# PRIVACY POLICY

# Purpose of the data management information

Donau Lab Ltd. (address: 1116 Budapest, Fehérvári út 120.) as data controller, it accepts that it is bound by the content of this legal notice. It undertakes that all data processing related to its activities complies with the requirements set out in this Policy and in the national legislation in force, as well as in european union acts.

The privacy policy related to the data processing of Donau Lab Kft. is continuously available at the <u>http://donaulab.hu</u> address.

Donau Lab Kft reserves the right to change this notice at any time. If you have any questions about this communication, please write to us and our colleague will answer your question.

Donau Lab Kft. is committed to the protection of the personal data of its clients and partners, and considers it extremely important to respect its clients' right to informational selfdetermination. Donau Lab Kft. treats personal data confidentially and takes all security, technical and organizational measures that guarantee the security of the data. Donau Lab Kft. describes its data management practices below.

## Data of the controller

If you would like to contact our Company, you can contact the data controller at the postal address, e-mail and telephone number.

Name: Donau Lab Ltd. Registered office: 1116 Budapest, Fehérvári út 120. Company registration number: 01-09-262144 Tax number: 10828601-2-43 Phone number: +36 1 3191718 E-mail: offive-hu@donaulab.com

# Scope of personal data processed

Donau Lab Ltd. processes the following personal data in its customer relations: name, telephone number, email address, workplace name, address, telephone number, position, details of the devices and equipment purchased from Donau Lab Kft., correspondence during contact.

## **Technical data**

Donau Lab Kft. selects and operates the IT tools used for the processing of personal data in the course of providing the service in such a way that the processed data:

- accessible to authorised persons (availability);
- authenticity and authentication are ensured (authenticity of data processing);
- can be verified (data integrity);
- protected against unauthorised access (confidentiality of data).

Donau Lab Kft. protects the data by appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction.

Donau Lab Kft. provides technical, organizational and organizational measures to protect the security of data management, which provides a level of protection appropriate to the risks associated with data processing.

Donau Lab Ltd. retains the

- confidentiality: protects information so that it can only be accessed by those who are entitled to it;
- integrity: protects the accuracy and completeness of the information and the method of processing;
- availability: ensures that, when the authorised user needs it, he or she can really access the information they want and have the means to do so.

# Cookies

The task of cookies

- collect information about visitors and their devices;
- note the individual preferences of visitors, which are used(s) e.g. when using online transactions, so that they do not have to be re-typed;
- facilitate the use of the website;
- quality user experience.

In order to provide customized service, the user places a small data package, called a cookie, on his computer and reads it back during the subsequent visit. If the browser returns a previously saved cookie, the service provider handling the cookie has the possibility to link the user's current visit with the previous one, but only with respect to its own content.

Duration of data processing

The data storage time of the given cookie, more information is available here:

Google General Cookie Notice:

https://www.google.com/policies/technologies/types/ Google Analitycs factsheet: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu Facebook factsheet: https://www.facebook.com/ads/preferences/?entry\_product=ad\_settings\_screen

## Legal background and legal basis of cookies:

The legal basis for data processing is your consent under Article 6(1)(a) of the Regulation.

## The main characteristics of the cookies used by the website are:

**Strictly necessary cookies for**operation: These cookies are essential for the use of the website and allow the use of the basic functions of the website. In the absence of these, many features of this site will not be available to you. The lifetime of these types of cookies is limited to the duration of the session.

**Cookies to improve the user**experience: These cookies collect information about the user's use of the website, such as which pages he visits most often or what error message he receives from the website. These cookies do not collect information identifying the visitor, i.e. they work with completely general, anonymous information. The data obtained from these data is used to improve the performance of the website. The lifetime of these types of cookies is limited to the duration of the session.

## Third-party cookies (analytics)

**Google Adwords cookie** When someone visits our site, the visitor's cookie ID is added to the remarketing list. Google uses cookies, such as NID and SID cookies, to customize ads in Google products, such as Google Search. For example, you use these cookies to remember

your recent searches, your previous interactions with individual advertisers' ads or search results, and your visits to advertisers' websites. AdWords conversion tracking uses cookies. Cookies are saved on the user's computer when that person clicks on an ad to track sales and other conversions from the ad. Some common uses of cookies are: selecting ads based on what's relevant to a user, improving campaign performance reports, and avoiding ads that a user has already viewed.

**Google Analytics** cookie: Google Analytics is Google's analytics tool that helps website and app owners get a more accurate picture of their visitors' activities. The service may use cookies to collect information and report statistics about your use of the website without individually identifying visitors to Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reporting website usage statistics, Google Analytics, along with some of the ad cookies described above, can also be used to serve more relevant ads across Google products such as Google Search and across the web.

**Remarketing**cookies: May appear to previous visitors or users when browsing other websites on the Google Display Network or searching for terms related to their products or services

**Session cookie:** These cookies store the visitor's location, browser language, payment currency, their lifetime is to close the browser or for a maximum of 2 hours.

**Mobile version, design cookie**: Detects the visitor's used device and switches to full view on mobile. Its lifespan is 365 days.

**Cookie Acceptance**Cookie: Upon arrival at the site, you accept the cookie storage statement in the warning window. Its lifespan is 365 days.

**Facebook pixel (Facebook cookie)** A Facebook pixel is a code that allows a website to report conversions, build audiences, and provide the page owner with detailed insights into visitors' use of the website. The Facebook pixel allows you to display personalized offers and advertisements to visitors of the website on facebook. You can study Facebook's privacy policy here: <u>https://www.facebook.com/privacy/explanation</u>

If you do not accept the use of cookies, some features will not be available to you. For more information on how to delete cookies, please refer to the following links:

- Internet Explorer: <u>http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11</u>
- Firefox: <u>https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer</u>
- Mozilla: <u>https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito</u>
- Safari: <u>https://support.apple.com/kb/ph21411?locale=en\_US</u>
- Chrome: <u>https://support.google.com/chrome/answer/95647</u>

# Newsletter-related data

Name of the company operating the newsletter system: The Rocket Science Group LLC Newsletter system company headquartered at 675 Ponce de Leon Avenue Northeast, Suite 5000 Atlanta, GA 30308 United States

The Data Processor contributes to the sending of newsletters on the basis of a contract with Donau Lab Kft. In doing so, the Data Processor handles the name and e-mail address of the data subject to the extent necessary for the newsletter wedding.

# Purpose, method and legal basis of data processing

General data management policies

The data processing of donau lab kft.'s activities is based on voluntary consent or legal authorization. In the case of data processing based on voluntary consent, the data subjects may withdraw their consent at any stage of the processing.

In some cases, the processing, storage and transmission of a set of data provided is mandatory by law, about which we inform our clients separately.

We call Donau Lab Ltd. that if they do not provide their own personal data, the data provider is obliged to obtain the consent of the data subject.

Its data management principles are in accordance with applicable data protection legislation, in particular:

- Act CXII of 2011 on the right to informational self-determination and freedom of information (Infotv.);
- Regulation (EU) No 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 the free movement of such data and repealing Regulation (EC) No 95/46 (General Data Protection Regulation, GDPR);
- Act V of 2013 on the Civil Code (Civil Code);
- Act C of 2000 on Accounting (Nov. tv.);
- Act LIII of 2017 on the Prevention and Prevention of Money Laundering and Terrorist Financing (Pmt.);
- Act CCXXXVII of 2013 on Credit Institutions and Financial Undertakings (Hpt.).

## Physical storage locations of data

Your personal data (i.e. data that may be related to you) may be processed in the following way: on the one hand, technical data relating to the computer, browser, internet address, pages visited by you in connection with the maintenance of the internet connection are automatically generated in our computer system, and on the other hand, you can also provide your name, contact details or other data if you wish to make a personal connection when using the website. move on with us.

Data technically recorded during the operation of the system: data of the data subject's logon computer recorded as an automatic result of technical processes. The data to be automatically recorded will be automatically logged at the time of entry or exit without a separate statement or action by the data subject. This data may not be linked to other personal user data, except in cases required by law. Only Donau Lab Kft. has access to the data.

## Rights and enforcement possibilities of the data subject

Within the period of data processing, you have the following rights according to the provisions of the Regulation:

- right to withdraw consent
- access to personal data and information related to data processing
- right to rectification
- restriction of data processing,
- right to erasure
- right to protest
- right to portability.

If you wish to exercise your rights, this will be accompanied by your identification and donau

lab ltd. -you need to communicate with you. Therefore, personal data will be required for identification (but the identification can only be based on data that the Data Controller processes about you anyway) and Donau Lab Kft. your complaint about data processing will be available in your email account within the period indicated in this notice in connection with the complaints. If you were a customer and would like to identify yourself for complaint handling or warranty administration, please provide your order ID for identification. We can use this to identify you as a customer.

The Data Controller will respond to complaints about data processing within 30 days at the latest.

# **Right to information**

Donau Lab Kft. shall take appropriate measures to provide the data subjects with all the information on the processing of personal data referred to in Articles 13 and 14 of the GDPR and all the information referred to in Articles 15-22 and 34 in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner.

## Right of access of the data subject

You are entitled to a Donau Lab Ltd. -receive feedback from him as to whether or not his personal data is being processed and, if data processing is in progress, he or she has the right to:

- have access to the personal data processed and
- about donau lab ltd. inform:
- the purposes of data processing;
- categories of personal data processed about you;
- information about the recipients or categories of recipients to whom the Controller has communicated or will communicate the personal data;
- the planned period for which the personal data will be stored or, if this is not possible, the criteria for determining that period;
- your right to apply to Donau Lab Ltd. -from the rectification, erasure or restriction of the processing of personal data relating to you, and in the case of processing based on a legitimate interest, you may object to the processing of such personal data;
- the right to lodge a complaint with the supervisory authority;
- if the data was not collected from you, all available information about their source;
- the fact of automated decision-making (if such a procedure is used), including profiling, and, at least in these cases, understandable information about the logic used and the significance of such processing and the likely consequences for you.

The purpose of exercising the right may be to establish and verify the lawfulness of data processing, therefore, in case of repeated requests for information, Donau Lab Kft. in exchange for the provision of the information.

Access to personal data is provided by Donau Lab Ltd. by sending you the personal data and information processed by email after you have been identified. If you have a registration, we will provide you with access so that you can view and verify the personal data processed about you by logging into your user account.

Please indicate in your request that you request access to the personal data or request information related to the processing.

## **Right to rectification**

You have the right to request the use of Donau Lab Ltd. correct inaccurate personal data about you without delay.

# Right to erasure

The data subject is entitled to receive the right, at the request of Donau Lab Kft., to act on one of the following grounds: delete personal data relating to him without undue delay:

- personal data are no longer necessary for the purposes from which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there is no overriding legitimate reason for the processing;
- the personal data have been processed unlawfully;
- personal data must be deleted in order to comply with a legal obligation imposed by Union or Member State law applicable to the controller;
- personal data were collected in connection with the provision of information society services.

Erasure of data cannot be initiated if processing is necessary: for the purpose of exercising the right to freedom of expression and information; to fulfil an obligation under Union or Member State law applicable to the controller requiring the processing of personal data or to carry out a task carried out in the public interest or in the exercise of official authority conferred on the controller; for purposes of public health or archiving, scientific and historical research or statistical purposes, on grounds of public interest; or to bring, enforce or defend legal claims.

# Right to restrict data processing

At the request of the data subject, Donau Lab Ltd. restrict data processing if one of the following conditions is met:

- the data subject disputes the accuracy of the personal data, in which case the restriction is based on the
- which allows the accuracy of personal data to be verified;
- the processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use;
- the controller no longer needs the personal data for the purposes of data processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate reasons of the controller take precedence over the legitimate reasons of the data subject.

Where processing is restricted, personal data may be processed with the consent of the data subject, with the exception of storage, or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person, or in the important public interest of the Union or of a Member State.

## Right to data portability

If the processing is carried out by automated means, or if the processing is based on your voluntary consent, you have the right to request from the Data Controller that the data processing by you is A Donau Lab Kft. data provided to you, which the Data Controller provides to you in xml, JSON or CSV format, if this is technically feasible, you can request that Donau Lab Kft. transfer the data in this form to another controller.

## Right to object

The data subject shall have the right to object at any time, for reasons relating to his or her situation, to the processing of his or her personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority conferred on the

controller, or to the processing necessary for the enforcement of the legitimate interests of the controller or a third party, including profiling based on those provisions. In the event of a objection, the controller may no longer process the personal data unless it is justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the data subject or which relate to the establishment, exercise or defence of legal claims.

Automated decision-making in individual cases, including profiling

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

# **Right of withdrawal**

The data subject shall have the right to withdraw his or her consent at any time.

# Right to go to court

In the event of a violation of the data subject's rights, the data subject may apply to the court against the controller. The court will hear the case out of turn.

## Data protection authority procedure

Complaints can be lodged with the National Authority for Data Protection and Freedom of Information:

- Name: National Authority for Data Protection and Freedom of Information
- Registered office: 1125 Budapest, Elisabeth Szilágyi fasor 22/C. Mailing address: 1530 Budapest, Pf.: 5.
- Phone: 0613911400
- Fax: 0613911410
- E-mail: ugyfelszolgalat@naih.hu Website: http://www.naih.hu

## Other provisions

We will provide information about data processing not listed in this notice when the data is collected.

We inform our clients that the court, the public prosecutor, the investigating authority, the infringement authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, the National Bank of Hungary or other bodies may contact the data controller for the purposes of providing information, disclosing data, handing over data or making documents available.

Donau Lab Kft. will only disclose personal data to the authorities if the authority has indicated the exact purpose and scope of the data, only to the extent and to the extent necessary to achieve the purpose of the request.

This document contains all relevant data processing information in accordance with the General Data Protection Regulation 2016/679 of the European Union (hereinafter referred to as the Regulation). GDPR) and 2011 CXII. tv. ('Infotv.').