request (a conversion). With your consent Google may also use the signal for advertising purposes (ad measurement, ad personalisation) under Google's own rules. Only the fact of the conversion and the ad-click identifier reach Google, not the enquirer's personal data.

Name	Type	Purpose	Retention
_gcl_au	first party	Measures ad conversions, stores the ad click	90 days

Name	Type	Purpose	Retention
_gcl_aw	first party	Stores the click identifier (gclid) received when you click an ad, to attribute the conversion; only created if you arrive from an ad	90 days

4.5. As a technical necessity of the request, Google also receives your IP address and may transfer it to a third country (United States); the safeguards are described in Section 10 of the Privacy Notice.

5. How can I give, change or withdraw consent?

5.1. On your first visit the Website shows a bar on which the **"Accept"** and **"Reject"** buttons have equal weight and size. With **"Settings"** you can decide per category (Statistics, Behaviour analytics, Ad measurement); no category is pre-ticked. Closing the bar or not deciding is not consent.

5.2. You can change or withdraw your decision at any time with the **"Cookie settings"** link in the page footer, which opens the same interface. Withdrawing is as easy as giving consent. On withdrawal (a) the Website no longer loads the service's script, (b) if it was running, the page is reloaded so that nothing keeps collecting, and (c) the Website deletes the related cookies (`_ga*` , `_gcl_*` , `_clck` , `_clsk`) on its own domain. Cookies created on a third party's domain (clarity.ms) can be deleted in your browser (Section 7).

5.3. Withdrawal does not affect the lawfulness of processing before withdrawal. You can ask for deletion of data already held by Google or Microsoft from those providers, or from the controller (Privacy Notice, Section 12).

5.4. **Record.** Your choice (yes/no per category), its time and the notice version are recorded by your browser's local storage. The choice is valid for 12 months; after that, or on a substantive change of the notice, we ask again.

6. The enquiry form

Data entered in the form are used only to answer your request (Privacy Notice 4.1). Using the form requires no cookie. If you have consented to measurement, a content-free event is generated when the form is sent successfully (only the fact, plus the selected package and facility type – no name, e-mail address, phone number or message). [if a third party handles the form, name the provider and add the link]

7. How can I delete or block cookies in my browser?

You can always view and delete stored cookies and local data in your browser, or block them. See your browser's help (Chrome, Firefox, Safari, Edge). If you block cookies the Website works unchanged. Google's browser add-on (<https://tools.google.com/dlpage/gaoptout>) can also disable Google Analytics.

8. External links

The Website may link to other sites (e.g. social profiles, sources on the Image Credits page). Those sites have their own cookie and privacy rules; we give no information about them before you follow a link.

9. If this changes in future

9.1. If in future we use further cookies or similar technologies beyond what is strictly necessary (e.g. a new measurement tool, marketing cookies, embedded video or maps), we will do so **only with your prior, express consent**, under the conditions of Section 5: clear and complete information before consent is requested; rejecting is as easy and as prominent as accepting; use does not depend on consent; consent can be withdrawn at any time as easily as it was given; a record of the choice is kept.

9.2. In that case we update this notice before switching on (names, purposes, storage periods, providers), raise the notice version so that consent is requested again, and amend the Privacy Notice.

10. Contact

For questions or comments: info@hokep3d.hu. The controller's details are in Section 1 of the Privacy Notice and the Website provider's details in the Imprint. You may also complain to the Hungarian National Authority for Data Protection and Freedom of Information (NAIH, <https://www.naih.hu>).

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