

SCHWUNG CNC

PRIVACY NOTICE

Effective from: 14 July 2026

Scope: <https://cnc.schwung.hu> and the services of the Schwung CNC platform

Validity and updates

This Privacy Notice describes the processing of personal data within the current Schwung CNC platform. It will be updated when the services, technologies, processors or applicable legal requirements change.

1. Data controller

Item	Details
Controller	Schwung Energy Kft.
Registered office	2900 Komárom, Báthory I. u. 24/B, Hungary
Tax number	14462722-2-11
Company registration number	11-09-014309
Managing director	András Dömötör
Email	info@schwung.hu
Telephone	+36 30 288 2867
Website	https://cnc.schwung.hu
Privacy contact	No data protection officer has currently been appointed. Privacy requests may be sent using the contact details above.

2. Purpose and scope

Schwung CNC is a European B2B platform connecting customers with CNC manufacturing partners. This Notice applies to visitors, customer and manufacturing partner accounts, their contact persons, participants in requests and quotations, and business contacts whose publicly available professional details are processed for targeted business outreach.

Technical drawings and manufacturing documents may constitute trade secrets or confidential information. Their protection is governed by access rules, the platform terms and, where appropriate, non-disclosure agreements in addition to data protection law.

3. Processing activities

3.1 Website operation, sessions and security logs

Data	Purpose and legal basis	Retention
IP address, date and time, requested page, browser and device information, errors and security events	Operation, troubleshooting, IT security and abuse prevention. Article 6(1)(f) GDPR: legitimate interest in operating a secure platform.	Standard server logs: 90 days. Security incident or legal claim records: until the related procedure or claim is concluded.
Session identifier and cnc_lang language setting	Login, secure sessions and remembering the selected language. Article 6(1)(b) and (f) GDPR; technically necessary function.	Session: until the session ends. Language cookie: 180 days.

3.2 Customer account and company profile

Data	Purpose and legal basis	Retention
Company name, username, email address, password hash, role, account status and login details	Registration, identification and permission management. Article 6(1)(b) GDPR; for corporate representatives and account security, Article 6(1)(f) GDPR.	For the lifetime of the account. Authentication data is deleted within 30 days of account closure; transaction and legal-claim records may be retained for up to 5 years.
Company address, country, website, tax/EU VAT number, industry, language and notes	Identification of the business partner and preparation of the service or contractual relationship. Article 6(1)(b) or (f) GDPR. Pure company data is not always personal data.	For the business relationship and afterwards to the extent required for legal claims.
Contact name, position, email, telephone, language and primary-contact flag	B2B communication and management of requests. Article 6(1)(f), and where applicable Article 6(1)(b) GDPR.	Until the contact role or business relationship ends; transaction-related records until the end of the claim period.

3.3 Manufacturing partner account, machinery and capacity

Data	Purpose and legal basis	Retention
Account, company, contact, language and permission details	Operation of the manufacturing partner account and communications. Article 6(1)(b) and (f) GDPR.	For the account and partner relationship; authentication data for 30 days after closure and transaction records for up to 5 years.
Machine manufacturer and type, number of machines, axes, working envelope, processes, excluded materials, description, workforce size, free hours and period	Presentation of technical suitability and free capacity and decision-support matching. Article 6(1)(b) and (f) GDPR; mostly business data.	Current profile data until amended or deleted; transaction-related data until the end of the legal claim period.

3.4 Requests and technical documents

Data	Purpose and legal basis	Retention
Contact details, process, dimensions, quantity, deadline, destination country,	Recording, reviewing and matching the request and managing quotations. Article	Closed request without an order: metadata for 12 months. Successful order: 5 years

quality, logistics and other requirements	6(1)(b) GDPR; for corporate representatives Article 6(1)(f) GDPR.	from performance or until a related dispute ends.
PDF, STEP/STP, DXF, DWG, IGES/IGS, ZIP, JPG/JPEG and PNG files; original and technical filename, type, size, path and upload date	Technical review, quotation preparation and manufacturing coordination. Article 6(1)(b) and (f) GDPR; files normally contain trade secrets and may exceptionally include personal data.	Unsuccessful, withdrawn or non-contractual request: deletion within 180 days. Order: up to 5 years where technical documentation or legal claims require it.
Confidentiality level, invitations and access permissions	Determining which registered manufacturing partners may view the request and documents. Article 6(1)(b) and (f) GDPR and contractual confidentiality duties.	In line with the request and access-log retention period.

3.5 Quotations and evidence of declarations

Data	Purpose and legal basis	Retention
Quotation, supplier, contact person, signatory name and email, timestamp, document hash, IP address and browser identifier	Submission of the quotation, proof of the declaration and document version, prevention of disputes and abuse. Article 6(1)(b) and (f) GDPR.	5 years after the quotation or contractual relationship ends, or until a pending dispute is concluded.

3.6 Communication and support

Data	Purpose and legal basis	Retention
Name, company, email, telephone, message and communication content	Responding to enquiries, communication in German, support in selecting a manufacturing partner and process coordination. Article 6(1)(b) or (f) GDPR; separate marketing only under Article 6(1) (a).	General enquiry: 1 year after the last substantive communication. Transaction-related communication: 5 years from performance.

3.7 Researching potential business partners from public sources

Schwung CNC may collect professional contact details of potential CNC manufacturing partners and customers from publicly available company websites, official registers, Google Business/Maps and other public B2B sources. This Notice is made available in the first communication.

Data	Purpose and legal basis	Source and retention
Company, website, public business email and telephone, postal address, contact name and position, country, language and source URL	Targeted B2B outreach and development of the partner network. Article 6(1)(f) GDPR: legitimate interest. The individual may object at any time.	Public business sources. Unsuccessful contact: no more than 12 months. Following an objection, contact details are deleted; minimum suppression-list data may be retained for 5 years to prevent further contact.

3.8 Commission invoicing

Data	Purpose and legal basis	Retention
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Invoice name and address, tax information, invoice, performance, payment and related contractual records	Settlement of the success commission payable by the manufacturing partner, accounting and legal claims. Article 6(1)(b) and (c) GDPR.	Accounting records for at least 8 years; other contract records generally until the end of the legal claim period.
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4. Recipients, access control and confidentiality

- Authorised employees and contractors of Schwung Energy Kft. only to the extent required for their duties.
- Registered manufacturing partners only in accordance with the confidentiality and access level selected by the customer.
- The customer in relation to submitted quotations and the necessary details of the manufacturing partner making the quotation.
- Authorities, courts, accountants, legal advisers or professional providers where required by law or necessary for the relevant matter.

A manufacturing partner does not automatically receive access to all drawings. Access is restricted by the confidentiality level, an invitation and server-side user permissions.

5. Processors and external services

Service	Provider	Processing
Hosting, database, file storage, server logs, backup and domain email	VPS4You Kft., 9400 Sopron, Tó utca 5, Hungary; tax number 32064526-2-08; company registration number 08-09-034904	Platform data is processed in a data centre in Budapest, Hungary.
Map display	Google Maps / Google Ireland Limited	When the contact map loads, the IP address and technical data may be transmitted to Google; Google's privacy terms apply.
Content delivery network	jsDelivr for Bootstrap CSS and JavaScript	The IP address, request time and technical request data may be processed when the files are downloaded.
Email, accounting and invoicing	Domain-related mail server and the contracted accounting and invoicing services	Only data required for communication, invoicing and statutory accounting; specific recipients are available on request.

6. Transfers outside the EEA

Schwung CNC's own web, database and file data is processed in the Hungarian infrastructure of the hosting provider. Google Maps and the CDN may process technical data through infrastructure outside the European Economic Area. Such processing is subject to the provider's published transfer mechanism and privacy terms, including an adequacy decision or appropriate safeguards under the GDPR.

7. Cookies

Cookie	Purpose	Duration and consent
PHP session cookie	Login, session and security functions	Until the session ends; technically necessary

		and no separate consent is required.
cnc_lang	Remembering the selected language	180 days; functional user preference.
Analytics and marketing cookies	No active analytics or marketing cookies were identified in the current source code	Prior consent and an update to this Notice are required before introduction.

8. Decision-support matching

The platform may calculate a compatibility score and ranking using the request and the machinery, technology and capacity details of manufacturing partners. This is decision support only. It does not create a contract, replace technical or commercial review, or result in a final automated rejection. The manufacturing partner decides whether to quote and the customer chooses between quotations.

The current service therefore does not carry out a solely automated decision under Article 22 GDPR that produces legal effects or similarly significantly affects an individual.

9. Data security

- Passwords are stored using a modern one-way hash.
- Role- and permission-based access to customer, partner and administration areas.
- Restrictions on permitted file types and sizes and storage under technical filenames.
- Server-side authorisation checks for access to confidential files.
- Backups, updates, access reviews, logging and an incident-response procedure.

10. Rights of individuals

- access to and information about personal data;
- correction of inaccurate and completion of incomplete data;
- erasure or restriction where no legal or claim-related reason prevents it;
- objection to processing based on legitimate interests, particularly targeted business outreach;
- data portability where the GDPR conditions apply;
- withdrawal of consent for the future where processing is based on consent;
- complaint to a supervisory authority and judicial remedy.

Requests may be sent to info@schwung.hu or by post to Schwung Energy Kft., 2900 Komárom, Báthory I. u. 24/B, Hungary. The controller normally responds within one month; the period may be extended by two months under the conditions of the GDPR.

11. Complaints

Hungarian supervisory authority (NAIH):

- Nemzeti Adatvédelmi és Információszabadság Hatóság
- Address: 1055 Budapest, Falk Miksa utca 9–11., Hungary
- Postal address: 1363 Budapest, P.O. Box 9, Hungary
- Email: ugyfelszolgalat@naih.hu
- Telephone: +36 (1) 391-1400
- Website: <https://www.naih.hu>

Individuals may also complain to the data protection authority of their habitual residence, place of work or the place of the alleged infringement and may seek a judicial remedy.

12. Personal data breaches

The controller investigates and documents personal data breaches. Where a breach is likely to result in a risk to individuals' rights and freedoms, the competent supervisory authority will, where feasible, be notified within 72 hours of awareness. Where the risk is high, affected individuals will also be informed without undue delay unless a GDPR exception applies.

13. Legal framework and changes

- Regulation (EU) 2016/679 (GDPR), in particular Articles 5–6, 12–22, 24–25 and 32–34.
- Hungarian Act CXII of 2011 on informational self-determination and freedom of information.
- Hungarian Act CVIII of 2001 on electronic services.
- Hungarian Accounting Act C of 2000 and Hungarian Civil Code Act V of 2013.

The current version is available at cnc.schwung.hu. Registered users will also be informed of material changes on the platform or by email.