Privacy Policy

Data Protection Information of

T.E.L.L. SOFTWARE HUNGARIA Kft. and

T.E.L.L. Biztonságtechnikai Rendszerek Kft.

The following information is provided to the visitors of our website and the customers of the webshop with regard to our personal data processing practices, the technical and organizational measures we take to ensure the protection of their data, their related rights, and their possibilities of exercising those rights.

Data controller:

- **T.E.L.L. Biztonságtechnikai Rendszerek Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság** (registered seat: 4034 Debrecen, Vágóhíd utca 2.; company registration number: 09-09- 027345; court of registration: Debreceni Törvényszék (Debrecen Regional Court); tax number: 25406812- 2-09; phone:+36- 52/530-130, fax: +36-52/530-131, e-mail: info@tell.hu, hereinafter collectively as: Company) and
- **T.E.L.L. SOFTWARE HUNGARIA Szoftver-fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság** (registered seat: 4034 Debrecen, Vágóhíd utca 2.; company registration number: 09-09-005193; court of registration: Debreceni Törvényszék (Debrecen Regional Court); tax number: 17783790-5-09; phone: +36- 52/530-130, fax: +36-52/530-131, e-mail: info@tell.hu, website: www.tell.hu,) and

as joint controllers (hereinafter collectively as: Company)

Data processors:

The data controller shall inform the data subjects that it uses the following data processors to carry out its activities:

- Data processing activities in relation to marketing activities:

T.E.L.L. Műszaki Fejlesztő Korlátolt Felelősségű Társaság (registered seat: 4034 Debrecen, Vágóhíd street 2.; company registration number: 09-09-027969; court of registration: Debreceni Törvényszék (Debrecen Regional Court); tax number: 25590395-2-09; phone:+36-52/530-130, fax: +36-52/530-131, e-mail: info@tell.hu,

- Data processing activities in relation to transport activities:

GLS General Logistics Systems Hungary Csomag-Logisztikai Kft. (2351 Alsónémedi, GLS Európa str. 2., info@gls-hungary.com, (+36 29) 88 66 70) Data processing activities related to transport activities

TNT Express Hungary Kft. (1185 Budapest, II. Logisztikai központ - Irodaépület, BUD Nemzetközi Repülőtér 283. ép., 06 8031 3131, https://www.tnt.com/express/hu_hu/site/support/contact.html)

The courier service participates in the delivery of the ordered goods on the basis of the contract concluded with the data Controller. The courier service handles the personal data received in accordance with the data management information available on its website.

- **Live chat on the website:** twak.to inc., 187 East Warm Springs Rd, SB298 Las Vegas, NV, 89119
- Data processing activity in relation to the operation of **CRM**:

MiniCRM Zrt. (company registration number: 01-10-047449, EU tax number: HU 23982273, help@minicrm.hu, +36 (1) 999 0401)

The processor shall be involved in the registration of orders on the basis of a contract with the controller. In doing so, the data processor shall address the name, address, telephone number, number and date of orders within the civil-legal limitation period.

- **Customer service system** (https://www.liveagent.com/" https://www.liveagent.com/, **+421 2 33 456 826**, info@liveagent.com, Quality Unit, s.r.o., Vajnorská 100/A, 831 04 Bratislava, SLOVAKIA

Hosting service provider: Unas Online Kft. (mailing address: 9400 Sopron, Kőszegi street 14., email: unas@unas.hu" unas@unas.hu)

The data processor shall perform the storage of personal data on the basis of a contract with the controller. It is not entitled to know personal data.

- **Data processing activity in relation to sending newsletters:**

Mailchimp system operator **The Rocket Science Group**, LLC (675 Ponce de Leon Avenue, Suite 5000, Atlanta, GA 30308 USA).

The data processor is involved in the sending of newsletters on the basis of a contract with the controller. In doing so, the data processor shall address the name and e-mail address of the data subject to the extent necessary for the newsletter.

The transmission of data to the data processor specified in this document may be carried out without the specific consent of the data subject. The data controller shall not transfer personal data it manages to third parties other than those specified in this document.

The data processor shall not act independently and shall be excluded from the contract with the controller and shall be entitled to act in accordance with the instructions received. The data processor shall record, manage and process personal data transferred and processed or processed by the data controller in accordance with the provisions laid down by GDPR and shall make a statement to the data controller.

The work of the data processor is overseed by the data controller.

The data processor is entitled to use additional data processors only with the consent of the data controller.

- **Processing the data of the visitors on the website of the Company**

Website information on the use of cookies

Following a common Internet practice, our Company uses cookies on its website

as well. Cookies are small files containing a line of characters which are saved on the visitor’s computer when they visit a website. Should they visit the site again, the cookies enable the website to be able to recognize the visitor’s browser. Cookies can store user settings (e.g. selected language) and other information, as well. Among other things, they can collect information about the visitor and his or her device, they remember the individual settings of the visitor, they may be used for example during online purchases. Cookies in general ensure that website can be used more easily, they enable users to have a true web experience, and that the website can become an efficient source of information, furthermore, they enable the operator of the website to monitor the operation of the website, to prevent abuse and to continue providing uninterrupted services at a satisfactory level.

The following data is collected and processed during the use of the webpage by our Company website with regard to the visitor and the device they use for browsing:

- the identifier of the product last viewed

From these data the system automatically generates statistical data. The operator does not link these with personal data.

It is not compulsory to accept and allow the use of cookies. You may reset your browser in a way that it bans all of the cookies or that is warns if the system is sending a cookie. Although most browsers automatically accept cookies by default, these may be changed to prevent automatic acceptance and so that it would offer a choice every time.

You can find more information on the cookie settings of the most popular browsers in the links below

- Google Chrome: https://support.google.com/accounts/answer/61416?hl=hu
- Firefox: https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak- haszn
- Microsoft Internet Explorer 11: http://windows.microsoft.com/hu-hu/internet-explorer/delete- manage- cookies#ie=ie-11
- Microsoft Internet Explorer 10: http://windows.microsoft.com/hu-hu/internet-explorer/delete- manage- cookies#ie=ie-10-win-7
- Microsoft Internet Explorer 9: http://windows.microsoft.com/hu-hu/internet-explorer/delete- manage- cookies#ie=ie-9
- Microsoft Internet Explorer 8: http://windows.microsoft.com/hu-hu/internet-explorer/delete- manage- cookies#ie=ie-8
- Microsoft Edge: http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq
- Safari: https://support.apple.com/hu-hu/HT201265

However, please be advised that some of the functions of the website or some of the services offered may not function properly without cookies.

The cookies used on the website are not suitable to enable the identification of the user on their own.

The cookies used on the Company website:

1. Session cookies that are technically indispensable

These cookies are necessary to enable visitors to browse the website, use all the functions and the services accessible through the website in a fault free manner, therefore - among others - specially to remember the operations carried out at the last visit on the specific webpage. Data processing period of these cookies is 2 hours.

Processed data:

- Language displayed
- Internal identifier of the currency
- User's address
- Selected mode of delivery and payment
- VAT rate
- Coupon details
- Current country
- Contents of the shopping cart
- Whether the user can make a purchase
- Internal identifier of the user
- Requests for quotation
- User's name

The legal basis of this data processing is Section 13/A. (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Elkertv.).

Purpose of data processing: to ensure the appropriate operation of the website

1. Cookies requiring consent:

These enable the Company to remember the choices the user made in connection with the website. Prior to using the service and during the use of the service users can ban this data processing at any time. These data cannot be linked to the personal data of the user and may not be transferred to third parties without the permission of the user.

Duration of processing: 1 day

- Cookies necessary to facilitate functioning:

The legal basis of the processing is the consent of the visitor.

Purpose of data processing: To increase the efficiency of the service, to improve user experience, to make the use of the website more convenient.

Duration of processing: 2 hours

- Performance cookies:

Google Analytics cookies – find more information here: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage

Google AdWords cookies - find more information here: https://support.google.com/adwords/answer/2407785?hl=hu

The Company informs its visitors that in order to measure the number of visitors at the www.tell.hu website and its sub-pages and to monitor the behavior of its visitors, compile statistics and ensure the effectiveness of its advertisements, it uses the following programs:

- Google Analytics

- Google AdWords Conversion Tracking

- Hotjar

- Poptin

- Facebook Remarketing

The programs referred to place so-called cookies on the user's computer that collect user data. Visitors of the website allow the Company to use Google Analytics, AdWords Conversation Tracking, and Facebook Remarketing, Hotjar programs. They also consent to the Company monitoring and tracking their user behavior and using all services provided by the programs. In addition, the visitor has the opportunity to disable the recording and storage of cookies for future reference at any time, as described below. We inform our visitors that Google Analytics, AdWords Conversion Tracking, and Facebook Remarketing, Hotjar and Poptin program settings and usage are fully compliant with the requirements of the data protection authority.

Google reports that Google Analytics uses a number of first-party cookies to report visitor interactions on its website. These cookies only store non-personally identifiable information. Browsers do not share their own cookies between domains. You can find more information on cookies in the Google Advertising and Privacy FAQ.

Google Analytics: The data controller uses Google Analytics primarily to generate statistics for, among other things, the performance of its campaigns. By using the program, the Company mainly obtains information about how many visitors visited the website and how much time the visitors spent on the website. The program recognizes the visitor's IP address thus it is able to track whether the visitor is a recurring or new visitor, and how the visitor traveled to the website and where they entered.

Google AdWords Conversion Tracking: Google AdWords Conversion Tracking is designed to help companies measure the effectiveness of its AdWords ads. It is done by using cookies placed on the visitor's computer, that last for 30 days and do not collect personal information.

Disable cookies: If you want to manage the cookie settings or disable this feature, you can do so in your own browser. This option can be found in the cookies/tracking functions menu, depending on your browser toolbar. You can usually set the tracking features you want to allow/disable on your computer in Tools > Settings > Privacy settings. If you do not want Google Analytics to report on your visits, you can install the Google Analytics disable browser plugin. This plug-in instructs Google Analytics JavaScript not to send information to Google on the visitors. In case the blocking plug-in is installed, visitors will not be participating in content experiments. To disable Google Analytics web activity, visit the Google Analytics disable page and install the plugin for your browser. For more information about installing and uninstalling the plugin, see the help function in your browser.

In addition to Google's services, the Company also uses Hotjar's analytics service: Hotjar Ltd. ("Hotjar") (http://www.hotjar.com, 3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta, Europe). Through Hotjar’s analysis, the Company has the opportunity to learn about and evaluate the habits of visitors on the website (e.g., how much time they spend on certain sub-pages, what links they click on, etc.). During the operation, information collected about the visit on the website will be transmitted to Hotjar's servers in Ireland, where it will be stored by Hotjar.

The following information can be recorded in connection with the visitor's device and browser:

- IP address of the user's device (collected and stored in anonymous format)

- The screen size of the user's device

- The type of the user's device and the browser they are using

- User location (country only)

With the help of Hotjar, the visit and the use of the website is analyzed, which is reported separately. During this feature, Hotjar also uses third-party services such as Google Analytics and Optimizely. The third parties mentioned through the data transfer may store the information that the user's browser sends while visiting the website (e.g., cookies, IP requests, etc.). Cookies used by Hotjar are not deleted for a different period of time, some cookies are automatically deleted after the current visit, but there are some that may last up to 365 days.

To disable data logging by Hotjar, please visit https://www.hotjar.com/opt-out.

You can find Hotjar's privacy policy here (https://www.hotjar.com/legal/policies/privacy).

On the website, the Company uses the so-called "Facebook pixel" of the Facebook social network operated by Facebook Inc. (1 Hacker Way, Menlo Park, CA 94025, USA) or, if you live in the EU, Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland) (the “Facebook”). The Facebook pixel allows Facebook to target website visitors to display ads (called Facebook ads). Accordingly, the Company uses the Facebook pixel to ensure that the embedded Facebook ads are displayed only to Facebook users who have also shown interest in the Company's offerings. The purpose of the Facebook pixel is to make Facebook ads relevant to the potential interest of users and not to be distractions. The Facebook pixel also allows the Company to analyze the effectiveness of advertisements on Facebook for statistical and market research purposes, such as whether the users have reached our website by clicking on a Facebook advertisement. Facebook embeds the Facebook pixel directly when you open our website, which can place a so-called cookie on the visitor’s device. If you sign in to Facebook later or visit Facebook when you are signed in, your visits will be registered in your profile. The data obtained about visitors is anonymous to us, which means that we are unable to identify you based on that. However, the data is stored and processed by Facebook so that it can be linked to the user profile. Facebook manages data in accordance with its own privacy policy. For more information on how the remarketing pixel works and how Facebook ads are displayed in general, see Facebook's privacy policy at https://www.facebook.com/policy.php. You can disable Facebook pixel data recording and the use of your data for displaying Facebook ads. To do so, visit Facebook and follow the instructions for personal ads settings: https://www.facebook.com/settings?tab=ads, the U.S. page address: http://www.aboutads.info/ choices / and the EU website at http://www.youronlinechoices.com/. The settings are platform-independent, meaning they apply to both desktops and mobile devices.

Data processed for the purpose of concluding and fulfil contracts

Data management cases may be implemented for the purpose of concluding a contract and fulfilling it. We inform you that data processing related to complaints and warranty administration will only be exchanged if one of those rights is exercised by the data subject.

If the data subject does not purchase through the webshop, only visits it, the section of data management for marketing purposes may apply to them, in case they give consent to the company.

Data processing for the conclusion and fulfilment of contracts in more detail:

- **Contact**

Contact is made when a person contact us by e-mail, contact form or phone with a question about a product. Pre-contact is not mandatory, it is possible to order from the webshop anytime.

Data processed:

Data provided during contact.

Duration of data processing:

The data will only be processed by the company until the contact is completed.

Legal basis for data processing:

The voluntary consent of the data subject, which is provided to the data controller by contact. [Data processing pursuant to article 6 (1) (a) of the regulation]

Recipients of personal data and categories of recipients: employees of the company performing customer service tasks, the company's hosting provider and its employees perfomring hosting tasks as data processors.

- **Registration for the use of the webshop/webstore**

The person who registers on the website can provide his or her consent for the processing of his or her personal data by ticking the appropriate box.

Data provided during registration:

- name
- business name
- e-mail address
- point-of-contact's phone number
- category (end user, installer, reseller, remote assistance, distributor)
- billing and shipping address

The purpose of personal data processing:

1. Fulfilling the services provided on the website, improving services
2. Keeping contact by electronic, phone, SMS and postal
3. Analysing the usage of the
4. Sale of advertising space
5. Use for conducting own research and preparing

Results generated from these are only published in a form which does not allow the identification of individual users.

Legal basis of the processing is the consent of the data subject.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service and its marketing activities, as data processors: IT provider of the Company and its employees dealing with hosting services.

Storage period of personal data: as long as registration is valid / the service is provided, or until data subject withdraws their consent (requests erasure, which can be sent to info@tell.hu e-mail address).

- **Processing of order**

During the processing of orders, data processing activities are necessary in order to fulfill the contract.

Data processed: name, address / location, phone number, e-mail address, characteristics of the purchased product, order number and date of purchase.

If you have placed an order in the webshop, providing data and data processing are essential for the fulfillment of the contract.

Duration of data processing: The data will be processed for 5 years according to the civil law limitation period.

Legal basis for data processing:

Performance of the contract. [Data processing pursuant to article 6 (1) (b) of the regulation]

Recipients of personal data and categories of recipients: employees of the company performing tasks related to the processing of orders, the company's hosting provider and its employees performing hosting tasks as data processors.

- **Issuance of invoice:**

Data processing is carried out in order to issue an invoice in accordance with the law and to fulfill the obligation to keep accounting records. Pursuant to paragraph 169 (1) to (2) of the Accounting Law, companies must keep the accounting document directly and indirectly supporting the accounting records.

Data processed:

Name, address, e-mail address, phone number.

Duration of data processing:

Pursuant to paragraph 169 (2) of the Accounting Law, the issued invoices shall be kept for 8 years from the date of issue of the invoice.

Legal basis for data processing:

Pursuant to paragraph 159 (1) Law CXXVII of 2007 on value added tax, the issuance of the invoice is obligatory and it must be kept for eight years pursuant to paragraph 169 (2) of the Accounting Law C of 2000. [Data processing pursuant to article 6 (1) (a) of the regulation]

Recipients of personal data and categories of recipients: employees of the company performing tasks related to billing.

- **Data processing in relation to the transport of goods**

Data processing is carried out in order to deliver the ordered product.

Data processed: Name, address, e-mail address, phone number.

Duration of data processing:

The controller shall treat the data for the duration of the delivery of the ordered goods.

Legal basis for data processing: performance of the contract [Data processing pursuant to article 6 (1) (b) of the regulation].

Data processing recipients related to the transport of goods, data processors:

Name of the recipient: employees of the company performing tasks related to performing orders, GLS General Logistics Systems Hungary Csomag-Logisztikai Kft., TNT Express Hungary Kft.

The courier service shall contribute to the delivery of the ordered goods on the basis of a contract with the controller. The personal data received by the courier service shall be processed in accordance with the data management information available on its website.

- **Data processed in relation to the verifiability of the consent**

During the registration, ordering and subscribing to the newsletter, the IT system stores the IT data related to the consent for later verification.

Data processed: Date of consent and IP address of the data subject.

Duration of data processing:

Due to legal requirements, the consent must be able to be verified later, thus the period of data storage is in line with the limitation period of the data processing.

Legal basis for data processing:

This obligation is laid down in Article 7 (1) of the Regulation [Data processing pursuant to Article 6 (1) (c) of the Regulation]

Recipients of personal data and categories of recipients: employees of the company providing technical support, the hosting provider of the company and its employees providing hosting services as data processors.

- **Data processing related to the newsletter service**

The Company operates a newsletter system for the purpose of continuously informing those interested. In connection with that, we process the personal data (full name, e-mail address) provided during the registration on the website with the prior written consent of the recipient of the newsletter. The Company's newsletters are sent from abroad via the "Mailchimp" international newsletter system. In addition to the registration, your express consent is required to transfer your personal data to a foreign data controller. The Mailchimp system is operated by The Rocket Science Group, LLC (675 Ponce de Leon Avenue, Suite 5000, Atlanta, GA 30308 USA). The data processing in accordance with the European Union regulations is ensured by the foreign operator in accordance with the provisions of the "EU-U.S. Privacy Shield Framework" data exchange agreement. The data subject may unsubscribe from the newsletter at any time by clicking on the "Unsubscribe" button in the footer of the newsletters, which will automatically delete the data stored in the system. You can also express your request in e-mail to unsubscribe (info@tell.hu) and the Company will delete your data immediately or not later than within 15 days.

The person who registers on the website for the newsletter service can provide his or her consent for the processing of his or her personal data by pressing the Subscribe button after ticking the appropriate box for providing consent for the processing of data. Data subject can unsubscribe at any time by using the “Unsubscribe” application of the newsletter, or by sending a written declaration via an e-mail, which means the withdrawal of the consent. In such cases every data concerning the unsubscribing person must be deleted without delay.

Scope of personal data that can be processed: name of natural person (first and last name), e-mail address.

The purpose of processing the personal data:

1. Sending newsletters about the products and services of the Company
2. Sending advertising material
3. Communication regarding technical information (updates, new functions, patches)

Legal basis of the processing: the consent of the data subject

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service and its marketing activities, employees of the IT provider of the Company as data processors with the purpose of providing the hosting service.

Storage period of personal data: as long as the newsletter service is provided, or until data subject withdraws his or her consent (until his or her request for erasure, which can be sent to info@tell.hu e-mail address).

- **Recording the telephone conversations of the customer service**

The Company records the telephone conversations made with its customer service with the purpose of conducting sales, providing services and with the purpose of providing information about them. Legal basis of the processing is the consent of the data subject.

Notification must be given that a recording will be made, and consent must be gained at the beginning of the call.

The following data are collected when phone conversations are recorded: phone number, date and time of the call, recording of the conversation, personal data provided during the conversation.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service.

Telephone conversations are stored for 1 year. The recorded material can be searched using the telephone number and the date of the call.

- **Community guidelines / Data processing on the Facebook page of the Company**

The Company maintains a Facebook page in order to raise awareness of and promote its products and services.

Questions submitted on the Facebook page of the Company do not constitute an official complaint.

The Company does not process the personal data that the visitors of the Facebook page of the Company reveal.

Data protection and General terms and conditions of Facebook apply to visitors.

In the event that unlawful or offensive content is posted, the Company may, without prior notification, ban data subject from the members, or delete their posts.

The Company does not accept any responsibility whatsoever for data content or posts published by Facebook users that are in breach of legislation. The Company does not accept any responsibility whatsoever for errors, malfunctions resulting from the operation of

Facebook, or for issues resulting from a change in the functioning of the system.

- **Data processing with the purpose of direct marketing**

Unless regulated otherwise by law, advertisements can only be sent to natural person recipients of an advertisement directly (direct marketing), especially by way of electronic correspondence or other, equivalent individual means of communication - with the exception set forth in Act XLVIII of 2008 - if the recipient of the advertisement has provided his or her prior, explicit and unequivocal consent.

Scope of personal data that the Company may use for direct marketing purposes: name, address, phone number, e-mail address, online identifier of the natural person.

The purpose of processing the personal data is to carry out direct marketing activities related to the operation of the Company, i.e. the sending of advertising publications, newsletters, current promotions in printed form (by post) or by an electronic means (e-mail) on a regular basis or at intervals to the contact details provided at registration.

Legal basis of the processing: the consent of the data subject

Recipients of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service activities, as data processors: the employees of the IT provider of the Company providing server services and in case of postal deliveries, the employees of the Post.

Storage period of personal data: until consent is withdrawn.

- **Processing the data of contracting partners**

Under the legal title of performing a contract, the Company processes the name, birth name, date of birth, mother's name, address, tax identification number, tax number, residential address, address of the registered seat and premises, phone number, e-mail address, website URL, bank account number, client number (customer number, order number), online identifier (list of buyers and suppliers, customer loyalty lists) of the natural persons that enter into a contract with the Company as clients or suppliers, with the purpose of concluding, performing, terminating the contract or on order to provide contractual discounts. This data processing is lawful even if it is necessary for the implementation of the measures that data subject requested prior to entering into contract. Recipient of personal data: employees of the Company performing tasks related to serving customers, its employees performing accounting and taxation-related tasks, and its data processors. The duration of personal data processing: 5 years after the agreement terminated.

Data subject must be notified that the legal basis of the processing is the performing of the contract, this notification may be made in the agreement, as well.

Data subject must be notified that his or her personal data are forwarded to the data processor.

- **Contact details of natural persons who represent legal entities as clients, buyers, suppliers**

Scope of the processed personal data: name, address, phone number, e-mail address of the natural person.

The purpose of processing the personal data: performing the contract the Company entered into with its partner who is a legal entity, maintaining business contact. Service Provider processes the personal data in accordance with Article 6 section (1) point f) of GDPR and the legal basis is its legitimate interest in establishing and maintaining business relations.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service.

Personal data are stored for five years after the business relation existed, or after the data subject acted as point of contact.

- **Data processing during technical support**

The scope of personal data that can be managed: name, address, phone number, e-mail address of the natural person, the troubleshooting log, which contains all the communication between the device and the software.

The purpose of the processing of personal data: fulfillment of the contract concluded with the Company's partner, performance of technical support tasks, troubleshooting. The title of data processing is based on the title of performance of the contract.

Recipient of personal data, and categories of recipients: employees of the Company performing technical support tasks.

Storage period of personal data: duration of the performance of technical support tasks and troubleshooting, after which the data will be deleted immediately.

- **Activity related to the popup information windows appearing on the website:**

The Data Controller uses the Poptin software for managing pop-up windows and data collection forms on its website. The purpose of data processing is market research and marketing activities. The data processing is always based on the consent of the visitors, provided they have accepted the use of cookies that require consent.

Processed data: name, email address, and other data provided by the visitor. In addition to the above, it collects and stores information related to the use of the website, such as visited pages, clicked links, non-sensitive text entries, and mouse movements, as well as more frequently collected information such as IP address, referring URL, browser, operating system, cookie information, Internet service provider, and any other information from the visitor related to the use of the website ("Visitor Information"). The entirety of Visitor Information can identify the visitor, however, the Poptin system does not identify the visitor during website browsing if cookies are disabled.

The operator of the Poptin system is Poptin LTD. Headquarters: Wework, Aluf Kalman Magen St 3, Tel Aviv-Yafo, Israel)

Website: https://www.poptin.com/

The service provider's privacy statement: https://www.poptin.com/gdpr/

The Data Processor processes and stores personal data on behalf of the Data Controller, based on the contract between them.

INFORMATION SUMMARY ON THE RIGHTS OF DATA SUBJECTS

In this chapter, to provide transparency and ensure unambiguity, we will summarize the rights of the data subject, and the next chapter will contain detailed information on how to exercise them.

Right to preliminary notification

Data subject has the right to receive information on the facts and information related to the processing prior to the beginning of the processing.

(Regulation Art. 13-14)

Data processing can only begin after the information has been provided. If the legal basis of the processing is consent, the data subject must provide his or her consent in addition to the information provided. Detailed rules are included in the next chapter.

Data subject's right to access

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information determined in the Regulation.

(Regulation Art. 15)

Detailed rules are included in the next chapter.

Right to rectification

Data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Having regard to the purpose of the processing, data subject has the right to request the incomplete personal data to be completed, among others, by way of a supplementary declaration.

(Regulation Art. 16)

Right to erasure ("the right to be forgotten")

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, and controller shall be obliged to erase the personal data concerning the data subject without undue delay, where one of the grounds set forth in the Regulation applies. (Regulation Art. 17)

Detailed rules are included in the next chapter.

Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where the grounds set forth in the Regulation apply.

(Regulation Art. 18)

Detailed rules are included in the next chapter.

Obligation to notify in case of the rectification, erasure of the personal data or the restriction of processing

Controller shall notify every recipient to whom the personal data have been revealed of every rectification, erasure or restriction of processing, except where this proves impossible or would require disproportionate efforts. Controller shall inform the data subject about those recipients should the data subject request it. (Regulation Art. 19)

Right to data portability

Subject to the conditions set forth in the Regulation, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format; and furthermore, he or she has the right to have those data transferred to another Controller without this process being hindered by the Controller to whom he or she has provided such personal data.

(Regulation Art. 20)

Detailed rules are included in the next chapter.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of his or her personal data which is based on point (e) of Article 6(1) of the Regulation (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or on point f) Art 6(1) (processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party).

(Regulation Art. 21)

Detailed rules are included in the next chapter.

Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

(Regulation Art. 22)

Detailed rules are included in the next chapter.

Restrictions

Union or Member State law to which the Controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12 to 22, in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22.

(Regulation Art. 23)

Detailed rules are included in the next chapter.

Communication of a personal data breach to the data subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, Controller shall communicate the personal data breach to the data subject without undue delay. (Regulation Art. 34)

Detailed rules are included in the next chapter.

Right to lodge a complaint with a supervisory authority

Data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal

data relating to him or her infringes this Regulation. (Regulation Art. 77)

Detailed rules are included in the next chapter.

Right to an effective judicial remedy against a supervisory authority

Every natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them, or when the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint.

(Regulation Art. 78)

Detailed rules are included in the next chapter.

Right to an effective judicial remedy against a controller or a data processor

Every data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.

(Regulation Art. 79)

Detailed rules are included in the next chapter.

DETAILED INFORMATION ON THE RIGHTS OF THE DATA SUBJECT

Right to preliminary notification

Data subject has the right to receive information on the facts and information related to the processing prior to the processing begins.

Information to be provided where personal data are collected from the data subject

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:
2. the identity and the contact details of the controller and, where applicable, of the controller's representative;
3. the contact details of the data protection officer, where applicable;
4. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
5. where the processing is based on point (f) of Article 6(1) (pursuing legitimate interests), the legitimate interests pursued by the controller or by a third party;
6. the recipients or categories of recipients of the personal data, if any;
7. where applicable, the fact that the controller intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
8. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:
9. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
10. the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
11. where the processing is based on point (a) of Article 6(1) of the Regulation (data subject’s consent) or point (a) of Article 9(2) of the Regulation (data subject’s consent), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
12. the right to lodge a complaint with a supervisory authority;
13. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
14. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
15. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph
16. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the (Regulation Art. 13)

1. **Information to be provided where personal data have not been obtained from the data subject**

1. Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information:
2. the identity and the contact details of the controller and, where applicable, of the controller's representative;
3. the contact details of the data protection officer, where applicable;
4. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
5. the categories of personal data concerned;
6. the recipients or categories of recipients of the personal data, if any;
7. where applicable, that the controller intends to transfer personal data to a recipient in a third country or international organization and the existence or absence of an adequacy decision by the

Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.

1. In addition to the information referred to in paragraph 1, the controller shall provide the data subject with the following information necessary to ensure fair and transparent processing in respect of the data subject:
2. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
3. where the processing is based on point (f) of Article 6(1) (legitimate interest), the legitimate interests pursued by the controller or by a third party;
4. the existence of the right to request from the controller access to and rectification or erasure of the personal data concerning him or her, as well as to restrict or to object to the processing of the personal data concerning the data subject, as well as the right to data portability;
5. where the processing is based on point (a) of Article 6(1) of the Regulation (data subject’s consent) or point (a) of Article 9(2) of the Regulation (data subject’s consent), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
6. the right to lodge a complaint with a supervisory authority;

7. from which source the personal data originate, and if applicable, whether it came from publicly accessible sources; and
8. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
9. The controller shall provide the information referred to in paragraphs 1 and 2:
10. within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
11. if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
12. if a disclosure to another recipient is envisaged, at the latest when the personal data are first
13. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph
14. Paragraphs 1 to 4 shall not apply where and insofar as:
15. the data subject already has the information;
16. the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) of the Regulation or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;
17. obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests; or
18. the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of

(Regulation Art. 14)

Data subject's right to access

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
2. the purposes of data processing:
3. the categories of personal data concerned;
4. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
5. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
6. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
7. the right to lodge a complaint with a supervisory authority;
8. where the personal data are not collected from the data subject, any available information as to their source;
9. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
10. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of the Regulation relating to the transfer.
11. The controller shall provide the data subject with a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic The right to obtain a copy shall not adversely affect the rights and freedoms of others. (Regulation Art. 15)

Right to erasure ("the right to be forgotten")

1. The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay, and Controller shall be obliged to erase the personal data concerning the data subject without undue delay, where one of the following grounds applies:
2. personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
3. the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of the Regulation, and where there is no other legal ground for the processing;
4. the data subject objects to the processing pursuant to Article 21(1) of the Regulation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
5. the personal data have been unlawfully processed;
6. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
7. the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the
8. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal
9. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
10. for exercising the right of freedom of expression and information;
11. for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
12. for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of the Regulation;
13. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
14. for the establishment, exercise or defence of legal claims. (Regulation Art. 17.)

Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
2. the accuracy of the personal data is contested by the data subject, in this case the restriction is for a period enabling the controller to verify the accuracy of the personal data;
3. the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

4. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
5. the data subject has objected to processing pursuant to Article 21(1); in this case the restriction is for the period until it is verified whether or not the legitimate grounds of the controller override those of the data
6. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member
7. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is

(Regulation Art. 18)

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she

has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

1. the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
2. the processing is carried out by automated means.
3. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically
4. The exercise of this right shall be without prejudice to Article 17 of the Regulation. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the
5. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of (Regulation Art. 20)

Right to object

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) of Article 6(1) of the Regulation (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or point f) (processing is necessary for pursuing the legitimate interests of controller or a third party), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct
3. Where the data subject objects to processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the Regulation, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

(Regulation Art. 21)

Automated individual decision-making, including profiling

1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or
2. Paragraph 1 shall not apply if the decision:
3. is necessary for entering into, or performance of, a contract between the data subject and a data controller;
4. is authorized by Union or Member State law to which the controller is subject, and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
5. is based on the data subject's explicit
6. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, including at least data subject’s right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
7. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1) of the Regulation, unless point (a) or (g) of Article 9(2) applies

and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place. (Regulation Art. 22)

Restrictions

1. Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12 to 22 and Article 34, as well as Article 5 in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22, when such a restriction respects the essence of the fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to safeguard:
2. national security;
3. defence;
4. public security;
5. the prevention, investigation, detection or prosecution of criminal offenses or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
6. other important objectives of general public interest of the Union or of a Member State, in particular an important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security;
7. the protection of judicial independence and judicial proceedings;
8. the prevention, investigation, detection and prosecution of breaches of ethics for regulated professions;
9. a monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in the cases referred to in points (a) to (e) and (g);
10. the protection of the data subject or the rights and freedoms of others;
11. the enforcement of civil law

1. In particular, any legislative measure referred to in paragraph 1 shall contain specific provisions at least, where relevant, as to:
2. the purposes of the processing or categories of processing;
3. the categories of personal data;
4. the scope of the restrictions introduced;
5. the safeguards to prevent abuse or unlawful access or transfer;
6. the specification of the controller or categories of controllers;
7. the storage periods and the applicable safeguards taking into account the nature, scope and purposes of the processing or categories of processing;
8. the risks to the rights and freedoms of data subjects; and
9. the right of data subjects to be informed about the restriction, unless that may be prejudicial to the purpose of the

(Regulation Art. 23)

Communication of a personal data breach to the data subject

1. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, Controller shall communicate the personal data breach to the data subject without undue
2. The communication to the data subject referred to in paragraph 1 of this Article shall describe in clear and plain language the nature of the personal data breach and contain at least the information and measures referred to in points (b), (c) and (d) of Article 33(3) of the
3. The communication to the data subject referred to in paragraph 1 shall not be required if any of the following conditions are met:
4. the controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access the personal data, such as encryption;
5. the controller has taken subsequent measures after the personal data breach which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialize;
6. communication would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.
7. If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred to in paragraph 3 are met. (Regulation Art. 34)

Right to lodge a complaint with a supervisory authority

1. Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this
2. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article

(Regulation Art. 77)

The supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information. The detailed statutory regulations to be applied are included in Act CXII of 2011 on Informational Self-determination and Freedom of Information.

Right to an effective judicial remedy against a supervisory authority

1. Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning
2. Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent pursuant to Articles 55 and 56 does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged pursuant to Article
3. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is
4. Where proceedings are brought against a decision of a supervisory authority which was preceded by an opinion or a decision of the Board in the consistency mechanism, the supervisory authority shall forward that opinion or decision to the court.

(Regulation Art. 78)

Right to an effective judicial remedy against a controller or a data processor

1. Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Article 77 of the Regulation, each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this
2. Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an Such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

(Regulation Art. 79)

LODGING A REQUEST BY DATA SUBJECT, CONTROLLER'S MEASURES

1. The controller shall provide to the data subject information on the measures taken in response to his/her request for the exercising of his or her rights without undue delay but under no circumstances later than one month after the receipt of such a request.
2. That period may be extended by two further months where necessary, taking into account the complexity and the number of the requests. The controller shall inform the data subject of any such extension no later than one month after the request has been received and shall provide the reasons for the
3. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information, where possible, shall be provided by electronic
4. If the controller does not take action on the request of the data subject, it shall inform the data subject of the reasons for not taking action without delay but not later than one month after the request has been received and shall inform the data subject of

the possibility of lodging a complaint with a supervisory authority or seeking a judicial

5. The data controller shall provide the information pursuant to Articles 13 and 14 of the Regulation and the information on the rights of the data subject (Articles 15 to 22 and 34 of the Regulation) without a fee. If the request

of the data subject is unquestionably unfounded or excessive, especially due to its repetitive nature, the controller may, with regard to the administrative costs of providing the requested information or communication or the implementation of the measures:

1. charge a fee of HUF 6,350, or
2. deny action in response to the

The burden of proof for determining the unquestionably unfounded or excessive nature of the request shall be borne by the controller.

1. Where the controller has reasonable doubts concerning the identity of the natural person exercising the rights of the data subject, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

DATA SECURITY

In the operation of our information technology systems, we implement the necessary solutions to manage privileges, and apply the necessary internal organizational and technical solutions to ensure that your data cannot be accessed, erased, saved from the system, or altered by unauthorized persons. We ensure that the data protection and data security requirements are observed by our data processors, as well. We keep records of any personal data breach, and where necessary, we inform the data subject of the incidents that have occurred and in so far as it is required by the Regulation.