

# PRIVACY STATEMENT

The purpose of this statement is to provide you with relevant information, as well as Data-Vita Ltd.'s (hereinafter „**Company**”) policy of data protection and data processing. Our objective is to comply with the applicable requirements in the course of our data processing, and to ensure that our customers are assured when it comes to entrusting us with their personal data.

Data protection is very important to us, and we wish to be transparent about how we collect and use your personal data. Please read this statement thoroughly and contact us if you have any questions or queries.

## 1. Definitions

- „*Personal data*” means any information relating to an identified or identifiable natural person („data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- „*Data processing*” means any operation or set of operations, performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- „*Controller*” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- „*Processor*” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- „*Consent*” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- „*Protest*”: Statement by the affected person to object to the processing of his or her personal data and to request the termination of data management and the deletion of the managed data.
- „*Personal data breach*” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- „*Biometric data*” means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- „*Data concerning health*” means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status

## **2. Principles relating to data processing**

Our Company data processing principles are the following:

1. Your personal data will be processed in accordance with the provisions of this statement and the applicable laws („lawfulness, fairness”).
2. We will do everything that can be reasonably expected in order to make the processing of your personal data transparent, and we are at your service if any questions arise („transparency”).
3. We collect data for specified, explicit and legitimate purposes only and data are not further processed in a manner that is incompatible with those purposes. Data collected by us are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed („data minimization”). We make sure that data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
4. Our Company does everything it can to ensure that data are accurate and, where necessary, kept up to date; our Company takes reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay („accuracy”).
5. Data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures („integrity and confidentiality”).

## **3. Purpose of processing personal data, legal base**

Our Company processes data:

1. based on priorly informing you and asking your consent; we handle the data (collect and store data) only to the required extent and in every case, only for given purposes;
2. in certain cases, data processing is mandatory, and we base such data processing on regulations; if such cases occur, we inform you about it;
3. in certain cases, it is in the legal interest of our Company or of a third party to process data, for instance, for ensuring the security or the updating of our webpage or webshop.

Our main purpose of processing data is the contractual performance of the contracted services, thus informing the clients and promoting good quality performance on time. Data processing related to the services of our Company is based on voluntary consent, and personal data come directly from the client.

The legal basis of the processing of personal data is the consent of the data subject, in particular regarding the Act CXII of 2011 on “Informational Self-Determination and Freedom of Information” on certain aspects of information society services.

**This *Privacy Policy* applies solely to information collected by us through our services.**

#### 4. Data our Company processes, duration

In case of contracting:

Personal identification data (family name, surname, birth name, title, mother's name, place and date of birth), business-related data (tax number) and reachability (phone number, e-mail, home address), also other data that may have been provided (e.g. webpage).

In case of web-based inquiry:

Personal identification data (family name, surname) and reachability (phone number, e-mail, web page – these are optional).

In case of visiting our webpage:

Our [www.data-vita.com](http://www.data-vita.com) webpage can be freely visited, no personal data are requested. It is not our aim to identify our visitors, your personal data will be asked only in case you intend to send us a message. In addition, we do not collect any data regarding the visit at present (no cookies are used).

Our Company manages the data provided for marketing purposes until withdrawal of the consent.

#### Data privacy and Research

Our Company may provide *research*, such as data analysis and data mining, as a *service* for clients. When it comes to research, our Company acts as a *Processor* for its clients (*Controllers*), and does not collect data.

Our Company uses only aggregate and other anonymous data, free from any personal information. Anonymous data is created by removing all information that makes the data personally identifiable. Proper anonymization is the responsibility of the client (*Controller*), therefore, privacy policy of the client shall apply.

Our Company may analyze the anonymous and potentially aggregate data, provided by third-party clients. Typical client's aims are to understand and improve services, to develop new services, and for other lawful business purposes.

For further information related to data processing, please contact us by email: [info@data-vita.com](mailto:info@data-vita.com) or by our postal address. We answer your letter preferably within 1 week (in no more than 1 month).

#### 5. Information related to our webpage

##### *What are the cookies?*

Cookies are small text files that are placed to your computer via your browser such that the browser stores the cookies on your hard disk. The main purpose of a cookie is to identify users and possibly prepare customized web pages or to save site login information for you.

The most often used browsers (Chrome, Firefox) accept and permit downloading and using cookies, yet, it depends on you whether with the help of setting the browser, you deny them, or you may even delete the cookies stored on your computer. Further information about the use of cookies is given through the *Help* menu of various browsers, also you may consult <http://www.cookiecentral.com>.

There are some cookies that may not require your prior consent. You receive information about these on your first visit to the webpage (such cookies are for example the multimedia-player, or user-centric

security cookies). You get notification about those cookies which require your consent at the moment you visit the webpage – if data processing commences once you visit the webpage – and therefore, your consent is asked. It is not obligatory to accept cookies; however, the webpage may not work in the expected way.

#### *The Use of Google Analytics and Google AdWords Programs*

Google Analytics is primarily used for statistical purposes, among others, with its help the effectiveness of campaigns can be measured. With the use of this program, information can be received for example about the number of the visitors as well as the amount of time they spend using the webpage. The program recognizes the IP address of the visitor, that is how it is able to follow the visitor. Similarly, the program may recognize whether it is the first time a visitor visits the website or the visitor is recurrent on the webpage. As a result, the program can trace the path of the visitor while visiting the webpage.

Google AdWords is an advertising service for businesses wanting to display ads on Google and its advertising network. Remarketing is an AdWords feature that allows marketers to show advertisements to users that have previously visited their website. Advertising campaigns typically measure the effectiveness of ads using Google AdWords program. In this case, apart from collecting Google Analytics data, the data of Google AdWords are also collected.

As informed by Google, these cookies store information which by themselves are not capable for identification. You must be informed that the setting and the use of Google Analytics and Google Remarketing programs are in full compliance with the requirements of Data Protection Authority. You may consult [Google Privacy Policy](#) for further information.

However, the user may deactivate the data processing and storing of cookies at any time. You may deny cookies as described below.

#### *How to prevent the setting of cookies?*

Of course, you may use websites without any cookies being set. In your browser, you can at any time configure or completely deactivate the use of cookies depending on the various setting possibilities ([Internet Explorer](#) , [Google Chrome](#), [Mozilla Firefox](#), [Safari](#)). These are the links which help you set those tracking functions that you permit and those which you allow.

In case you do not wish that Google Analytics would prepare a report about your visit, you may install Google's extension program that disables cookies. This extension commands Google Analytics Javascripts (ga.js, analytics.js and dc.js) not to send visitor information to Google. If you wish to disable the activity of Analytics, visit [Google Analytics Opt Out browser](#) and install the extension to your browser. For further information on installing this extension, turn to „Help” menu of your browser.

Please be advised that our Company does not currently use cookies or use Google Analytics or Google AdWords programs.

## **6. Newsletter and direct marketing related data processing**

By giving your consent during contracting, you agree to your personal data being used for marketing purposes. In this case – until the withdrawal of your consent – we process your data for newsletter sending and/or direct marketing purposes. We have the opportunity to send you newsletters and/or

offers and advertisements (Act XLVIII of 2008 on the conditions and limitations of economic advertisement activities).

You may at any time revoke your consent.

Please be advised that our Company does not currently use newsletter sending and/or direct marketing services.

## **7. Data transfer**

Our data may be forwarded only in compliance with the regulations. Our data processors must sign the terms and conditions in the form of a contract whereby they ensure that they do not use your personal data for purposes other than the ones you have priorly given your consent. Further information on this may be found in part 9 of this statement.

Our Company may forward data abroad only in compliance with the GDPR regulations.

The court, the prosecutor's department and other authorities (e.g. Police, Tax office, The National Authority for Data Protection and Freedom of Information) may solicit data or documents from our Company. In this case, we must act in conformity with our data providing obligation but only to the extent required by the given purpose.

## **8. Data Protection**

The Company's employees whose tasks concern data processing are entitled to handle the data you provide, but only to a priorly determined extent – in compliance with privacy obligations.

We protect your personal data with appropriate technical and other necessary measures as well as we ensure the safety of your data, we protect the data against unauthorized access, any modification, damage or any unauthorized use.

We have various trainings for the employees handling these data in order to ensure a safe use of data. We monitor the physical access to the data within our office, we make sure that the paper-based documents are safely stored. We use privacy policy, password protection and virus scanner software. However, you must be informed that data transfer through internet cannot be regarded as entirely safe. Our Company does everything it can in order for the processes to be as safe as possible, yet, we do not take responsibility for data transfer through the web. Nevertheless, we adhere to strict regulations regarding the data received by our Company to ensure the safe use of your data and hinder any unauthorized access to the data provided.

## 9. Service providers

The controller

Name: Data-Vita Ltd.

Headquarter and address: Hungary 6725 Szeged, Nyíl utca 58/b.

Contact: [info@data-vita.com](mailto:info@data-vita.com)

Telephone number: +36 30 488-5728

Tax number: 25488287-1-06

Corporate registration number: 06-09-022542

Registry Court: Registry Court of Szeged

In order to provide quality service to our customers, our Company uses the service of the following processors:

Name	Address	Responsibility
Rackhost Plc.	6722 Szeged, Tisza Lajos körút 41.	hosting service provider
Magyar Posta Plc.	1138 Budapest, Dunavirág utca 2-6.	delivery services
REDOR Ltd.	2163 Vácrátót, Rákóczi út 48.	accountancy

In case we perform any changes related to our processors, we include these modifications in this statement as well.

## 10. Your rights and your possibilities for legal redress

The following rights are available to you according to applicable data privacy laws:

- Right of information about your personal data stored by us;
- Right to request the correction, deletion or restricted processing of your personal data;
- Right to object to data processing;
- You may at any time with future effect revoke your consent to the collection, processing and use of your personal data;
- If you wish to lodge a complaint, you may make a legal redress (<https://naih.hu/general-information.html>).

Authority: National Authority for Data Protection and Freedom of Information

- Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
- Address: 1530 Budapest, Pf.: 5.
- Telephone number: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- Email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- Webpage: <https://naih.hu/>

For your convenience, we provide you with information on:

- the data processed by us;

- the source of data processed by us;
- the purpose and the legal basis of data processing;
- the duration of the data processing or, if this is not possible, we inform about the guidelines which define the duration;
- the names, addresses of those who process the given data as well as we provide information regarding activities related to data processing;
- our measures done in case of data protection incidents, their circumstances, their effects and measures done in order to prevent such incidents;
- in case of transferring your personal data, we provide information about its legal basis as well as information about those who we transfer data to.

We provide further information upon request preferably within 1 week (but in no longer than 1 month time). We provide further information free of charge except in case you have already had such a request in the given year. If you have already paid a fee for requesting information, we are ready to return it if we have processed your data in an inappropriate way, in an illicit way or if we had to make corrections with regard to how we processed your data. We may decline to give further information regarding data processing only if this complies with the regulations or if we provide information on legal redress or we inform you about the possibility of exercising your rights by turning to the Authorities.

Our Company informs you about any amendment, locks, delete or marking made. In addition, the Company informs about data transferring except in cases when by not informing you does not violate any regulations.

In case the Company fails to fulfill your request concerning amendment, lock or deleting, we will inform you – with your consent – via email or by post within 1 week (but in no longer than 1 month time) – about the reasons for refusing your request and we further give information about the possibilities to redress and how to turn to the authorities.

If you object against data processing, we will examine this within 1 week (but in no longer than 1 month time) after receiving your request and we will give further information regarding the decision in a written form. If we establish that your objection is grounded, we terminate the data processing and we inform those as well whom the data were transferred to, in order to be able for them to take steps as well.

If we prove that the data processing is done in compliance with the regulations and data processing is legally grounded, which are in priority to your interests, rights and freedom, we will object to fulfill your request concerning data processing. In case you disagree with the Company's decision, or if we fail to keep the deadline you may turn to court within 30 days after the decision or within 30 days after the last day of the deadline.

The legal proceedings are under the responsibility of the court. A foreign citizen may lodge a complaint at a temporary residence as well.

**Before turning to authorities or to court, we ask you to first contact our Company for a quick resolution and settling of the problem.**

## **11. Regulations to follow in case of our activities**

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- Act CXII of 2011 on autonomous information right and on the freedom of information
- Act V of 2013 on Civil Code
- Act CVIII of 2001 on questions regarding on questions regarding e-commerce services and services related to information society
- Act C of 2003 on e-communication
- Act CLV of 1997 on consumer protection
- Act CLXV of 2013 on complaints and public notices
- Act XLVIII of 2008 on the conditions and limitations of economic advertisement activities
- Act C of 2000 on accountancy

## **12. Review of privacy statement**

The present *Privacy Statement* shall be reviewed as necessary. Our Company reserves the right to modify the *Statement*. In case of modifications, we provide further information about these changes in a manner deemed appropriate by our Company.