

PRIVACY POLICY

Last Updated: 01. december 2025.

1. Introduction

Welcome to **www.pnpinsulation.com**. We are committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal data in compliance with the **EU General Data Protection Regulation (GDPR)** and the **Law of the Republic of Moldova on Personal Data Protection**.

2. Who Are We? (The Data Controllers)

Your personal data is processed jointly by the following two entities (hereinafter referred to as "we", "us", or "the Companies"):

1. PNP Orange Kft.

- **Registered Office:** Fehérvári út 28-14, H8100 Várpalota, Hungary
- **EU Member State:** Hungary (GDPR applies)

2. Orange Tower s.r.l.

- **Registered Office:** str. A. Bernardazzi, 19, MD3601 Ungheni, Moldova
- **Non-EU Country:** Republic of Moldova

Both entities act as **Joint Controllers** of your personal data in connection with the operation of this website and the production and sales of thermal insulation products, other building materials, and supportive services.

3. What Data Do We Collect?

We may collect and process the following categories of personal data:

- **Identity Data:** Name, surname.
- **Contact Data:** Email address, phone number, billing/site address.
- **Property Data, message content:** Information shared by visitors regarding the property where insulation tasks occur, and other information or questions shared with us, which may be linked to your identity.
- **Technical Data:** IP address, browser type, and cookies (see our Cookie Policy).

4. Why Do We Process Your Data? (Purpose and Legal Basis)

We process your data for specific purposes based on legal grounds:

Purpose	Legal Basis (GDPR Art. 6 & Moldovan Law)
To provide quotes and perform services (Sales of thermal insulation products, other building materials, and supportive services.)	Contract: Processing is necessary to fulfill a contract or to take steps at your request before entering into a contract.

To communicate with you (Answering inquiries via forms/email)	Legitimate Interest or Consent: Depending on how you contacted us.
Marketing & Newsletters (Sending offers, news)	Consent: Only if you have explicitly subscribed. You can withdraw this at any time.
Legal Compliance (Invoicing, tax obligations)	Legal Obligation: Compliance with Hungarian and Moldovan tax laws.

5. Data Transfers (Hungary ↔ Moldova)

As we operate in both Hungary (EU) and Moldova (Non-EU), your data may be transferred between our offices.

- **Transfer Safeguard:** Moldova is currently not subject to a full EU "Adequacy Decision." Therefore, we protect your data during transfer using **Standard Contractual Clauses (SCCs)** approved by the European Commission, ensuring that the Moldovan entity respects GDPR standards.

6. Data Retention

We retain your personal data only as long as necessary:

- **Inquiries/Quotes:** 1 year after the last communication if no contract is signed.
- **Contractual Data (Invoices/Warranties):** 8 years (or as required by Hungarian/Moldovan accounting laws).
- **Newsletter Data:** Until you unsubscribe.

7. Your Rights

Under GDPR and Moldovan Law, you have the right to:

1. **Access:** Request a copy of the data we hold about you.
2. **Rectification:** Correct inaccurate data.
3. **Erasure ("Right to be Forgotten"):** Request deletion of your data (unless we are legally required to keep it, e.g., for tax purposes).
4. **Restriction:** Limit how we use your data.
5. **Portability:** Receive your data in a structured, commonly used format.
6. **Object:** Object to processing based on legitimate interests.
7. **Withdraw Consent:** Unsubscribe from newsletters at any time.

To exercise these rights, please contact us at: [\[info@pnpinsulation.com\]](mailto:info@pnpinsulation.com)

8. Complaints

If you believe your data rights have been violated, you have the right to lodge a complaint with the supervisory authority:

- **In Hungary:** Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) - *naih.hu*
- **In Moldova:** Centrul Național pentru Protecția Datelor cu Caracter Personal (CNPDCP) - *datepersonale.md*