

Privacy Notice

Our Company, **Appsters Kft.** (the “Company”), provides this Privacy Notice to explain how we process and protect your personal data. The Company is the data controller in respect of personal data provided to us by our employees, clients, persons requesting quotations, contractual partners, website visitors, users of our applications, and other natural persons who come into contact with us on any legal basis or who contact us through various channels, business contacts or our employees.

In the course of our business activities, we request, obtain and process personal data from various natural persons on different legal bases. In accordance with the principle of data minimisation, the Company seeks to process only the minimum amount of personal data necessary for the performance of its activities. We acknowledge and respect the rights granted to natural persons by applicable legislation in relation to personal data and data protection. These rights are described below; first, however, we set out the meaning of certain important terms.

Term or abbreviation	Explanation
Data Controller	The legal entity that determines the purposes and means of the processing of personal data; in this case, our Company.
Data Subject	A living natural person about whom we hold personal data, including current, former and prospective employees and other persons involved with the Company (clients, suppliers, agents, visitors, partners, etc.) with whom the Company has or may enter into a legal relationship and from whom we collect or receive personal data.
EU	The European Union
GDPR, Hungarian Information Act	The EU General Data Protection Regulation, applicable from 25 May 2018, and Act CXII of 2011 on Informational Self-Determination and Freedom of Information.
Personal Data	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, identification number, location data, online identifier, or one or more factors specific to that person's physical, physiological, genetic, mental, economic, cultural or social identity. Personal Data therefore include data relating to a living person who can be identified from data processed by the Company. Personal Data may be factual (for example, name, address, date or place of birth, mother's name) or opinion-based (for example, a performance evaluation). Other identifiers may also qualify as Personal Data, including biometric identifiers (e.g. fingerprints) and location data.

Processing	Any operation performed on Personal Data, including obtaining, using, viewing, accessing, recording or storing, listing or structuring the data, or any other operation or set of operations, including organisation, alteration, retrieval, use, disclosure, erasure or destruction. Processing also includes transferring Personal Data to a third party.
Data Processor	A natural or legal person, public authority, agency or other body that processes Personal Data on behalf of the Data Controller.
Profiling	Automated processing that uses Personal Data to evaluate or predict aspects concerning an individual's work performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
Pseudonymisation	Processing Personal Data in such a manner that the data can no longer be attributed to a specific Data Subject without the use of additional information. Such additional information must be kept separately and protected against unauthorised use by appropriate technical and organisational measures.
Special categories of Personal Data:	Very strict rules apply to the processing of Personal Data falling within 'special categories'. Such data may include: • data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; • genetic data and biometric data processed for the purpose of uniquely identifying a person, data concerning health, or data concerning a person's sex life or sexual orientation; • data relating to criminal liability or convictions.
Supervisory Authority	Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
Third Country	Any country outside the EU
Data Transfer:	Transfer of Personal Data by the Data Controller or Data Processor to a legal entity outside the EU.

Our Company acts both as a data controller and as a data processor. Its details are as follows:

Company name:	Appsters Mobiltartalom-fejlesztő Korlátolt Felelősségű Társaság
Represented by: Registered office:	Áron Bubla, Managing Director 1023 Budapest, Lukács utca 4, 3rd floor, door 8.
Person responsible for the content of this Notice:	Áron Bubla, Managing Director
Effective date of this Notice: Amended:	25 May 2018 14 January 2020

Please note that the Company has not appointed a Data Protection Officer.

You are entitled to statutory rights for the protection of your personal data. These rights are described below.

1.) Statutory rights of Data Subjects in relation to the protection of their personal data:

Data Subjects have the following rights in relation to their personal data:

- a) a) Right to appropriate and comprehensive information
- b) b) Right of access to personal data
- c) c) Right to rectification and completion of inaccurate or incomplete data
- d) d) Right to erasure (right to be forgotten) subject to certain statutory conditions
- e) e) Right to withdraw consent
- f) f) Right to request restriction of processing
- g) g) Right to object to processing
- h) h) Right not to be subject, upon request, to automated decision-making and to request human intervention
in the decision-making process
- i) Right to data portability
- j) j) Right to lodge a complaint with the Supervisory Authority
- k) k) Right to a judicial remedy against a data controller or data processor

In relation to any of the above rights, you may submit a request to us. We will respond without undue delay and in any event within 25 days, and in exceptionally complex cases we will comply with your request within three months. Our response will be provided electronically or by another method requested by you. No fee will be charged for the first request; however, we reserve the right to charge an administrative fee for repeated requests submitted within one year or for requests that are manifestly unfounded or excessive.

Please also note that, in order to accept and process your request, we must identify you and verify your identity. Without such verification, we are unable to accept or process your request.

If the Company concludes that it is not required to act on your request, we will inform you in writing of the reasons for our decision and of the remedies available to you.

If you nevertheless believe that the Company should take action on your request, or that we have acted improperly in relation to your personal data or the protection of your data, please contact us so that we can investigate and remedy the matter. You may submit a formal complaint by e-mail or post using the contact details below. We will deal with your complaint promptly and respond without undue delay, and in any event within one month.

1. a) Right to appropriate and comprehensive information

We provide all information required by the GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Information is provided in writing or electronically, or, at your request, may also be provided orally.

1. b) Right of access to personal data

You have the right to obtain confirmation from the Company as to whether personal data concerning you are being processed and, where that is the case, to access those data and obtain detailed information on the following:

- The purposes of the processing

- The categories of personal data concerned
- The recipients to whom the personal data have been or will be disclosed
- The period for which the personal data will be stored
- Your right to request rectification or erasure of your personal data, to request restriction of processing, or to object to such processing
- Your right to lodge a complaint with the Supervisory Authority
- Where the personal data are not collected directly from you, the source of those data
- Whether automated decision-making has taken place on the basis of the data and, if so, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you
- Where your personal data are transferred to a country outside the EU, we provide appropriate safeguards to protect your rights

1. c) Right to rectification and completion of inaccurate or incomplete data

If we hold inaccurate or incomplete personal data about you, we will rectify or complete them without undue delay after receiving your request.

1. d) Right to erasure (right to be forgotten) subject to certain statutory conditions

You have the right to request the erasure of your personal data without undue delay where one of the following grounds applies:

- Your personal data are no longer necessary in relation to the purposes for which they were originally processed
- You withdraw your consent and there is no other legal ground for the processing
- The processing is based on our legitimate interests and you object on the ground that there are no overriding legitimate grounds for the processing which take precedence over your interests, rights and freedoms; or the processing is for direct marketing purposes and you object to such processing
- Your personal data have been unlawfully processed
- Your personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to us
- The lawfulness of our processing is based on consent given by the holder of parental responsibility for a child and either (i) you are the person with parental responsibility and the child has not yet reached the age at which they may consent, or (ii) you are the child and have reached the age at which consent may be given. (In Hungary, the minimum age for consenting to the processing of personal data is 16.)

Please note that we cannot comply with a request for erasure and cannot erase your personal data where processing is necessary for any of the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation requiring the processing of personal data;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the request would be likely to render impossible or seriously impair the achievement of the purposes of that processing; or
- for the establishment, exercise or defence of legal claims.

Where your request can be fulfilled, your data will be erased. For a short transitional period after erasure (maximum 30 days), your data may remain in backup copies; however, appropriate IT security measures ensure that such copies can only be accessed for the purpose of restoring the database in the event of data loss and cannot be copied for the purpose of disclosing the data. Following final deletion, your data will be irreversibly destroyed.

1. e) Right to withdraw consent

Where you have consented to our processing of your personal data, you may withdraw your consent at any time by sending your request to the e-mail address below or by post.

Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

1. f) Right to request restriction of processing

You may request that the Company restrict the processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data
- The processing is unlawful and you oppose erasure of the data and request restriction of their use instead
- We no longer need the personal data for the original purposes, but you require them for the establishment, exercise or defence of legal claims
- You object to processing based on our 'legitimate interests' and claim that your interests, rights and freedoms override those interests.

Where processing is restricted as a result of your objection, such personal data may, with the exception of storage, be processed only with your consent, except where processing is necessary:

- for the establishment, exercise or defence of legal claims; for the protection of the rights of another person; or
- for reasons of important public interest of the Union or of a Member State.

In such cases, we will inform you promptly before the restriction is lifted.

1. g) Right to object to processing

You have the right to object to our processing of your personal data where:

- The processing is based on our legitimate interests, but you claim that your interests, rights and freedoms override those interests
- Your data are processed for direct marketing purposes, including profiling insofar as it is related to such direct marketing.

1. h) Right not to be subject, upon request, to automated decision-making and to request human intervention in the decision-making process (the Company does not currently use automated decision-making; this information applies only if such processing is introduced)

You may request not to be subject to a decision based solely on automated processing that produces legal effects concerning you, and you may request human intervention in the decision-making process.

This does not apply where:

- the decision is necessary for entering into or performing a contract between you and us; or
- the automated process is authorised by Union or Member State law which also lays down suitable measures to safeguard your rights and

freedoms and legitimate interests.

In the first case, we must implement suitable measures to safeguard your rights, freedoms and legitimate interests, including at least your right to obtain human intervention on our part, to express your point of view and to contest the decision.

1. i) Right to data portability

Under applicable law, the Data Subject has the right, in specified circumstances, to receive personal data concerning them in a structured, commonly used and machine-readable format. The Data Subject also has the right to have those data transmitted directly from one controller to another, where technically feasible.

1. j) Right to lodge a complaint with the Supervisory Authority

If you believe that we have acted unfairly or unlawfully towards you in breach of applicable data protection law, you may lodge a complaint with the data protection Supervisory Authority. You may contact the following authority:

Hungarian National Authority for Data Protection and
Freedom of Information (NAIH)
H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Postal address: 1530 Budapest, P.O. Box 5.
Telephone: +36 1 391 1400
Fax: +36 1 391 1410
English-language e-mail: privacy@naih.hu
Hungarian-language e-mail: ugyfelszolgalat@naih.hu
Website: <http://naih.hu>

1. k) Right to a judicial remedy against a controller or processor

If you believe that, as a result of improper processing of your personal data, we have infringed your rights relating to the protection of personal data, you are entitled, in addition to the remedies described above, to seek judicial redress.

Such proceedings fall within the jurisdiction of the competent regional court. At the Data Subject's choice, proceedings may also be brought before the regional court having jurisdiction over the Data Subject's residence or place of stay. A person who would otherwise lack litigation capacity may also be a party to the proceedings. The Authority may intervene in the proceedings in support of the Data Subject.

1.1. Contact details for data protection matters:

Postal address: 1023 Budapest, Lukács
utca 4.
E-mail: info@appsters.me
Telephone: +36 20 475 2093
Employee responsible for data protection matters: Áron Bubla, Managing Director

The following section describes the types of processing activities carried out by the Company that may concern you.

2.) 2.) Processing activities

2.1. Contact details

You may contact us through any of our contact channels (by e-mail, via Facebook, by telephone or by post). In such cases, we consider that you consent to the processing of the personal data you share with us.

Purpose of processing:

To maintain contact with the person making the enquiry, answer or resolve the question/request, and provide information.

Legal basis for processing:

As you initiate the contact, the legal basis for the processing is your presumed voluntary consent. You may withdraw your consent at any time; however, in that case we may be unable to answer your question or provide information. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

Retention period, method of storage and data security measures:

Messages and personal data received in this way are deleted one year after the end of the calendar year in which the relevant request, question or complaint was answered. Where, however, the nature of the correspondence requires retention for tax or accounting reasons, or for the protection of the rights or interests of the Company or the person making the enquiry, the correspondence will be archived and retained for the period considered necessary on a case-by-case basis.

Method of storage: electronically and/or in paper form.

Data transfer: your data are not transferred in connection with ordinary enquiries.

Types of data: personal data voluntarily provided by you, such as:

name, telephone number, e-mail address and any other data
you provide to us.

Data Subjects: persons contacting the Company.

Source of data: the person who contacts us provides the data directly; therefore, the source of the data is the Data Subject.

Who may access the data?

The Managing Director and the controller's employees and contributors, insofar as relevant to their respective areas of responsibility.

Possible consequence of failure to provide data: we may be unable to answer the question or request submitted during the contact, fulfil your request or process your data.

2.2. Issuing accounting documents

Purpose of processing: issuing invoices in connection with the provision of services or the sale of products.

Legal basis for processing: Article 6(1)(c) GDPR – compliance with a legal obligation.

Retention period, method of storage and data security measures: at least 8 years, electronically and in paper form.

Data transfer: none.

Types of data:

Name
Residential address
Tax number
E-mail address

Data Subjects: persons providing data for the issuance of an invoice and recipients of the service.

Source of data: Data Subjects.

Who may access the data? The Managing Director and financial management.

Possible consequence of failure to provide data: the Company will be unable to comply with its statutory obligations and, as a result, will also be unable to provide the service.

2.3. Accounting and bookkeeping activities

Purpose of processing: issuing and recording invoices in connection with the provision of services or sale of products, and preparing financial statements.

Legal basis for processing:

Article 6(1)(c) GDPR – compliance with a legal obligation.

Retention period, method of storage and data security measures:

At least 8 years, electronically and in paper form.

Data transfer: to the accounting firm acting as accounting service provider.

Types of data:

Name
Residential address
Tax number
E-mail address

Data Subjects: recipients of the service.

Source of data: Data Subjects.

Who may access the data?

Managing Director
Financial management
Employees and contributors of the accounting service provider

Possible consequence of failure to provide data: the Company will be unable to comply with its statutory obligations.

2.4. Certifications (e.g. ISO)

Purpose of processing: quality assurance.

Legal basis for processing: Article 6(1)(f) GDPR (legitimate interests).

Retention period, method of storage and data security measures: 5 years after termination of the civil-law relationship with the supplier concerned, pursuant to Section 6:22(1) of the Hungarian Civil Code.

Data transfer: where necessary, to a provider of legal services.

Types of data: name of the Data Subject, mother's name, place and date of birth, residential address, personal data related to the subject matter of the audit, and a copy of the diploma.

Data Subjects: employees, recipients of services and persons assessing services.

Source of data: Data Subjects.

Who may access the data? The Managing Director and, where applicable, external contractors engaged for certification purposes.

2.5. Tenders and public procurement procedures

Purpose of processing: participation in calls for tenders and public procurement procedures.

Legal basis for processing: Article 6(1)(f) GDPR (legitimate interests).

Retention period, method of storage and data security measures: in the case of an unsuccessful bid, the data are deleted immediately; if the bid is successful, the data are retained for the entire duration of the project and until the end of the required maintenance period.

Data transfer: to the contracting authority or entity issuing the tender.

Types of data: contact details of persons preparing the tender documentation (name, e-mail address, telephone number).

Data Subjects: employees, persons involved in tender work and contact persons in connection with tenders.

Source of data: Data Subjects.

Who may access the data?

Managing Director
Company Manager
Integrated Management System (IMS) Manager
Office Manager

Possible consequence of failure to provide data: the Company may lose a market opportunity because it is unable to participate in the tender.

2.6. Job advertisements

You may apply for vacancies advertised by the Company.

Purpose of processing: to provide job seekers with information about advertised vacancies, select suitable applicants and communicate with applicants during the recruitment process.

Legal basis for processing:
voluntary consent.

If you contact us by telephone or in person and no further discussion takes place, we do not process your data and do not retain them. If you contact us through our Facebook page, we may see the data you have made publicly available on Facebook, but we do not process those data.

If, following the initial contact, a further meeting takes place, your written consent is required for the processing of your data. The relevant information and consent form will be provided to you at the personal meeting. We follow the same procedure for applications submitted by e-mail or in paper form: consent is given expressly by signing or otherwise completing the consent declaration provided by us. You may withdraw your consent at any time by e-mail or letter and may request deletion of your registration at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal. Providing data is voluntary; however, if you withdraw your consent or fail to provide a document or data requested by us, we may be unable to assess your application.

Retention period:

CVs and personal data and documents uploaded or submitted in connection with applications for a specific vacancy are processed after the successful candidate has been selected as follows:

- Unsuccessful applicants are asked by e-mail, system notification or in paper form whether they wish their application to be retained in our database for a further one year. If a negative response is received within 30 days, or no response is received, the application and the applicant's data are deleted from the system within a further 7 days.
- The successful applicant's data are transferred to the employee records and removed from the applicant database.

Processing of general applications not submitted for a specific vacancy:

- Applications submitted by post or e-mail that include a request to be entered in our records are retained in our database for one year. After one year, the CV and data provided in this way are deleted.

Data transfer: no data transfer takes place in this case.

2.7. Business contacts

Like most companies, the Company maintains business relationships with certain employees of other organisations and stores their names, business positions and contact details.

Types of data: name, telephone number, e-mail address and company name.

Purpose of processing:

Such data are stored with the consent of the person concerned in order to enable communication between our companies for cooperation purposes.

Legal basis for processing:

The legal basis for this processing is the performance of a contract or the legitimate interest in maintaining contact between the companies.

We store the contact details of these business contacts solely to facilitate the establishment and maintenance of business cooperation with their companies. For example, we do not use their data for marketing activities directed at these contacts and do not transfer their data to third parties.

Retention period:

We review the contact details of our business contacts at least annually and remove from our systems any details that are no longer current because the business relationship has ended or the data are no longer up to date.

2.8. Website

Our website uses basic cookies. We do not have access to the underlying data processed by these cookies; we receive aggregated visitor statistics through Google Analytics.

If you would like further or more detailed information, please contact the Company using any of the contact details set out in Section 1.1 above.

3.) 3.) Processing and protection of personal data:

The Company ensures the security of personal data by implementing the technical and organisational measures and procedural rules necessary to give effect to data protection and data security requirements. Protection measures are designed in particular to prevent unauthorised access, alteration, disclosure or deletion, as well as damage to or destruction of the data.

In order to protect our clients' interests, we do not disclose information relating to the identity of our clients by telephone.

4.) 4.) Our data controller partners and data processors

In order to comply with our statutory obligations, it may be necessary to transfer certain data. This section explains to whom certain personal data may be transferred.

National Tax and Customs Administration of Hungary (NAV), 1132 Budapest, Váci út 48/c-d.

TLI International Consulting Pénzügyi Tanácsadó Korlátolt Felelősségű Társaság, accounting firm, 1194 Budapest, Kelet utca 43. Company registration number: 01-09-944574.

BlueRay Infokommunikációs Tanácsadó, Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság. Registered office: 1141 Budapest, Gödöllői utca 139, ground floor 1. Company registration number: 01-09-720339.

HORIZONT Informatika Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság. Registered office: 4034 Debrecen, Repce utca 3. Company registration number: 09-09-010685.

eSolution Számítástechnikai és Szolgáltató Korlátolt Felelősségű Társaság.
Registered office: 1119 Budapest, Fehérvári út 131, ground floor 3.
Company registration number: 01-09-694209.

The Company also acts as a data processor. The relevant information is set out below:

When acting as a data processor, we provide the same level of data protection to the controllers for whom we process data as we apply when acting as a controller ourselves. We fully implement the data security measures set out in the data processing agreement and applicable legislation.

If you require more detailed information, please contact the Company using the contact details provided above so that we can answer your questions appropriately.