



DATA MANAGEMENT POLICY

Lépéselőny Média Kft. (Hereafter referred to as the Service Provider) hereby informs users of the Services available on its website about the personal data it manages, practices regarding the handling of personal data, and the ways and means of exercising the rights of those concerned.

By using the Service available on the Website, the User accepts the contents of this Privacy Policy by providing personal information and expressly agrees to the data handling contained in this Policy which is not based on a statutory mandate but on a voluntary basis.

1. Name, address and electronic contact details of the data controller:

- 1.1. Name: Lépéselőny Média Kft
- 1.2. Address: 1221 Budapest, Kapisztrán u. 7.
- 1.3. Electronic availability: lepeselony@lepeselony.hu
- 2.1. Data Management Registration Number: NAIH-108726/2016.
- 2.2. Data Management Registration ID: 02034-0001.

3. Data Manager

- 3.1. Name: Lépéselőny Média Kft. - Zoltán Németh
- 3.2. Contact: 06-1-6-333-608
- 3.3 Name of the Data Protection Office bearer: Zoltán Németh
- 3.4. Data Protection Office bearer Contact: (postal address, e-mail address, telephone) 1221 Budapest, Kapisztrán u. 7. / lepeselony@lepeselony.hu / 06-1-6-333-608

Host provider for Lepaselony Media Ltd.:
Name: MediaCenter Hungary Kft.

Address: 6000 Kecskemét, Sosztakovics u. 3. II/6

Postal address: 6001 Kecskemét, Pf. 588.

E-mail: mediacenter@mediacenter.hu

Telefon: 06 76 / 575-023

Fax: 06 76 / 575-024

Website: www.mediacenter.hu



4. Name of data management

Data management based by volunteer, informed, and determined consent of users registered on the web site.

5. Legal basis for data handling

Act CXII of 2011 on the right to information self-determination and freedom of information (1) (a) of the Act on the Protection of Human Rights and Fundamental Freedoms (hereinafter: "Infotv.").

6. Scope of managed data

6.1. Data compulsorily provided by the User during registration.: surname, first name, company name, position, postal code, city, address, telephone, e-mail address, fields of activity, revenue category, headcount, identity, password,

6.2. User defined data

Data provided by User's decision.: Country, Fax Number, Skype, Keyword, Email Address, Mobile Number, Enhanced Presentation, Attachments (Image, Video, Any Uploaded File) and Use of the Meeting Room, as well as Message Boards and Useful Data provided in the Ads box and any other information provided by the User on their own, unilateral decision.

6.3. Other data to be recorded by the Service Provider: The IP address of the user's computer, computer settings, start and end time of the visit (all users have access to the last visit date), the http address of the possible sender reference.

6.4. The Service Provider excludes all liability for the authenticity of the data or for the completeness of the data fields, given that it does not have the data sources (data is provided by our partners during registration and then by phone update). All fees of the Service Provider have been determined with respect to the above limitations.

7. Purpose of data management

7.1. For User's compulsory given data: Identifying the user's authority, Prevention of Abuse, Assisting the Service Provider and promoting the provision of the Service, Market Research, Direct Marketing Activity and Business Acquisition for Own Purpose or Third Party Defined, the transfer of the "Terms of Use" (database sales).

7.2. For data provided by User's decision: creation of an internal Internet community, identification of users. The information provided will allow Users to find and identify each other more easily. Data may be used by the Service Provider to display personalized ads on banner ads appearing on the downloaded pages when visiting the site. The User may, for any reason, prohibit the use of such data for any purpose without the need of reasoning, by sending an e-mail / opt-out to the Service Provider.

7.3. For other data recorded by the Service Provider, the data is stored in an anonymous manner and serves for statistical purposes.

7.4. The data controller will not use any personal information for purposes other than those specified in and referred to in section 7.1., and personal data may be transferred to third parties only by the



prior and informed consent of the User, protected by appropriate encryption. This does not apply to any statutory transfer of data. The Service Provider transmits the User's personal data only to the extent that the User is using the Service from abroad. The Service Provider informs the User that the data disclosed in the Service will also be available to foreign users.

7.5. Voice recording for a telephone conversation can only be made based on the prior consent of the User. The Service Provider keeps the recording up to the time defined by law and, upon request, makes it available to the User free of charge. Personal data provided to the Service Provider during voice recording and telephone conversation can only be managed and forwarded to a third party on the basis of the User's consent. In the case of data transmission, the Service Provider shall inform the User of the third party's name and contact details to obtain further information about the data handling, possibly the fact that it is being processed by the data processor and the remedies available. For remedies related to voice recording and data transmission, Articles 9-11. points are appropriate.

8. Duration of data management

8.1. In the case of User's compulsory given data, until the Agreement regulating the use of the Services with the User ceases or while the User is a member of the community.

8.2. In the case of data provided by the User's decision, as long as the User displays them on the hosting provided by the Provider, or in the case of personalized advertisements, while the User does not live by the Provider's forbidden / unsubscribe option.

8.3. For other data recorded by the Service Provider, the data will be stored for 8 days after the visit, except for the last visit. The time of the last visit will be automatically overwritten at User's next visit.

8.4. After the expiration of the periods specified above, the Service Provider may use the data anonymously to make operational and internal business statistics.

8.5. To assist in solving disputes arising out of and in such disputes, or in order to substantiate their own claim for damages to the User, the Beneficiary shall have the right to use the User's data to the extent necessary if the dispute or claim for damages occurred prior to the date of cancellation of the data.

9. Information about the User's data management, deletion and correction of data

9.1. For the purposes of data handling, the User shall be entitled to the following rights:

- the right to request information
- right of rectification
- the right to submit a request for cancellation
- protest against data handling
- the right to data transferring
- right to withdraw consent
- the right to legal remedy



The following rights may, in exceptional cases, be restricted by law, in particular to protect the rights of the data subject or others.

9.2. Deletion

The treated data must be deleted if:

- (a) the handling of the data is unlawful;
- (b) the user requests it, except for statutory mandatory data processing;
- (c) the data is incomplete or incorrect, and this status can not be legally remedied, provided that the deletion is not excluded by law;
- (d) the purpose of data management has ceased or the statutory deadline for data storage has expired;
- (e) has been ordered by the court or the Authority.

The User is entitled to request personal data deletion. The Service Provider informs the User of the cancellation or of the rejection of the cancellation request.

9.3. Right to request information

The User may request information on the personal data handled by the Service Provider and their source, the purpose, legal basis, duration of the data handling, the name, address and data management of the Service Provider as data controller or data processor, the right to complain, the privacy incident and the circumstances, its effects and the measures taken to remedy it, as well as whether the data subject is required to provide the personal data and the possible consequences of the failure to provide the data, the possibility of withdrawing the consent and, in the case of the transfer of his personal data, the legal basis and the addressee of the transfer.

The request for information is only personally met by the Service Provider, for the security of User data. For this purpose, the request for information may be sent to the Service Provider in the form of a private document with full probative force, or by email or fax, with the appropriate identification information (user ID, password, name, company name, address, address, e-mail address) sent. The Service Provider shall provide the information in writing, in the shortest possible time, but not later than 15 days, to the address / e-mail address provided by the person concerned. These informations is free of charge.

9.4. Rectification

If the User indicates to the Service Provider that the treated personal data does not correspond to the reality or the Service Provider otherwise knows the personal data and the correct data, then the Personal Data will be corrected promptly by the Service Provider. The Service Provider will notify the User about the refusal of the request for rectification or correction.

9.5. If the provision of information is restricted by law, the Service Provider may refuse the requested information and inform the User of the reasons for refusing the information.

9.6. Refusing to cooperate with direct marketing

The user may refuse to cooperate directly with the so-called Direct Marketing Letters for direct business acquisition without any justification. In this context, it is entitled to deny or prohibit the inclusion of its name data in the contact list or the business listing list, the direct use of the business as well as the use thereof for specific purposes and the transfer to a third party.



The right to data transferring

The User is entitled to receive the personal information provided to him/her by the Service Provider in a machine-readable, widely used form and also have the right to transmit this data to another Data Manager without being obstructed by the Provider who provided the personal information about you.

The User is entitled to receive the personal information provided to him/her by the Service Provider in a machine-readable, widely used form and also have the right to transmit this data to another Data Manager without being obstructed by the Service Provider for which the Personal Data was made available about you, if:

- (a) the data management is based on a contribution or contractusl, and
- (b) data management is carried out in an automated manner.

In exercising the right to carry the data, the User is entitled to request the direct transfer of personal data between data controllers, if technically feasible.

Right to withdraw consent

Your consent to the processing of the data may be revoked by filling in, signing, and returning the Service to the Service Provider, which can be found on the Service Provider's website or directly from the Provider's form. After receipt of the declaration of withdrawal of the consent by the Service Provider, the processing of data will be terminated without delay and the data will be deleted from its register if there is no legal impediment. Service Provider notifies User in mail sent to address given by User regarding cessation if data handling, deleting User's data, or any barrier against it.

10. Protest

The User may object to the handling of his or her personal data if:

- (a) data processing is necessary for the performance of a task in the public interest or in the exercise of a public authority exercised on the Service Provider;
- b) data processing is necessary for the validity of the Service Provider's or a third party's legitimate interests, unless the interests or fundamental rights and freedoms of the User that require the protection of personal data, especially if it concerns a child, are the priority of those interests.
- c) the processing of personal data is only necessary for the enforcement of the right or legitimate interest of the Service Provider or the data exporter, unless data management is prescribed by law;
- (d) the use or transmission of personal data is carried out for the purpose of polling, scientific research or direct business acquisition;
- e) the right of protest is permitted by law.

The User may not legitimately object to data handling if the Service Provider proves that data management is justified by legitimate compelling reasons that prevail over the interests, rights and freedoms of the User, or are related to the submission, validation, or protection of legal claims.

If your personal data is handled for direct business acquisition, the User is entitled to object at any time to the handling of personal data relating to this purpose, including profiling, if it is related to direct business acquisition. If the User objects to personal data for direct business acquisition, personal data may not be processed for that purpose.



The Service Provider shall examine the protest within the shortest time, but not later than 15 days after the submission of the request, to make a decision on its validity and shall inform the User in writing.

If the protest is well founded, the Service Provider will discontinue data processing, including further data collection and data transfer. The Service Provider notifies all those who have been previously transferred to the personal data relating to the protest and who are obliged to take action in order to enforce the right to protest.

11. **Law enforcement opportunities**

If the Service Provider fails to take action upon the request of the User, it shall inform the data subject without delay and no later than one month from the receipt of the request for the reasons for the failure to act and to submit the complaint concerned to a supervisory authority and exercise its right of judicial redress.

Info.tv. the User may turn against the Service Provider in case of violation of his rights and in the cases specified in Info.tv. The court proceeds out of court.

With the notification of the National Privacy and Data Protection Authority (hereinafter: the Authority), any person may initiate an investigation on the grounds that there has been a violation of the rights in connection with the processing of personal data or the disclosure of data of public interest or public interest in the public interest.

The investigation of the Authority may be initiated within one year from notification of the rejection of the claim, the expiration of the deadline and the expiry of the deadline for paying the reimbursement fee.

Availability of the National Data Protection and Information Authority:

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22 / C.

Postal address: 1530 Budapest, Pf. 5.

Website: <http://www.naih.hu>

Phone: 06-1 / 391-1400

Fax: 06-1 / 391-1410

E-mail: ugyfelszolgalat@naih.hu

12. **Possibility of modifying the data management policy**

The Service Provider reserves the right to unilaterally modify this Privacy Policy with prior notice to users. The User accepts the amended Privacy Policy after the amendment enters into force.

13. **Data Processing Rules**

The Service Provider is considered to be a data processor for contracts affecting data management with its clients as data controllers.

The Data Processor provides adequate safeguards to comply with the requirements of EU Regulation 2016/679 and to implement appropriate technical and organizational measures to ensure the rights



of the data subject. The Data Processor is obliged to ensure the security of the data, and must also take the technical and organizational measures and develop the procedural rules necessary to enforce the law and other data and confidentiality rules.

The Data Processor may not use any data processor without the prior written permission of the Data Controller, or the data processor may use additional data processor as provided by the Data Controller. In the case of a general written authorization, the Data Processor informs the Data Controller of any intended changes that involve the use or replacement of additional processors, thereby enabling the Data Controller to raise objections to these changes.

The data processor may not make any substantive decision concerning data management, process personal data that he or she is aware of, only in accordance with the provisions of the Data Handler, for processing his own personal data, and keep personal data in accordance with the provisions of the Data Handler.

The contract for the processing of data shall be in writing.

The Data Processor:

- handles personal data only on the written instructions of the Data Handler,
- ensure that persons authorized to handle personal data undertake a confidentiality obligation or are subject to a legally binding obligation of confidentiality,
- upon termination of the provision of the Data Management Service, the Data Manager will delete or return any personal data to the Data Controller and delete any existing copies unless the Union or the Member States' right to provide personal data is required;
- Provides to the Data Controller all information necessary to verify the fulfillment of the obligations set forth in the relevant legal provisions and which permits and facilitates audits by the Data Controller or by other auditor, including on-the-spot audits.

In contrast to the data subject, the Data Controller is liable for any damage caused by the Data Processor and the Data Handler is obliged to pay to the data subject the personal injury violation caused by the Data Processing Processor. The Data Controller shall be exempt from liability for damages and damages if it proves that the damage or damage to the person's personality right is caused by an unavoidable cause outside the scope of the data processing. The data processor shall only be liable for any damage caused by data processing if he or she fails to comply with the obligations imposed on the data processor set out in EU Regulation 2016/679 or has disregarded or contradicted the legitimate instructions of the data controller. The data controller or the data processor shall be exempt from liability under EU Regulation 2016/679 if he or she proves that he or she is not responsible for any incidental event.