

the Braze IT Solutions Ltd.
products and services'

PRIVACY POLICY

Effective: from 1 October 2022

TABLE OF CONTENTS

GENERAL PROVISIONS	2
INTERPRETATIVE PROVISIONS	2
THE PURPOSE OF THE PROCESSING, THE SCOPE OF THE PERSONAL DATA PROCESSED BY THE COMPANY	3
LEGAL BASIS AND METHOD OF PROCESSING	5
THE PRIVACY POLICY APPLIED BY THE COMPANY	6
THE DURATION OF THE PROCESSING	7
DATA TRANSMISSION	7
PROTECTION OF PERSONAL DATA	7
THE RIGHTS OF THE CUSTOMER	8
RECIPIENTS	10
CONTACT	11
OTHER PROVISIONS	11

GENERAL PROVISIONS

Braze IT Solutions Kft. (headquarters: 1137 Budapest, Jászai Mari tér 5-6., company registration number: 01-09 278149, tax number: 24204318-2-41, hereinafter referred to as the "**Company**"), as data controller (hereinafter referred to as the "**Controller**"), is subject to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council 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, hereinafter referred to as the "**GDPR**") and the Hungarian Act on the Right to Information Self-Determination and Freedom of Information of 2011. CXII of 2011 (hereinafter referred to as the "Infotv."), the Company has drawn up the following Privacy Policy.

This Privacy Policy applies to the processing of personal data provided by the Customer to the Company, as well as to all personal data collected by the Company either through the website available at my.brazeit.hu, or when filling in order forms and forms or through the use of 'Cookies'.

INTERPRETATIVE PROVISIONS

1. For the purposes of this Privacy Policy:
 - **Personal data:** any information relating to an identified or identifiable natural person ("receptient"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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;
 - **Processing:** any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, storage, adaptation or alteration, use, retrieval, consultation, disclosure, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
 - **Controller:** the natural or legal person, public authority, agency or any 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 the processing are determined by EU law or member state law, the controller or the specific criteria for the designation of the controller may also be determined by EU law or member state law;
 - **Processor:** a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

- **Data destruction:** the complete physical destruction of the data holder containing the data;
- **Transfer:** making data available to a specified third party;
- **Data erasure:** making data unrecognisable in such a way that it is no longer possible to recover it;
- **Customer:** a natural person who orders one of the Company's Services via the online interface and, in the course of this, provides the data listed in section 4 below (recipient);
- **Online platform:** the website operated by the Company <http://my.brazeit.hu>

THE PURPOSE OF THE DATA PROCESSING, THE SCOPE OF THE PERSONAL DATA PROCESSED BY THE COMPANY

2. Anyone may access the Company's website without providing any personal data and may obtain information freely and without restriction on the website and its linked pages.
3. The Company processes personal data during the ordering process on the website, with the express consent of the Customer and on the basis of the General Terms and Conditions.
4. Purpose of the processing:
 - a) to **provide the services available through the Company's my.brazeit.hu online platform, to identify the Customer, to issue invoices and to contact and communicate with Customers** We use the data provided, for example, to confirm your registration, to send you information about the Services, to update your data, to send you system messages as part of the Services, to send you reminders about the Services or to respond to your requests for information

What data we process when you place an Order:	On what basis we process this data (legal basis):	How long we process this data (duration):	To whom we transfer this data (data transfer, onward transfer):
Customer name, e-mail address, telephone number, password, address, tax number,	The processing is necessary for the performance of the General Terms and Conditions of use of the Website and of the	We will keep your data for 5 years from the date of termination of the Service, given that this is the period within which a civil claim may arise in	An accounting company for our company. For our billing partner. As well as for Data

telephone number, IP address	Services (and the Domain Registration Policy annexed thereto) concluded with you or for taking steps at your request prior to the conclusion of the General Terms and Conditions of use of the Website and of the Services (Article 6(1)(b) of the General Data Protection Regulation).	relation to the Order, so the data will remain retrievable.	Processors in point 26.
------------------------------	---	---	-------------------------

b) **to support administrative and legal purposes**, such as billing, or fraud prevention screening, security and protection purposes

What data we process when you place an Order:	On what basis we process this data (legal basis):	How long we process this data (duration):	To whom we transfer this data (data transfer, onward transfer):
Transaction identifier, credit card number, credit card holder, payment amount, payment date, IP address, unique payment identifier, unique payer identifier	The processing is necessary for the performance of the General Terms and Conditions of Use/Order concluded with you for the use of the Website and the Services or for taking steps at your request prior to the conclusion of the General Terms and Conditions/Order (Article 6(1)(b) of the General Data Protection Regulation)	With regard to the users of the services, the data controller and the Customer shall keep financial records for 8 (eight) years from the date of performance of the contract concluded between us, given that the retention of invoices and other financial records relating to purchases is 8 years under Act C of 2000.	Paylike (Paylike ApS, P. O. Pedersensvej 14, Skejby, 8200 Aarhus N, Denmark) is a financial services provider

c) **to send you newsletters** (the data processed for this purpose: e-mail address)

What data we process when you place an Order:	On what basis we process this data (legal basis):	How long we process this data (duration):	To whom we transfer this data (data transfer, onward transfer):
email address	With the consent of the Customer. Article 6(1)(a) of the General Data	5 years, but the Customer (Subscriber) has the	ActiveCampaign, LLC 1 North Dearborn Street 5th Floor

	Protection Regulation	right to unsubscribe at any time.	Chicago, IL 60602
--	-----------------------	-----------------------------------	-------------------

d) data processing related to complaint handling, complaint, customer service: the Customer submitting a complaint, or using customer service (e.g. inquiring about a service), reporting an incident, using an alternative dispute resolution forum

What data we process when you place an Order:	On what basis we process this data (legal basis):	For how long we process this data (duration):	To whom we transfer this data (data transfer, onward transfer):
Name of the person lodging the complaint or claim - Name - E-mail address	Complaints: the legal basis for the processing of data is the fulfilment of the legal obligation of the Data Controller pursuant to Article 17/A (7) of Act CLV of 1997 on Consumer Protection.	In the case of complaints: for 5 years from the start of the complaint (statutory time limit).	Our company will not transfer this data, except in the case of a legal obligation (e.g. a data protection incident).

5. The data controllers shall not use the personal data provided for purposes other than those described in this point. If the controller intends to use the Customer's personal data for a new purpose not covered by this Privacy Policy, the controller shall notify the Customer in writing prior to the new processing, explaining to the Customer the conditions that apply to the new processing. If necessary, it shall obtain the consent of the Customer before starting the new processing activity.
6. The Company may collect non-personally identifiable information about visitors to its online sites, other than personal data, automatically and without limitation, and may automatically (i.e. not by registration) record technical information that is not identifiable (such as the type of browser and operating system used by visitors to its online sites, or the website address from which they came to the Company's online site).

LEGAL BASIS AND METHOD OF PROCESSING

7. The legal basis for the processing activities of the data referred to in points 4(a) to 4(d) of this Privacy Policy is **Article 6 (1) (b) of the GDPR**, which provides that the data processing activities are necessary for the performance of the General Terms and Conditions / Order for the Services or for taking the steps at your request prior to the conclusion of the General Terms and Conditions of Use/Order.

8. Personal data whose processing is necessary for compliance with a legal obligation to which the controller is subject or for the purposes of the legitimate interests pursued by the controller or by a third party (where such interests are proportionate to the restriction of the right to the protection of personal data) may be processed without further specific consent and even after consent has been withdrawn.
9. Data controllers do not verify the personal data provided to them. The person providing the data is solely responsible for the correctness of the data.
10. By providing an e-mail address, any Customer also assumes responsibility for ensuring that only the Customer uses the e-mail address provided. With regard to this assumption of responsibility, any liability for accessing the service from a given e-mail address shall be borne solely by the Customer who registered the e-mail address.

THE PRIVACY POLICY APPLIED BY THE COMPANY

11. The Company respects the rights of visitors to the online sites operated by the Company and the rights of its Customers as defined by law.
12. The Company uses personal data that are indispensable for the use of the Company's services on the basis of the consent of the recipients and only for the purposes for which they are collected. The Company will only use the personal data of the Customers as defined in Section 4 in the manner and for the purposes set out in this Privacy Policy.
13. The Company undertakes to process the data in its possession in accordance with the provisions of the GDPR, the Infotv. and other applicable laws and this Privacy Policy and not to transfer them to third parties other than the data controllers specified in this Privacy Policy. An exception to the provisions of this clause is the use of data in aggregated statistical form, which shall not include the name of the Customer concerned or any other identifiable data in any form, and shall therefore not constitute processing or transfer of data.
14. In certain cases, in particular in response to a formal judicial or police request, legal proceedings, copyright, property or other infringements or reasonable suspicion of such infringements, or in case of prejudice to the interests of the Company, or in case of threat to the provision of its services, the Company may, unless otherwise provided by law, or with the prior express consent of the Customer, make available to third parties the Customer's accessible data.
15. The Company will do its utmost to ensure that the handling and processing of Customers' data is protected in accordance with the legislation in force, for which the Company operates a security system.

THE DURATION OF THE PROCESSING

16. The data controllers will process the personal data provided by the Customer for as long as necessary for the purposes indicated in this Privacy Policy.
17. Data controllers shall not retain personal data for longer than is reasonable. With regard to the users of the services, the controller and the Customer shall keep financial records for 8 (eight) years from the date of performance of the contract concluded between us, given that the retention of invoices and other financial records relating to purchases is 8 years under Act C of 2000.
18. In the event of unlawful or fraudulent use of personal data or in the event of a criminal offence or system attack committed by the Customer, the Data Controller is entitled to delete the data immediately upon termination of the Customer's registration, but is also entitled to retain the data for the duration of the proceedings in the event of suspected criminal offences or civil liability.
19. If the Customer does not unsubscribe from the service or does not cancel his/her registration, the data controller will process the Customer's personal data for 8 (eight) years, after which the personal data will be deleted.

DATA TRANSMISSION

20. The Company shall be entitled and obliged to transmit to the competent authorities any personal data at its disposal and stored by it in accordance with the law, which it is obliged to transmit by law or by a final and binding obligation of a public authority. The Company shall not be held liable for any such transfer and the consequences thereof.

PROTECTION OF PERSONAL DATA

21. The Company complies with its obligations under applicable data protection legislation by.
 - keeps your personal data up to date;
 - store and destroy them safely;
 - does not collect or retain excessive amounts of data;
 - protect personal data against loss, misuse, unauthorised access and disclosure and ensure that appropriate technical measures are in place to protect personal data.

22. The Company shall take appropriate technical and organisational measures to protect the Customer's personal data against accidental or unlawful destruction or accidental loss or alteration, or unauthorised disclosure or access, in particular where the processing involves, for example, the transmission of data over a network, and against all unlawful forms of processing.

Accordingly, the Company applies, among other things, different levels of access rights to the data, which ensures that only those persons with the appropriate rights have access to the data, who need to know the data in order to fulfil their obligations arising from or in connection with their work.

THE RIGHTS OF THE CUSTOMER

23. Based on the legislation on data protection, the Customer is entitled to:

- request access to your personal data,
- request the correction of your personal data,
- request the erasure of your personal data,
- request the restriction of the processing of your personal data,
- object to the processing of your personal data,
- request data portability,
- object to the processing of your personal data (including objecting to profiling; and other rights related to automated decision-making),
- withdraw its consent or lodge a complaint with the competent supervisory authority.

a)Right of access

The Customer has the right to receive feedback from the controller as to whether his or her personal data are being processed and, if such processing is ongoing, to request access to his or her personal data.

The Customer has the right to request a copy of the personal data that is the subject of the processing. For identification purposes, the controller may request additional information from the Customer or charge a reasonable fee for additional copies as an administrative charge.

b)right to rectification

The Customer has the right to request the controller to correct inaccurate personal data concerning the Customer. Depending on the purpose of the processing, the Customer shall have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

erasure ("right to be forgotten")

The customer has the right to request the controller to delete his/her personal data and the controller is obliged to delete these personal data. In this case, the controller cannot provide any further services to the Customer.

d)restriction of processing

The Customer has the right to request the restriction of the processing of his/her personal data. In this case, the controller shall indicate the personal data concerned which it may process only for certain purposes.

e)The righttoobject

The Customer has the right to object to the processing of his/her personal data, including profiling, by the controller at any time on grounds relating to his/her particular situation, or to request the controller to no longer process his/her personal data.

In addition, if the Company processes the Customer's personal data on the basis of a legitimate interest, the Customer has the right to object at any time to the processing of his/her personal data for this purpose.

In addition, the Customer is entitled to request human intervention in individual matters relating to automated decision-making. Please note that the controller does not use automated decision-making mechanisms.

f)The right to data portability

The Customer has the right to receive the personal data provided in a structured, commonly used, machine-readable format (i.e. digital format) and the right to request the transfer of such data to another controller, where such transfer is technically feasible, without the Company's hindrance.

g)withdraw consent

If the Customer's personal data is processed on the basis of his/her consent, he/she may withdraw his/her consent at any time without giving any reason by clicking on the link in the newsletters or by changing the settings of his/her website account or mobile device. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

If the Customer withdraws his consent to the Company processing his personal data, the Company may not be able to provide the requested services at all or only partially.

h)Right to lodge a complaint with a supervisory authority

If you believe that your personal data has been misused, you can also contact your local data protection authority and lodge a complaint, in particular in the Member State where you have your habitual residence, place of work or place of the alleged breach.

In Hungary, you can also contact the National Authority for Data Protection and Freedom of Information: 1055 Budapest, Falk Miksa utca 9-11. phone: +36-1 391-1400; fax: +36-1 391-1410; e-mail: ugyfelszolgalat@naih.hu).

TAGS

24. In the course of its activities, the Data Controller may use the services of various external service providers (data processors) to process your personal data for specific purposes in order to provide the Service.
25. Processors may process your personal data for no longer than the period for which the data processing contract with them is valid and in force or for which they are required to retain your data under applicable data retention laws.
26. We may disclose your personal data to the following data processors for the following purposes:

NAME OF DATA PROCESSOR	PURPOSE OF THE DATA PROCESSOR
Álomvilág Ltd. 7761 Kozármisleny, Pinty utca 12. Tax number: 13195869-2-02	WordPress administrator service
Stripe, Inc. 354 Oyster Point Blvd South San Francisco, CA 94080 United States	credit card payment service provider
Closte, LLC 1603 Capitol Ave. Suite 310 A546 Cheyenne, Wyoming 82001	web hosting provider
Viva Payment Services Single Member S.A. Hungary Branch 1037 Budapest, Seregély utca 3-5. Tax number: 27919750241	credit card payment service provider
ActiveCampaign, LLC	newsletter sending service provider

1 North Dearborn Street 5th Floor Chicago, IL 60602	
Intercom, Inc., 55 2nd Street, 4th Fl., San Francisco, CA 94105, USA	helpdesk software
GoDaddy 2155 E. GoDaddy Way Tempe, AZ 85284 USA	domain registrar and service provider
Paylike ApS P.O. Pedersens Vej 14 Skejby, 8200 Aarhus N Denmark	Paylike acts as a data controller in relation to information about the payment instrument, for more information about processing please read their privacy policy.

27. The data processing of these third party controllers is subject to their own privacy policies, so please read their privacy policies for more information.

CONTACT

28. If the Customer wishes to exercise his/her rights in relation to data protection issues or to lodge a complaint, he/she may contact the Company's designated staff member by sending a letter to the e-mail address given below. You may also contact the Company and the Chamber by post to the addresses below.

On behalf of the Company:

E-mail: info@brazeit.hu

Postal address: 1137 Budapest, Jászai Mari tér 5-6.

OTHER PROVISIONS

29. The controller reserves the right to amend this Privacy Policy at any time by unilateral decision. You may obtain information about such amendments on the Website operated by the Company.

- 30.** The data controller regularly checks its online platforms and the information published on them and makes every effort to ensure that the information is up-to-date and accurate. Nevertheless, you may find information on the online platforms that is no longer up to date. The Company accepts no financial responsibility for such information.
- 31.** Visitors to online interfaces and Customers may also visit other websites not operated by the Company from the Company's online interfaces. The Company is not responsible for the accuracy of the information provided there, the content of the websites or the security of the data provided by visitors to the online areas and Customers on the Company's online interfaces. Therefore, when using these websites, please check the privacy policy of the company concerned.
- 32.** This Privacy Policy is governed by Hungarian law.
- 33.** If the law in force in your country imposes more stringent rules on the parties than those set out in this Privacy Policy, you must comply with them. However, you acknowledge and agree that the Controller's liability is based on the law applicable to this Privacy Policy and excludes its liability to the fullest extent possible under applicable law and court decisions for non-compliance with the provisions of the Customer's country.
- 34.** If you have any questions that are not clearly answered in this Privacy Policy, please send an e-mail to info@brazeit.hu.