

Papageno Consulting Ltd. - PRIVACY POLICY

I. INTRODUCTION

Papageno Consulting Ltd. (hereinafter referred to as „Company”) is committed to protecting personal data of its clients, partners and users with special regard to respecting the right of informational self-determination of them. The Company manages personal data as confidential information and takes all safety, technical and organizing measures to ensure the protection of data.

This document on privacy policy sets out the following:

- The type of your personal data we collect and process in the course of partnership or client relationship related to our website, newsletter and online services;
- Where we gain such data from
- What we use such data for
- How we store such data
- Whom we forward such data to/ provide access to such data
- How we observe your data protection rights
- How we comply with data protection provisions.

The privacy policy principles are in line with effective data protection regulations, thus especially with the following: ♦ Act CXII of 2011 on the Right of Informational SelfDetermination and on Freedom of Information (hereinafter referred to as Privacy Act); ♦ 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, GDPR); ♦ Act V of 2013 on the Civil Code (Civil Code); ♦ Act C of 2000 on Accounting (Accounting Act); ♦ Act CXXXVI of 2007 on the Prevention and Combating of Money Laundering and Terrorist Financing (PCMLTF);

II. DATA PROCESSOR

Name: Papageno Consulting Ltd
Headquarters: 1118 Budapest, Somlói út 33a
Company registry number: 01 09 987293
Court of registry: Fővárosi Törvényszék Cégbírósága
Tax number: 23974654-2-43
Email: info@papageno.hu
Website: papageno.hu

Data privacy officer

We have appointed a data privacy officer („DPO”) to supervise the compliance with this privacy policy. Should you have any questions regarding this policy, the management of your personal data or you wish to practice your data protection rights related to their access, rectification, restriction or erasure, please contact the data privacy officer here: david.zsoldos@papageno.hu

III. WHAT TYPE OF PERSONAL DATA DO WE COLLECT?

Data management by the Company is based on voluntary consent, general business interest and client relationship of the parties involved, the legitimate interest of conducting business activities and on relevant legislation. In case of data management subject to voluntary consent you are entitled to revoke your consent at any stage of data management and you are entitled to practice your right related to the access, rectification, restriction and erasure of your data.

In certain cases, the management, storage and forwarding of particular types of submitted data are obligatory in accordance with relevant regulations. In such cases we inform our clients/audience about this obligation.

Any information suitable for identifying you, e.g. your name, contact info, age, etc. and information related to the usage of our website by which you are directly or indirectly identifiable, constitute personal data. We may collect personal data when you browse our website, participate in our prize game, sign up for our newsletter, shop via our webshop or contact us, etc.

We collect personal data, particularly the following type:

- First name
- Surname
- Email address
- Information related to browsing our website;
- Any form of communication with or addressed to us, in letter, email, by phone, or via social media.
- Your location based on the real time IP address of your computer or device, when using
- Location based services and allow this function on your computer or device.

IV. WHY, HOW LONG AND WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?

Personal data is primarily used for direct marketing purposes for general business and client relationship based on legitimate interest or user consent. No further notification is provided to you, all issues related to privacy policy are defined in this document. You have the right to decline the management of your data for general business or client relationship. In this case, your data will no longer be processed for such purposes.

If your data is collected for purposes other than general business or client relationship, we notify you about the relevant regulatory provisions and request your preliminary written consent.

We may use your personal data for the following purposes:

- contacting, managing customer complaints, newsletters, promotions, orders,
- performing webshop purchases, maintaining an inventory of clients in the course of such
- purposes, differentiating between clients, contacting clients, summarizing customer purchases, conducting webshop orders, issuing invoices of purchases, completing orders, documenting purchases and payments, fulfilling accounting obligations.
- Administrative and legal purposes: your data is used for statistical and marketing analyses, remarketing/marketing purposes, system testing, customer satisfaction surveys, maintenance and development purposes as well as for litigating disputed issues or legal claims. Please note that based on your data we may do profiling for statistical and marketing analyses. For profiling we will need your preliminary consent and we seek to use the data adequately. By submitting any personal data, you expressly agree that we may use them for profiling purposes in accordance with this privacy policy;
- Security and administrative measures, health protection, prevention/detection of crime: in
- compliance with our legal obligation we are entitled to provide personal data to authorities and law enforcement agencies;
- Customer service communication: we use your data to keep in touch with you, our clients, and to improve our services and your user/buyer experience;
- Marketing: from time to time we will send you marketing materials electronically about products, prize games, promotions, if you agreed to receive such materials. In this case you can indicate whether you wish to subscribe or unsubscribe from such emails. In addition, in all forms of electronic communication you may indicate that you do not want to receive direct marketing materials from us anymore.

We process your personal data only for those purposes and cases in which we have the legal basis to do so. The legal basis depends on the purpose of collecting and processing personal data.

We may process your personal data for the following reasons, as well:

- ◆ You agreed to the processing of your personal data (e.g. for marketing purposes);
- ◆ To protect your or another person's fundamental interests (e.g. in case of emergency)

Children of minimum 16 years of age may give their personal consent. For minors below this age, parents or legal guardians shall provide consent. We retain your data until the consent is withdrawn or the statutory deadline expires. We do not retain your data after the purpose of processing is achieved. When determining the appropriate retaining time, we take into account the quantity, nature and sensitivity of personal data and the purpose of processing them and we consider whether these purposes may be achieved by other means.

V. DISCLOSING YOUR PERSONAL DATA

In order to comply with data protection purposes we may disclose your data to other enterprises belonging to the company group within the European Union in order to process data obtained through our website and/or to operate, maintain or manage our website, its services and content in accordance with this privacy policy. We do not disclose your personal data to third countries or international organizations outside the European Union, within or outside the company group either.

We will notify you before disclosing your personal data to any service provider located outside the European Economic Area. When using external companies or professionals for processing those personal data which were not provided by you, these companies or professionals are entitled to process such data exclusively in the course of performing the particular task, ensuring compliance with this privacy policy.

VI. CONTACTING

You can contact data processor via the contact information indicated in this document and on the website. The Company deletes all received emails with the name and email address of the sender, the date, time and any other personal data contained in the email after maximum five years.

VII. OTHER DATA MANAGEMENT

On other data management not included here, we inform the data subject when submitting such data. Please note that required by the court, prosecutor's office, investigating authority, offence authority, administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information, the Central Bank of Hungary and relevant regulations data processors may be required to provide access to personal data.

If the authority indicated the exact purpose and type of required data, the Company may disclose such data only to the extent that is absolutely necessary for the purpose of the request.

VIII. YOUR PRIVACY RIGHTS, LEGAL REMEDIES

You may request information on the use of their personal data, furthermore may request correction and, with the exception of compulsory data processing, erasure or revocation of such, may exercise your right to recording and to object as indicated at the time of data recording as well as via the contacts of data processor specified above.

Right to be informed:

Our Company takes the appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under GDPR Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The information shall be provided in writing via the contacts specified in section II. When requested, the information may be provided to you orally, provided that your identity is proven by other means.

Right of access your data:

You have the right to obtain confirmation from data processor as to whether or not your personal data are being processed, and, where that is the case, access to the personal data and the following information: purposes of the processing; the categories of personal data concerned; 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; the envisaged period for which the personal data will be stored; the right to request rectification or erasure or restriction of processing of personal data; the right to lodge a complaint with a supervisory authority; any available information as to the source of data; the existence of automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing. Where personal data are transmitted to a third country or to an international organization, you have the right to be informed about the appropriate safeguards relating to the transmitting. The Company shall provide you a copy of the personal data undergoing processing. For any further copies requested by you, data processor may charge a reasonable fee based on administrative costs. The Company shall provide information to data subject by electronic means. Information shall be provided within a maximum of one month from the request.

Right to rectification:

You may request from the Company to rectify or complete the processed personal data.

Right to erasure:

You have the right to obtain from the Company the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdrew consent on which the processing is based and where there is no other legal ground for the processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law;
- the personal data have been collected in relation to the offer of information society services.

The previous (erased) data can no longer be recovered after the request for erasure or modification has been completed. Erasure of the data cannot be requested if the processing is necessary for either of the following reasons: for compliance with a legal obligation which requires processing by Union or Member State law, if the data processing is necessary for the establishment, exercise or defense of legal claims of the Company, if the data processing is necessary for the submission, enforcement and protection of legal claims; the data processing is necessary due to significant public interest based on Union or Member State law, if the data processing is necessary due to public interest concerning the field of public health; and or for archival purposes of public interest, for scientific or historical research purposes or for statistical purposes.

Right to restriction of processing:

You are entitled to request the Company to restrict processing where one of the following applies:

- you contest the accuracy of the personal data, for a period necessary to verify the accuracy of the personal data;
- the processing is unlawful and you object to the erasure of the personal data and request the restriction of their use instead;
- data processor 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; or
- you objected to processing; in this case restriction shall apply for a period enabling the verification whether the legitimate grounds of data processor override those of the data subject.
- where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.
- The Company informed you before the restriction of processing is lifted.

Right to data portability:

You have the right to receive the personal data concerning you, which you provided to data processor, in a structured, commonly used and machine-readable format and have the right to transmit those data to another processor.

Right to object:

You are entitled to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, including profiling based on those provisions. Data processor shall no longer process the personal data unless data processor 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. Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Automated individual decision-making, including profiling:

You are entitled not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. The above right shall not apply if data processing

- is necessary for entering into, or performance of, a contract between you and data processor;
- is authorized by Union or Member State law to which data processor is subject and which also lays
- down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on your explicit consent.

Right to withdrawal:

You are entitled to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Procedural rules:

Data processor shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Data processor shall inform you about any such extension within one month of receipt of the request, together with the reasons for the delay. If you submit the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested.

If data processor does not take action on your request, data processor shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Company shall provide the requested information and any communication free of charge. Where your request is manifestly unfounded or excessive, in particular because of its repetitive character, data processor may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on the request. Data processor shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Data processor shall inform the data subject about those recipients if the data subject requests it.

Data processor shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, data processor may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Complaint to the data privacy officer:

For any issues concerning the privacy measures of the Company please refer to our privacy officer.

Right to court:

In case of infringement of data subject's rights, the data subject may bring these to the attention of the court. The court shall hear the case without delay.

Data protection authority procedures:

Complaints may be made to the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

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

Postal address: 1530 Budapest, Pf.: 5.

Phone: 06.1.391.1400

Fax: 06.1.391.1410

Email: ugyfelszolgalat@naih.hu

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

IX. MODIFICATIONS TO THE PRIVACY POLICY

This privacy policy may be modified/amended from time to time. We will announce any changes to the privacy policy on our website or we will notify you via email.