

PRIVACY NOTICE

in connection with general data processing related to “Relaxie” services

Table of contents

1. Data controller	1
2. Personal data processed	2
3. Additional recipients and data processors	15
4. General data security measures	16
5. Rights of data subject.....	17

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This Privacy Notice summarizes the data processing activities generally carried out by the **Relaxie International Kft.** (seat: H-5904 Orosháza, Aranyeső str. 22.; hereinafter referred to as: '**Data controller**' or '**Controller**') in relation with persons establishing a membership in respect of participation in the “Relaxie” program provided by it and the use of the services provided in connection therewith (Filipino nationals), as well as persons interested in the service and visitors to the www.rxie.eu website (hereinafter: "**Data subject**").

Please read this Privacy Notice carefully and, if you have any questions regarding the processing of your personal data, do not hesitate to contact us through any of the contact details provided below.

1. Data controller

Data controller: **Relaxie International Kft.**

Seat: 5904 Orosháza, Aranyeső utca 22.

Address: 5904 Orosháza, Aranyeső utca 22.

Represented by: Farkas Adrián, managing director

E-mail: hello@rxie.eu

2. Personal data processed

Data processing activity	Purpose of data processing	Legal basis for data processing	Categories of personal data processed	Duration of data processing	Recipients with whom the data are shared	Measures taken to ensure data security
Contact and responding to enquiries, request for quotation (on any platform)	The purpose of the data processing is to enable the Controller to contact you, respond to the questions you submit through the contact details provided, provide a quotation, and remain in contact with you where necessary.	Your consent, Article 6(1)(a) GDPR; in the case of a contractual request, preparation for the conclusion of a contract, Article 6(1)(b) GDPR.	Name, contact e-mail address, and, where applicable, mailing address and telephone number, subject matter, and the requests formulated.	The Controller processes the personal data until your question or request is answered, and then irreversibly deletes them. In the case of a request for quotation, the Controller retains the personal data for a period of 5 years from their collection, corresponding to the civil law limitation period.	No data disclosure takes place; however, in the case of an enquiry submitted through the website, the personal data may be shared with the website hosting service provider.	The Controller handles the stored personal data in a closed manner; access is granted only to those staff members who respond to the question. In the event of any telephone call received by the Controller, the Controller shall in each case request separate consent in order to continue storing the personal data provided by the caller.

Ensuring and enabling registration and participation in the discount program	The purpose of the data processing is to enable you to create your own personal account by registering on the website, so that your eligibility for the discount program can be verified and, accordingly, you may use the service. By registering and through the identification of your OFW status during registration, you can establish your membership relationship and the user profile necessary for it.	Steps prior to the conclusion of a contract, Article 6(1)(b) GDPR.	E-mail address and OWWA e-card identification number (OWWA ID)	The Controller processes the data during the existence of the membership until its termination.	The personal data may be shared with the website hosting service provider. The data necessary for verification may be transmitted or made accessible to the consulate of the relevant foreign state and/or its verification system for the purpose of verification of identification, solely to the extent necessary for carrying out the eligibility check. The data are verified through the Overseas	Verification of the identifier is carried out automatically through an API connection: the Controller transmits only the characters necessary for the eligibility check to the verification system, which provides feedback exclusively on the validity of the identifier; therefore, the Controller does not carry out independent personal identification and does not process more data than necessary for the verification. The Controller does not make copies of the cards.
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					Workers Welfare Administration (OWWA), the organization responsible for the administration and registration of OWWA cards.	
Data processing in connection with certain discounts, ensuring the use of discounts	For certain discounts provided by the Controller within the framework of the membership, the Controller processes additional data, in particular in the case of labor recommendation, in order to assess the sector to which the Data Subject should be recommended, while in the case of re-training, in order to be able to recommend an appropriate	Performance of a contract, Article 6(1)(b) GDPR.	In the case of labor recommendation: name, date of birth (for the purpose of assessing an adult worker), gender, name of current/former employer, CVs, information relating to qualifications. In the case of providing training: name, information relating to qualifications.	The Controller processes the data during the existence of the membership, until its termination.	The Controller transfers the personal data to its partners providing the training, as well as to its labor placement and temporary agency work partners. The partner processes the data transferred to it as an independent controller, in accordance with its own	The Controller minimizes the personal data with regard to the principle of data minimization. For the purpose of determining age, the Controller processes only the date of birth. Furthermore, all personal data are processed or transferred exclusively for the intended purpose, depending on the discount used by the Data Subject. The Controller transfers

	training institution to the Data Subject and to enable the re-training to take place in accordance with study requirements within the EU.				Privacy Notice and internal rules and is independently responsible for its own data processing.	personal data exclusively to reliable partners with whom it has a contractual relationship, subject to prior information and appropriate security measures.
Contacting Data Subjects, needs assessment before expiry of OFW status	The Controller contacts the Data Subject by e-mail, typically 6 months before the expiry of the OFW status (2 years), for the purpose of assessing membership, access to the discount program, extension, and other user needs, as well as preferences and intentions.	Legitimate interest of the Controller, Article 6(1)(f) GDPR.	Name, e-mail address, date of entry into the EU (due to the expiry of the OFW status), and the needs formulated in the needs assessment form.	Until the expiry of the OFW status.	Data provided during the needs assessment shall be transferred to a third party only if this is necessary for providing the discount requested by the Data Subject, exclusively to the extent necessary for the fulfilment of the given purpose, for example to labor	The Controller carries out the automatic contact process prior to the expiry of the identifier in a closed, access-controlled system; the contact is based exclusively on the expiry date and the data necessary for maintaining the membership, notifications are sent in an automated and logged manner, and access to the Data Subject's data is granted only to

					placement and temporary agency work partners.	persons authorized to do so.
Organization of contests	The purpose of the data processing is to identify the participants of the contest, draw the prize, and subsequently hand over the prize.	Performance of a contract, Article 6(1)(b) GDPR.	Name, contact details, and delivery details of the winner and substitute winner.	The Controller processes the personal data in respect of winners for a maximum period of 5 years from the handover of the prize, and in all other cases — in respect of non-winners and substitute winners — until the handover of the prize.	No data disclosure takes place.	The Controller collects delivery details exclusively from the winner and substitute winners. The Controller handles the stored personal data in a closed manner; access is granted only to authorized persons responsible for the relevant task.
Taking photos and videos, publication of photos and videos on the website and on social media (primarily of contests)	The purpose of the data processing is to present and promote the Controller's contests, events, and activities, and, following the prize draw, to demonstrate that the	Your consent, Article 6(1)(a) GDPR.	Photo	No later than 5 years from the recording of the photo.	The photos and videos may also be taken by the Controller's partner on behalf of the Controller, for example a	The Controller uploads data only to platforms in respect of which it considers data protection to be guaranteed. Only pre-screened photos are uploaded. The

	prize has been received.				photographer or videographer. The photo or video may be shared with the providers of social media platforms (Facebook, Instagram – META Platforms Ltd.; TikTok – ByteDance; LinkedIn – Microsoft) and may also be published on the Controller's own website (hosting service provider).	Controller does not make any recording to which the Data Subject has not consented.
Determination, fulfilment and recording of the one-time credit related to the use of a Discount	Verification of the conditions of the credit, determination of eligibility, fulfilment of the credit, verification of	Performance of a contract, Article 6(1)(b) GDPR In the case of compliance	Name, e-mail address, time of registration, time of use of the Discount, payment data necessary for	Until fulfilment of the credit, or, in the case of accounting requirements,	Wise Europe SA, Rue du Trône 100, box 3, 1050 Brussels, Belgium, https://wise.co	The Controller handles the stored personal data in a closed manner; access is granted only to authorized

	fulfilment, and ensuring one-time use.	with accounting obligations: compliance with a legal obligation, Article 6(1)(c) GDPR, pursuant to Section 169 of Act C of 2000 on Accounting	the credit (transaction identifier, banking data).	payment data for 8 years.	m/gb/legal/privacy- notices , or another payment service provider may process the payment data in accordance with its own internal rules, as well as the accountant in charge from time to time.	persons responsible for the relevant task, and the data are disclosed to the competent authority exclusively upon official request.
Handling consumer complaints	Ensuring the submission of consumer protection complaints and claims, responding to them, assessing them, and recording them in minutes.	Compliance with a legal obligation, Article 6(1)(c) GDPR Legal basis: Section 17/A (5) and (7) of Act CLV of 1997 on Consumer Protection.	Name, address, e-mail address, content of the complaint, time of submission of the complaint, date of the minutes, content of the documents forming part of the complaint, complaint identifier, and signature of the	For 3 years from the date of the minutes.	To the competent consumer protection or other authority, on a case-by-case basis.	The Controller handles the stored personal data in a closed manner; access is granted only to authorized persons responsible for the relevant task, and the data are disclosed to the competent authority exclusively upon official request.

			person taking the minutes.			
Handling consumer warranty claims	Ensuring the submission of consumer protection warranty and guarantee claims, responding to them, assessing them, and recording them in minutes.	Compliance with a legal obligation, Article 6(1)(c) GDPR. Legal basis: Section 4 of NGM Decree No. 19/2014 (IV.29.).	Name, address, date of performance, date of notification of the defect, description of the defect, the right to be enforced and the method thereof, content of the response, nature of the service, and signature of the person taking the minutes.	For 3 years from the date of the minutes.	To the competent consumer protection or other authorities, on a case-by-case basis.	The Controller handles the stored personal data in a closed manner; access is granted only to authorized persons responsible for the relevant task, and the data are disclosed to the competent authority exclusively upon official request.
Data processing related to sending newsletters	Promoting the Controller's services, products, activities and program, and maintaining contact for this purpose, specifically by sending newsletters.	Your consent, Article 6(1)(a) GDPR.	Name, e-mail address.	Until withdrawal of consent (unsubscribe from the newsletter).	The personal data are shared with the service provider used for the newsletter sending service.	The Controller handles the stored personal data in a closed manner; access is granted only to staff members responsible for the relevant task.

Data processing related to the use of cookies on the website	Recording the acceptance of cookies used on the website, ensuring browsing and the session on the website, supporting and analyzing its traffic and use.	Your consent, Article 6(1)(a) GDPR. In relation to cookies essential for the use of the website, the legitimate interest of the Controller, Article 6(1)(f) GDPR.	IP address, as well as other personal data stored by individual cookies, for example the start and end time of the visit, in certain cases the type and language of the browser and operating system, device parameters, settings provided by the user, and pages visited. In the case of the Chrome browser, the current list of cookies can be checked by clicking the “More tools” and “Developer tools” buttons in the right corner of the website. Personal data are shared	Cookies essential for the use of the website are automatically deleted upon closing each session; functional cookies are stored until tracking is stopped.	As a general rule, no data disclosure takes place; however, when visiting the website, other service providers may also install cookies on the Data Subject’s computer for the purpose of analysis, collection of statistical data and remarketing. In this context, Google also processes your data. Data related to cookie management may be shared with the hosting service	During the operation of its IT systems, the Controller ensures the necessary access management, internal organizational and technical solutions so that your data cannot come into the possession of unauthorized persons.
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			with Google Ireland Ltd. through statistical and marketing cookies in connection with the use of the Google Analytics service.		providers of the websites.	
Performance measurement of affiliate offers and CJ Affiliate tracking	To determine whether the data subject accessed the website of a partner or advertiser through an affiliate link displayed on the Relaxie website and subsequently completed a purchase, registration or another commissionable action. The purpose of the processing is to attribute clicks and conversions to	The use of CJ's non-essential cookies and other tracking technologies involving access to the user's device is based on the data subject's prior consent pursuant to Article 6(1)(a) of the GDPR and Section 155(4) of Act C of 2003 on Electronic Communications.	Cookie and device identifiers, IP address, browser type and version, user agent string, approximate geographical location determined on the basis of the IP address, click and advertisement impression data, timestamps, referring and current website URLs, affiliate and transaction identifiers, the date	Depending on the type of cookie concerned, CJ's service cookies remain active for the duration of the browsing session or for a maximum period of 13 months. Following the withdrawal of consent, no new consent-based CJ tracking may be initiated. CJ may retain pseudonymised personal data	Epsilon International UK Ltd. (CJ Affiliate), companies belonging to the Publicis Groupe of which CJ forms part, advertisers participating in the affiliate programme, and CJ's technical service providers and processors. Relaxie may receive aggregated or pseudonymised	According to CJ, it applies appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The personal data processed by CJ is pseudonymised. Relaxie activates consent-based CJ tracking technologies only after valid

	affiliate links, calculate the commission payable to Relaxie, prepare performance reports and statistics, and prevent fraudulent activity.	CJ processes the pseudonymised personal data obtained in this manner as an independent controller on the legal bases specified in its own privacy policy, primarily on the basis of its legitimate interests.	and time of an order or other conversion, and pseudonymised data relating to the category and value of the product purchased or service used. According to CJ, directly identifying information—such as names, email addresses or telephone numbers—is not processed for the purposes of affiliate measurement.	previously obtained lawfully for a maximum period of six years in accordance with its own data retention policy. Deletion may be requested separately through CJ's data subject request portal.	performance and transaction reports from CJ. CJ's controller is established in the United Kingdom. Personal data may be transferred to the United Kingdom on the basis of the adequacy decision adopted by the European Commission. CJ's servers are located in the United States, and its processors may operate in several countries, including the United States and India. According to CJ, appropriate safeguards	consent has been obtained.
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					are applied to such transfers, including, in particular, the Standard Contractual Clauses adopted by the European Commission.	
Retention of documents beyond the period of contract performance in order to facilitate evidence in potential legal proceedings	In the case of certain data processing activities specified in this notice, the Controller retains the documents for a period of 5 years following the termination of the contract, in order for the data contained in the documents to serve as evidence in any potential legal proceedings.	Legitimate interest of the Controller, Article 6(1)(f) GDPR.	Personal data included in contracts and offers.	Until the expiry of 5 years from the termination of the contract or other legal basis for data processing.	Data may be disclosed if the Controller uses the documents in any proceedings.	The Controller handles the stored personal data in a closed manner, and only employees whose duties require access may access them.
Data processing necessary for conducting litigation and out-of-court proceedings, legal	Initiation of litigation and non-litigation proceedings and processes, provision of evidence	Legitimate interest of the Controller, Article 6(1)(f) GDPR.	Varies on a case-by-case basis; personal data necessary for conducting the	The personal data are retained for as long as their retention is	Data may be disclosed if the Controller uses the documents in any proceedings,	The data may be accessed only by persons who participate in the conduct of the

proceedings, and enforcement of claims	in such proceedings and collection of outstanding debts.		given proceedings.	necessary for the initiation, conduct, or completion of the given proceedings or for the collection of the claim.	including to authorities, an attorney-at-law, or a debt collection company.	proceedings or who have a legitimate interest in the conduct of the proceedings.
Data processing related to the exercise of Data subjects' rights	For the purpose of fulfilling requests made in connection with the exercise of Data subjects' rights	Compliance with a legal obligation, Article 6 (1) (c) of the GDPR based on: Articles 15–21 of the GDPR	Data necessary to identify the Data subject and to maintain contact with them, such as name, telephone number, and email address	Until the request made in the course of exercising the Data subject's rights have been fulfilled	No data disclosure takes place	Only authorized employees have access to personal data.
Data processing related to consent and acceptance declarations	Verification, in the interest of the Controller, of whether consents have been given or not given, and whether the GTC and the Notice have been accepted or not accepted. It is in the legitimate interest of the Controller to be	Legitimate interest of the Controller, Article 6(1)(f) GDPR.	Technical and system data, as well as data relating to the making of the consent and acceptance declaration (the fact and time of giving it).	Until withdrawal of consent, or until completion of the data processing underlying the consent or acceptance.	The hosting service provider may potentially have access to technical, system, or log data.	The Controller handles the stored personal data in a closed manner; access is granted only to the person responsible for the relevant task, also with regard to the principle of data minimization. Acceptance and consent declarations

	able to prove, during the use of the Webshop, that you have read and accepted the GTC and this Notice, or, where necessary, have given your consent.					are given by means of a selectable checkbox, and the Controller does not directly link them to personal identification data.
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3. Additional recipients and data processors

In addition to the cases listed in the above table, the Controller may transfer the personal data you have provided to the competent authority, court, or applicant in the event of an official or judicial request, or if justified for the protection of the rights and freedoms of the Controller or others. Should such a transfer occur, the Controller will inform you immediately, unless such notification is prohibited by law or an official decision.

The Controller uses the hosting service provided by Amazon Web Services EMEA SARL (ARNOLDGLEIS 1, 60388 Frankfurt am Main, Germany, <https://aws.amazon.com/privacy/>) as the hosting service for the website and for the cloud-based storage of personal data, through the Amazon Web Services (AWS) cloud/hosting service; therefore, all personal data are shared with this service provider.

When visiting websites, other service providers may also install cookies on your computer for the purpose of analysis, collection of statistical data, and remarketing. In this context, Google (Google Ireland Ltd.) may also process your data in accordance with its own privacy rules.

In relation to the newsletter sending service, the Controller uses Brevo SaS (7 rue de Salneuve, 75017 Paris, France, <https://www.brevo.com/legal/privacypolicy/>), with whom personal data are shared in this connection.

The Controller uses the CJ Affiliate marketing service to measure the performance of certain partner offers and links displayed on the website. The service is provided by Epsilon International UK Ltd. (company number: 03610044; registered office: 1st Floor, 2 Television Centre, 101 Wood Lane, London, W12 7FR, United Kingdom; hereinafter: "CJ").

CJ may process pseudonymised data using cookies, pixels, tags, redirect links and other similar tracking technologies to determine whether a click, purchase, registration or other conversion is attributable to an affiliate link published by Relaxie. CJ carries out such processing as an independent controller for its own purposes and in accordance with its own data protection terms.

The data processed by CJ may include, in particular, the IP address, cookie and device identifiers, browser and device information, clicks, impressions, timestamps, referring and destination page URLs, approximate geographical location, affiliate identifiers and pseudonymised transaction data relating to affiliate conversions. According to CJ, directly identifying information—such as names, email addresses or telephone numbers—is not processed as part of the service.

CJ may transfer data to the United Kingdom, the United States and the countries in which certain of its processors operate, including India. According to CJ, appropriate safeguards are applied to such transfers, including, in particular, the Standard Contractual Clauses adopted by the European Commission.

CJ's Services Privacy Policy is available here: <https://www.cj.com/legal/privacy-policy-services-uk>

The list of cookies that may be used by CJ is available here: <https://www.cj.com/legal/cookie-list>

The portal for submitting access and deletion requests relating to data processed by CJ is available here: <https://www.cj.com/dsr>

For the purpose of verifying eligibility for the discounts, the Controller carries out verification through the records of the Overseas Workers Welfare Administration (OWWA Center Building F.B. Harrison St, Pasay, Metro Manila, OWWA), an agency of the Government of the Philippines serving the welfare of overseas Filipino workers (OFWs) and their dependents. The verifying authority determines whether the identifier is valid on the basis of its own verification logic and internal rules; no data processing relationship is established with the organization.

Data subjects may address data protection matters directly to the Controller.

4. General data security measures

In order to protect its systems, the Controller applies documented technical and organizational measures at its registered seat to prevent unauthorized access to data.

In order to guarantee an appropriate level of data security, the Controller has assessed the risks arising in connection with its data processing activities and evaluated them from various aspects in terms of the severity of the risks and the likelihood of their occurrence.

During the operation of its IT systems, the Controller ensures the necessary access management, internal organizational and technical solutions so that your data cannot come into the possession of unauthorized persons, and so that unauthorized persons cannot delete, export from the system, or modify the data. We also enforce data protection and data security requirements against our processors through prior assessment and data processing agreements.

When providing the discounts, the Controller cooperates exclusively with partners that apply the same high-level protection measures as the Controller in relation to their customers and their own contributors. During data transfers to partners, only partners that provide appropriate data security guarantees may be recipients, including, where applicable, organizations within the EU (DACH region), as well as compliance with the Data Privacy Framework. The Controller shall conclude a data processing agreement with any processors, where such agreement is not already in place.

We keep records of any potential data protection incidents and, where necessary, provide information about the incidents that occur.

Internet communication between the Controller and the person visiting the Controller's website is end-to-end encrypted and takes place via the HTTPS (HTTP+SSL) protocol.

The Controller applies password protection on its computers and equips its IT devices with intrusion protection.

The computers owned by the Controller are protected with appropriate passwords, and its data storage devices are destroyed on the basis of a dedicated disposal protocol.

5. Rights of data subject

You are entitled at any time to **request information** by post, electronically, or by telephone, using the contact details provided in this notice, about the personal data concerning you that we process.

Upon your request, we will inform you about:

- the data processed,

- the purpose of processing,
- its legal basis,
- its duration,
- who receives or has received your data and for what purpose.

The information will be provided in writing within one month of the submission of the request, either on paper or electronically, depending on the form of the request.

You may **object** to the processing of your personal data at any time. We will examine the objection within the shortest possible time, but no later than one month after its submission, decide on its merits, and inform you of our decision.

You are entitled at any time to request the **erasure** of the personal data we process, or the **rectification** of personal data recorded incorrectly.

In addition, we will **restrict** the processing of your personal data if you request it, or if, based on the information available to us, it can be assumed that erasure would harm your legitimate interests. We will process personal data that has been restricted in this manner for as long as the purpose of the processing or the legitimate interest that precluded the erasure of the personal data remains valid.

The Data subject may, via the contact details provided in this notice, request the Controller to **restrict** the processing of their personal data (with a clear indication of the restricted nature of processing and ensuring separate handling from other data) if.

- you contest the accuracy of your personal data (in this case the Controller will restrict processing for the period during which the accuracy of the personal data is verified).
- the processing is unlawful and you oppose the erasure of the data and instead request restriction of their use.
- the Controller no longer needs the personal data for the purposes of processing, but you require it for the establishment, exercise, or defense of legal claims; or
- you have objected to the processing (in this case the restriction applies for the period until it is established whether the Controller's legitimate grounds override your legitimate grounds).

You are entitled, via the contact details provided in this notice, to receive the personal data concerning you that you have provided to the Controller in a structured, commonly used, machine-readable format, and you are also entitled to **transmit** those data to another controller without hindrance from the Controller.

Requests for access, erasure, rectification, restriction, data portability, and blocking will be complied with as soon as possible, but no later than within one month, and you will be informed. If we are unable to comply with your request, you will also be informed within one month.

If the data has been transferred to another person with your consent, the recipient of the data transfer will also be notified of the necessary measures.

Where we process your personal data based on your consent, you are entitled to **withdraw your consent** at any time. You may withdraw your consent by contacting the Controller through the contact details provided in this notice, and where otherwise justified, the Controller will ensure that you may withdraw your consent to data processing by simpler means.

If you are visually impaired or elderly, you may request the Controller, via the contact details provided in this Privacy Notice, to provide the content of the Privacy Notice in Word (text) format or in a large-print version.

You are also entitled to **apply a complaint** to the
National Authority for Data Protection and Freedom of Information
1055 Budapest, Falk Miksa utca 9-11.
www.naih.hu,
Phone: +36 (1) 391-1400
E-mail: ugyfelszolgalat@naih.hu

or to **enforce your rights** relating to the processing of personal data before a court having jurisdiction and competence under Act CXXX of 2016 on the Code of Civil Procedure.

You can find the competent court at the following link:

<https://birosag.hu/birosag-kereso>

You may exercise the rights listed in this notice at any time by contacting the Controller by e-mail or otherwise in writing. In connection with your request, you may be asked to identify yourself or provide other data relating to you which serve to verify your entitlement. Requests will be handled in the manner specified in the “Contact” section of this Privacy Notice.

You may contact the Controller through the contact details set out in Section 1.

Relaxie International Kt.
Data Controller