

Privacy policy

General provisions

1. This Privacy Policy is issued by SquareLine Kft. (registered office: Hungary, 2022 Tahitótfalu, Viola utca 1.; registry number 13-09-226482; tax number: 32249723-2-13; contact: contact@squareline.io) as the Service Provider, the rules of data management arising from the use of the services available on the website <https://squareline.io> (hereinafter referred to as the Service) by the user (hereinafter referred to as the User) and the data management arising from the exercise of the Service Provider's activity.
2. Pursuant to 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 or GDPR), the Service Provider provides the following information on data processing.
3. The website concerned is https://squareline.io/docs/privacy_policy.pdf (hereinafter referred to as the Website) where this Privacy Policy is available in electronic format. By accessing and using the Website and the Service, the data subject agrees to accept this Privacy Policy.
4. The Service Provider reserves the right to unilaterally modify this Privacy Policy. The amendments shall enter into force on the day following their publication on the Website.
5. Data controller is the Service Provider.

Definitions

6. **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;
7. **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
8. **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;

9. **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
10. **Recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
11. **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;
12. **Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
13. **Website:** <https://squareline.io>
14. **User:** The person who accesses the content on the Website.
15. **Client:** a natural or legal person who buys a subscription for licensing.

Principles relating to processing of personal data

16. Personal data shall be:
 - (a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
 - (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of GDPR, not be considered to be incompatible with the initial purposes ('purpose limitation');
 - (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
 - (d) accurate and, where necessary, kept up to date; every reasonable step must be taken 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');
 - (e) 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of GDPR subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

- (f) 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').
- 17. The controller shall be responsible for, and be able to demonstrate compliance with the previous principles ('accountability').

Data processing by the Service Provider

- 18. Possible legal bases for data processing under the GDPR:
 - (a) pursuant to Article 6(1)(b) of the GDPR, processing is **necessary for the performance of a contract** to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract,
 - (b) the processing of personal data is necessary for tax purposes, accounting purposes, legal registration, prevention of money laundering, prevention of fraud and terrorist financing, or to comply with a **legal obligation** to which the controller is subject pursuant to Article 6(1)(c) of the GDPR,
 - (c) in the case of third parties (other than the Client), there is a **legitimate interest** in maintaining ongoing contact with the third party employed, engaged or providing services to the Client, to promote the clients relationship, pursuant to Article 6(1)(f) of the GDPR.
- 19. The possible legal bases for data processing are based on Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (hereinafter: E-Commerce Act.):
 - (a) Article 13/A (1): the service provider may process the natural person's identification data and address necessary for the identification of the User for the purposes of creating, defining the content of, amending, monitoring the performance of, invoicing the fees arising from, and enforcing claims in connection with the provision of information society services.
 - (b) Article 13/A (2): the service provider may process, for the purpose of invoicing the fees arising from the contract for the provision of an information society service, natural person identification data, address, and data relating to the time, duration and place of use of the information society service.
 - (c) Article 13/A (3): in addition to the provisions of paragraph (2), the service provider may process personal data which are technically necessary for the provision of the service. The service provider shall, other conditions being equal, choose and in any case operate the means used in the provision of the information society service in such a way that personal data are processed only to the extent strictly necessary for the provision of the service and for the fulfilment of the other purposes specified in this Act, but even in this case only to the extent and for the duration necessary.

The scope of the data processed and the purposes of the processing are set out in the table below:

Name of data processing	Personal data processed	Legal basis for data processing	Purpose of data processing	Duration of data processing
Personal data provided during contact and	Personal data provided to the Service Provider by a natural	Pursuant to Article 6(1)(b) of the GDPR, processing is necessary for the	Establishing contact, communication	5 years or until withdrawal of consent of the data subject

<p>communication, completion of data request forms on the Website - Registration</p>	<p>person who is not a contracting party or a contracting party's contact person and who has a relationship with the Service Provider. The User has the possibility to contact the Service Provider through the forms on the Website, where the provision of surname and first name, telephone number, email address is mandatory.</p>	<p>performance of a contract to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into a contract. For communication out of the scope of a contract: consent, pursuant to Article 6(1)(a) of the GDPR</p>		
<p>Personal data processed in connection with the conclusion and performance of the Contract – Order and payment</p>	<p>Personal data of the client, the client's representative, employees and other natural persons processed in connection with the performance of the specific contract (name, address, tax identification number, postal address, telephone, e-mail address and other personal data relating to the performance of the contract). Name of the data subject, type of representation/title/position, telephone, e-mail address and other data relating to the representation.</p>	<p>Article 6(1)(b) of the GDPR (taking steps at the request of the contracting party and, after the conclusion of the contract, performance of the contract), Article 6(1)(c) of the GDPR (performance of a legal obligation).</p>	<p>The conclusion and performance of the Contract, as well as the verification and enforcement of rights and obligations under the Contract and the maintenance of contact in connection with the performance of the Contract (including license management).</p>	<p>During the term of the contract or 5 (five) years after the termination of the contract. The Data Controller shall, pursuant to its obligation under Article 169 of Act C of 2000 on Accounting (hereinafter referred to as the "Accounting Act"), process the accounting documents (including general ledger accounts, analytical and detailed records) and the personal data contained therein for 8 (eight) years after the termination of the Contract, or, in the event of a dispute, for 5 (five) years after the conclusion of the dispute, if later, on the basis of the legal basis for the</p>

				<p>performance of its legal obligation. The Data Controller shall, in accordance with its obligation under Section 179 of Act CXXVII of 2007 on Value Added Tax (hereinafter referred to as the "VAT Act"), process the documents issued by it, or in its possession or otherwise at its disposal, and the personal data contained therein and relating thereto, in order to ensure that the tax assessment is complete and correct, at least until the right to assess the tax has expired. The Controller shall be subject to the provisions of Article 78 (3) of Act CL of 2017 (General Tax Code), in order to ensure that the tax assessment can be verified as complete and correct, the Controller shall process the documents issued by the Controller, or held by the Controller or otherwise at the Controller's disposal, and the personal data contained therein and relating thereto until the right to assess the tax has expired, or in the</p>
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				case of deferred tax, until 5 (five) years from the last day of the calendar year in which the tax becomes due, or in the case of a dispute, until 5 (five) years after the dispute has been resolved.
Newsletter and marketing purposes	Name, email address, telephone number of the data subject.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes on the basis of Article 6(1)(a) of GDPR.	The data subject may provide some personal data in order to be informed on the new products, Services or operation of the Service Provider for marketing purposes.	Until the withdrawal of the consent of the data subject.
Complaint handling	Name, address, email address, telephone number and the details of the contract and complaint of the User.	The Service Provider provides the possibility to cure the complaints of the User related to the Service according to Article 6(1)(b) of GDPR. In case the User is a consumer, the legal basis is Article 6(1)(c) of GDPR.	Communication about and settlement of the complaints of the User.	5 years or if the User is a consumer, 3 years in accordance with Article 17/A (7) Act CLV of 1997 on Consumer Protection.

20. If the Client does not provide the above information, it may prevent the fulfilment of the order and other purposes.
21. Persons concerned by the processing: in relation to the data provided through the Website, the User, in other cases the Client, or, on the basis of the Client's order, the third party concerned by the order (e.g. contractual partner, counterparty).
22. The possible recipient of the personal data may be an employee, worker, agent or proxy of the Service Provider in the context of the provision of the Service, in compliance with the data protection principles.
23. The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, object to the processing of such personal data and have the right to data portability and to withdraw consent at any time. The exercise of the right of withdrawal shall not affect the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.

24. The data subject may request access to, erasure, modification or restriction of processing of personal data, data portability or objection to processing by using the following contact details: support@squareline.io
25. Where the Client is a legal person, the Client warrants that it is authorized to provide the personal data it has provided, that it has informed the contact person of the contents of this Privacy Policy and that it keeps the personal data provided up to date and updated.

The hosting provider as data processor

26. Activity provided by the data processor: hosting services.
27. Name and contact details of the data processor:

Google Ireland Limited (registered number: 368047) with its registered office located at 1st and 2nd Floor, Gordon House, Barrow Street, Dublin 4, Ireland
28. The data processor processes all personal data provided by the User through the Website. The subject of the data processing is the User.
29. The purpose of the processor's processing is to ensure the continuous operation of the Website and the smooth functioning of its functions.
30. The processing of the data by the processor shall continue until the termination of the contract between the controller and the processor or until the data subject's request for erasure to the processor.
31. Legal basis for processing:
 - (a) pursuant to Article 6 (1)(b) of the GDPR, processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract,
 - (b) Article 13/A (3) of E-Commerce Act,
 - (c) pursuant to Article 46 of the GDPR data transfer outside the EU: no.

The payment service provider as data processor

32. Activity provided by the data processor: payment services.
33. Name and contact details of the data processor:

Stripe, Inc., 354 Oyster Point Boulevard, South San Francisco, California, 94080, USA (www.stripe.com)
34. The data processor processes the personal data provided by the User through the Website as follows: <https://stripe.com/en-hu/privacy>. The subject of the data processing is the User.

35. The purpose of the processor's processing is to ensure the payment services.
36. The processing of the data by the processor shall continue until the termination of the contract between the controller and the processor or until the data subject's request for erasure to the processor.
37. Legal basis for processing:
 - (a) pursuant to Article 6 (1)(b) of the GDPR, processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract,
 - (b) Article 13/A (3) of E-Commerce Act,
 - (c) pursuant to Article 46 of the GDPR data transfer outside the EU: to the USA
DPA: <https://stripe.com/en-hu/legal/dpa>

The billing service provider as data processor

38. Activity provided by the data processor: billing services.
39. Name and contact details of the data processor:
KBOSS.hu Kft., 1031 Budapest, Záhony utca 7., Hungary (www.szamlazz.hu)
40. The data processor processes the personal data provided by the User through the Website as follows: <https://www.szamlazz.hu/adatvedelem/>. The subject of the data processing is the User.
41. The purpose of the processor's processing is to ensure the billing services.
42. The processing of the data by the processor shall continue until the termination of the contract between the controller and the processor or until the data subject's request for erasure to the processor.
43. Legal basis for processing:
 - (a) pursuant to Article 6 (1)(b) of the GDPR, processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract,
 - (b) Article 13/A (3) of E-Commerce Act,
 - (c) pursuant to Article 46 of the GDPR data transfer outside the EU: no.

The newsletter service provider as data processor

44. Activity provided by the data processor: newsletter services.

45. Name and contact details of the data processor:
MailChimp c/o The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA
46. The data processor processes the personal data provided by the User through the Website as follows: <https://www.intuit.com/privacy/statement/>.
The subject of the data processing is the User.
47. The purpose of the processor's processing is to ensure the newsletter services.
48. The processing of the data by the processor shall continue until the termination of the contract between the controller and the processor or until the data subject's request withdrawal to the controller/processor.
49. Legal basis for processing:
 - (a) pursuant to Article 6 (1)(a) of the GDPR, the data subject has given consent to the processing of his or her personal data for one or more specific purposes,
 - (b) pursuant to Article 46 of the GDPR data transfer outside the EU: to the USA.
DPA: <https://mailchimp.com/legal/data-processing-addendum/>

Use of cookies (cookies)

50. Cookies are small packets of data, text files, that are placed on a visitor's browser or device when they visit a website or application. Cookies allow a website to recognise a visitor on their next visit, and thereby provide security, convenience features and improve the user experience while browsing the site.
51. The Website uses the following cookies:
 - (a) Essential cookies necessary for the operation of the website.
 - (b) Cookies necessary for statistical purposes.
 - (c) Targeting and advertising cookies.
52. The Website informs the User about the use of cookies in a pop-up message. Service Provider builds facilities into the Website that allow Users to accept, refuse and withdraw consent for different types of cookies.
53. The data processing concerns IP addresses, dates and times.
54. Data processing covers all Users of the Website.
55. The purpose of data management is to monitor the activity of Users in a statistical and marketing anonymous way.

56. By using cookies, no personal data is processed by the data controller.

Most browsers automatically accept cookies by default, but the User can usually change these settings and turn off automatic acceptance. Data subjects have the option to delete cookies in the privacy settings of their browsers. For more information on the cookie settings of the most popular browsers, User can visit the following URLs:

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Microsoft Internet Explorer 11: <https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Microsoft Edge: <https://support.microsoft.com/en-us/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd>
- Safari: <https://support.apple.com/en-gb/HT201265>

57. Deleting or disabling cookies may result in certain features of the Website not working properly.

58. According to the European Union Data Protection Working Party's Opinion 2012/4 on the cookie opt-out, consent is not required for the following types of cookies, but only information on their use is provided to Users:

- a cookie that stores information recorded by the user ("user-input cookies"),
- authentication session cookies,
- user centric security cookies,
- multimedia player session cookie,
- load balancing session cookies,
- user interface customization cookies.

59. Type of cookies:

Type of cookie	Legal basis for data processing	Purpose of data processing	Duration of data processing	Processed data
Session cookies	Legitimate interest under Article 6 (1) (f) GDPR. Data processing is in the legitimate business interest of the Service Provider, because it enables it to further develop its Website and make it	Ensure the proper functioning of the w Website.	Period until the end of the relevant visitor session	SESSION

	<p>more secure. The scope of the processed and collected data is not significant, the Service Provider uses them only for anonymised statistics and analysis, profiling (collection of behavioural preferences) and automated decision-making does not take place on the basis of these data, nor does the Service Provider send personalised offers to Users on this basis. Therefore, the fundamental rights and freedoms of the User are not disproportionately affected by this processing.</p>			
Statistical cookie	Consent of the data subject (Article 6 (1) a GDPR)	Data collection on the use of the Website. The cookie is hosted by Google LLC	Up to 1 year from the end of the session, depending on the type	Data collected by Google Analytics
Advertising cookie	Consent of the data subject (Article 6 (1) a GDPR)	Show relevant ads. The cookie is hosted by Google LLC and Facebook Inc.	Up to 2 years.	Google Ads conversion and remarketing code, Google Analytics remarketing, Facebook conversion and remarketing code, other Facebook cookies, Instagram

				conversion and remarketing code
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60. Applied cookies:

Name of the cookie	Type of cookie	Processed personal data	Expiry	Purpose
sq-token	Session cookie	no personal data is processed	365 days	Ensures that client-server communication can take place in a correct and secure manner, with no unauthorized access.
sq-allow-cookies	Session cookie	no personal data is processed	365 days	Contains only the result of the cookie consent.
_ga and _ga_CGHCE657QY	Statistical cookie	ClientIDs consisting of a string of numbers unique to each user on your website Number of times and time of day of previous visits to your website Information about how they found your website, their search and browser history IP addresses	2 years	Used by third parties (Google), some of which are generated cookies.
first-vote-show	Session cookie	no personal data is processed	Period until the end of the relevant visitor session	Stores whether the User has already visited the Website at least once. If he or

				she has not seen it, a window will pop up.
view-vote	Session cookie	no personal data is processed	Period until the end of the relevant visitor session	Shows the number of page-appearance after which the poll popup should appear.
vote-ready-id	Session cookie	no personal data is processed	Period until the end of the relevant visitor session	Stores in which poll the User participated.

Google Analytics

61. The Website uses Google Analytics, an analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies, text files that are stored on the User's computer to help the Website analyze how users use the Website.
62. The information generated by the cookie about the use of this Website is usually transmitted to and stored by Google on servers in the United States of America. By activating IP anonymization on the Website, Google will previously shorten the User's IP address within the Member States of the European Union or other states party to the Agreement on the European Economic Area.
63. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States and shortened there. Google will use this information to evaluate the use of the Website, to compile reports on website activity and to provide other services relating to Website and internet usage. Please see the DPA at:

https://www.google.com/analytics/terms/dpa/dataprocessingamendment_20130906.html

Google Ads

64. The Service Provider uses the online advertising program "Google Ads" and the Google conversion tracking service. Google Conversion Tracking is an analytics service provided by Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").
65. When a User accesses the Website through a Google ad, a conversion tracking cookie is placed on their computer. These cookies do not contain any personal data and therefore do not identify the User. Please see the DPA at: https://www.google.com/analytics/terms/dpa/dataprocessingamendment_20200816.html
66. When the User browses certain pages of the Website and the cookie has not expired, Google and the data controller may see that the User has clicked on the ad.

67. The information obtained through the use of conversion tracking cookies is used to provide the Service Provider with conversion statistics. The Service Provider can thus be informed about the number of users who clicked on its advertisement and were redirected to a page with a conversion tracking tag. However, it does not have access to information that would allow it to identify any user.
68. Conversion tracking can be disabled by the User by disabling the possibility to install cookies in the browser.

Social media

69. Data processed: user name and public profile picture registered on Facebook, Instagram, YouTube and other social networking sites.
70. The data processing concerns all users who have registered on the above social networking sites and have "liked" the Website. The Service Provider may collect publicly available information from the social media websites. The User can control the publicity of information indicated on social media sites.
71. The purpose of the data collection is to share, "like" or promote certain content, products, promotions or the Website itself on social networking sites.
72. The processing of data takes place on the social networking sites concerned, so the duration of the processing, the way in which it is carried out and the possibilities for deleting and modifying the data are governed by the rules of the social networking site concerned. The policies and conditions applicable to the Services linked to a particular website shall (also) be applied to the use of any Services accessible through a website other than the Website (e.g. Facebook's own terms of use).
73. The legal basis for the processing is the consent of the data subject to the processing of the social networking sites pursuant to Article 6 (1) (a) of the GDPR.

Rights of the data subject

74. **Right of access by the data subject:** 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:
 - (a) the purposes of the processing;
 - (b) the categories of personal data concerned;
 - (c) 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;
 - (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - (e) 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;
 - (f) the right to lodge a complaint with a supervisory authority;
 - (g) where the personal data are not collected from the data subject, any available information as to their source;

- (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR 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.
 - (i) 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 GDPR relating to the transfer.
75. **Right to rectification:** The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
76. **Right to erasure ('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 the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - (b) 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 GDPR, and where there is no other legal ground for the processing;
 - (c) the data subject objects to the processing pursuant to Article 21 (1) of GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2) of GDPR;
 - (d) the personal data have been unlawfully processed;
 - (e) 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;
 - (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8 (1) of GDPR.
77. 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 data.
78. **Right to restriction of processing:** The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - (c) 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 defense of legal claims;

- (d) the data subject has objected to processing pursuant to Article 21 (1) of GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.
79. **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:
- (a) 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) of GDPR; and
 - (b) the processing is carried out by automated means.
80. **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 personal data concerning him or her which is based on point (e) or (f) of Article 6 (1) of GDPR, 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 defense of legal claims.
81. 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 marketing.
82. **Right to withdrawal:** The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
83. **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. This shall not apply if the decision:
- (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
 - (b) 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
 - (c) is based on the data subject's explicit consent.

Time limit for taking action

84. The Data Controller shall inform the data subject of the measures taken in response to requests covered by this Policy within 1 month of receipt. This period may be extended by 2 months if necessary. The fact and reasons for the extension shall be communicated to the data subject within 1 month of receipt of the request.

85. If the controller fails to take action, it shall inform the data subject of the fact and the reasons thereof without undue delay and at the latest within 1 month of receipt of the request. At the same time, it shall inform the data subject of his or her possible rights of appeal and complaint.

Security of processing

86. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk: only the IT- administrator and the manager of the Service provider have access to the servers.

Communication of a personal data breach to the data subject

87. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.
88. The communication to the data subject referred to in previous paragraph shall describe in clear and plain language the nature of the personal data breach and contain at least the information and measures.
89. The communication to the data subject referred to in paragraph 1 shall not be required if any of the following conditions are met:
- (a) 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 it, such as encryption;
 - (b) the controller has taken subsequent measures 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;
 - (c) it 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.

Notification of a personal data breach to the supervisory authority

90. In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55 of GDPR, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

Trans-border data transfer

91. Information collected via the Website, through direct interactions with the User, or from use of Services may be transferred from time to time to the Service Provider's offices or personnel, or to third parties, located throughout the world, and may be viewed and hosted anywhere in the world, including countries that may not have laws of general applicability regulating the use and transfer of such data. To the fullest extent allowed by applicable law, by using any of the above, the User voluntarily consent to the trans-border transfer and hosting of such information.

Other data processing

92. The Data Controller deletes the received e-mails, messages, data provided by telephone, social networking sites, together with the name and e-mail address of the interested party and other personal data voluntarily provided by the interested party, after a maximum of 5 years from the date of the communication.
93. The Service Provider is obliged to provide information, or to disclose or transfer data, or make documents available, at the request of other authorities (in particular for law enforcement purposes), or on the basis of a legal mandate, taking into account the provisions on legal professional privilege. In this case, the Service Provider shall disclose personal data to the requesting party only to the extent that is strictly necessary to achieve the purpose of the request, provided that the latter has indicated the precise purpose and scope of the data.

Possibility to complain

94. In the event of a breach by the controller, a complaint can be lodged with the supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information

1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: 1363 Budapest, Pf. 9.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

95. 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 them. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.
96. The data subject shall have the right to an effective judicial remedy where he considers that his rights under GDPR have been infringed as a result of the processing of his personal data in non-compliance with GDPR.