

DATA PROTECTION INFORMATION

data management practices in connection with the use of this website

COMPANY:	ArgonSoft Information Technology Services Limited Liability Company
HEADQUARTER:	1133 Budapest, Váci út 76. tower 1. Door 7-8.
TAX IDENTIFIER:	14168332-2-41
COMPANY REGISTRATION NUMBER:	01-09-891978
REPRESENTATIVE:	Adorján Zsolt Kázmér Managing Director
WEBPAGE:	https://www.argonsoft.hu/ https://www.asis.to
	(from now on referred to as "the Company")

Please be informed that our Company processes personal data in compliance with the applicable laws, in particular, Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (from now on: Infotv.) and Regulation (EU) 2016/679 of the European Parliament and the Council of the European Union (from now on: Regulation).

Our company handles personal data confidentially and takes all technical and organizational measures related to data storage and management and other technical and organizational measures to ensure secure data management.

This notice informs you of the policy regarding the processing of your personal data when you visit our website.

Our website is built using the HTTPS protocol. Data sent using HTTPS is protected by the Transport Layer Security (TLS) protocol, which provides three key layers of protection:

- Encryption: encrypts the transmitted data to keep it safe from eavesdroppers. This means that when browsing websites, no one can "access" a user's communications, follow them across multiple pages, or obtain their data.
- Data integrity: data cannot be altered or contaminated in transit - whether intentionally or carelessly - without the system detecting it.

- Authentication: proves that users are communicating with the correct website. Provides protection against an intrusion attack.

We are committed to protecting the security of the information we collect about you. We take reasonable measures, including administrative, technical, and physical procedures, to protect your information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. When you log in to your account, all Internet communications are protected by Secure Socket Layer (SSL) technology, which provides a high level of security using 128-bit encryption.

I. INFORMATION PROVIDED TO THE DATA CONTROLLER IN CONNECTION WITH THE USE OF THE WEBSITE, INFORMATION PROVIDED TO THE DATA CONTROLLER IN CONNECTION WITH THE VISIT TO THE WEBSITE, ITS USE, DATA PROCESSING ACTIVITIES

If the user does not explicitly provide any personal data or information on the website, the Data Controller shall not collect or process any personal data relating to the user in a way that would allow the user to be personally identified.

By visiting the Website and clicking on the "Accept" button, each user consents to the Data Controller recording the data and information described in this section and to the placement of cookies necessary for the recording.

Such data are the data of the user's computer that are generated during the use of the Website and that are recorded by the Data Controller's system as an automatic result of technical processes. The automatically recorded data are automatically logged by the system when the user visits or exits the Website, without any specific declaration or action on the part of the user.

This data is not linked to other personal user data, i.e., the user cannot be identified based on this data. Such data is only accessible by the Data Controller and its data processor (hosting provider). This data may be collected using various technologies, such as cookies, web beacons, and log files.

Such data include the following information:

Cookies: Cookies are small files that are stored on your computer, smartphone, tablet, etc., by the websites you visit. Their use ensures that the service provider can display the content of the website with the content the user expects (to ensure user experience), and to make the user's browsing more efficient, and to facilitate the display of content that is relevant to the user's interests or is also necessary for the use (playback) of language settings, audio, and video files, etc.

Cookies have numerous functions and different lifespans, and there are many different types. Cookies are short text files that the Website sends to the user's computer hard drive and contain information about the user. To provide a personalized service, the Data Controller places a small data package, known as a cookie, on the user's computer and reads it back during a subsequent visit.

The role of cookies:

- collect information about visitors;
- remember visitors' individual preferences, e.g., when using online transactions, so they don't have to re-enter them;

- makes the website more accessible to use;
- provide a quality user experience.

Types of cookies:

- strictly necessary session cookies: these cookies are used to allow visitors to browse the website of the Data Controller and use its functions and services fully and smoothly. These types of cookies are valid until the end of the browsing session and are automatically deleted from the computer or other browsing device when the browser is closed.
- third-party cookies (analytics): the Data Controller uses Google Analytics as a third-party cookie on its website to provide a statistical service. By using these cookies, the Data Controller collects information about how visitors use the websites. This data is used to improve the website and the user experience. These types of cookies also remain on the visitor's computer or other browsing device (e.g. mobile phone) until they expire, until the visitor deletes them.

According to Article 155 (4) of Act C of 2003 on Electronic Communications (Ehtv.), data may be stored on the electronic communications terminal equipment of a subscriber or user or access to data stored there may be granted only based on the clear and complete consent of the user or subscriber concerned, including the purpose of the data processing.

Option to turn off cookies

If you do not want the Data Controller to collect the above information about you in connection with your use of the Website, you can turn off the use of cookies in your internet browser settings, in whole or in part, or you can turn off cookies by clicking the "I reject" button on the Data Controller's website. You can delete all cookies stored on your computer and turn off their installation in most browser programs. In this case, however, you may have to manually set specific preferences each time you visit a particular page.

If you do not wish to allow cookies, the Data Controller will not place cookies on your device. However, restricting the use of cookies means that the content of the website will not be available in the content and format you want to see but in a "restricted mode" and that certain functions will not be available at all or only partially.

Log files: the Internet browser automatically transmits specific other data to the website, such as the IP address of the user's computer (e.g., 110.256.55.01), the type of operating system or browser program used by the user, the domain name from which the user visited the website, the sub-pages visited by the user within the website, the content viewed on the website.

The Controller, like other Internet service providers, analyses this data to determine which areas of the Website are more popular than others. Furthermore, like other major service providers, the Data Controller also uses this data to tailor the website experience to the user's needs.

How do we use this information?

The data collected by the above-mentioned technologies cannot be used to identify the user, nor can the Data Controller link this data to any other potentially identifiable data.

The primary purpose of the use of such data is to enable the Data Controller to operate the Website properly, in particular, to monitor the data relating to visits to the Website and to detect possible abuse of the Website.

In addition to the above, the Data Controller may use this information to analyze usage trends and to, improve and develop the functionality of the Website, and obtain aggregate traffic data on the overall usage of the Website.

The Data Controller may use the information obtained in this way to compile and analyze statistics on the use of the Website and to transmit to third parties or make public in aggregate and anonymously aggregated statistical data (e.g., number of visitors or registrants, most popular topics or content) that are not suitable for such identification.

No **automated decision making or profiling takes** place during the processing.

II. PROCESSING OF BUSINESS PARTNERS' CONTACT PERSONAL DATA

In the course of its day-to-day operations, our company does business with other economic operators. In the course of cooperation with business partners, the natural persons involved in the performance of the contract must maintain contact with each other as representatives and contact persons of each business partner.

Legal basis for processing: processing is necessary for the performance of the Company's contractual relations (Article 6(1)(b), (c) GDPR).

The data subjects are: all natural persons employed by the Company's business partners, for whom, and to whom, the data subject is a contact person.

Data processed: name, e-mail address, telephone number, address (typically for self-employed persons).

Purpose of data processing: to conclude a contract with the Company's business partner, to maintain business relations, and to ensure the continuity of product flow, service, and the necessary contact.

Duration of data processing: 5 years after the termination of the business relationship or the termination of the data subject's capacity as a representative unless a more extended period is provided for by law.

The consequence of not providing the data is failure to do business.

III. YOUR RIGHTS WITH DATA PROCESSING

1. Right to information

You have the right to be informed about the processing of your data, which the Company will do by providing you with this notice. Further information may be requested by e-mail to info@argonsoft.hu and by post to 1133 Budapest, Váci út 76. The Data Controller shall reply in writing within 25 days of receipt of the request at the latest.

2. Right of access

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and all information relating to the processing.

For example the purposes of the processing, the categories of personal data concerned, to whom the personal data have been or will be disclosed, the envisaged period of storage of the personal data, the fact of automated decision-making, including profiling, you may request the controller to rectify, erase or restrict the processing of personal data concerning you, and object to the processing of such personal data. The data subject shall have the right to lodge a complaint with a supervisory authority.

3. Right to rectification of personal data

You have the right at any time to have inaccurate personal data about you corrected at your request without undue delay. Taking into account the purpose of the processing, you also have the right to request that incomplete personal data be completed, including by means of a supplementary declaration.

Please report any changes to your personal data to our Company as soon as possible to facilitate lawful processing and the exercise of your rights.

4. Right to erasure and right to be forgotten

You have the right to request that our Company delete personal data concerning you without undue delay if one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) in the case of processing based on consent, you withdraw your consent on which the processing is based, and there is no other legal basis for the processing;
- c) you object to the processing, and there is no overriding legitimate ground for the processing, or you object to the processing for direct marketing purposes;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to our Company;
- f) the personal data have been collected in connection with the provision of information society services.

Our Company will not comply with your request for erasure if further processing is necessary for one of the following reasons: (

- a) for the exercise of the right to freedom of expression and information; (
- b) for compliance with an obligation under Union or Member State law or for the performance of a task carried out in the public interest which requires the processing of personal data; (
- c) on grounds of public interest in the field of public health; (
- d) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, where deletion would be likely to make such processing impossible or seriously impair it; or (
- e) for the establishment, exercise, or defense of legal claims.

The deletion of data is permanent and irreversible.

5. Right to block or restrict processing

You have the right to request the Company to restrict the processing of your personal data if one of the following conditions is met:

- a) you contest the accuracy of the personal data; in this case, the restriction applies for the period of time that allows us to verify the accuracy of the personal data;
- b) the processing is unlawful, and you oppose the erasure of the data and instead request the restriction of their use;
- c) Our company no longer needs the personal data for the purposes of processing, but you request it for the establishment, exercise, or defence of legal claims; or
- d) you have objected to the processing, in which case the restriction applies for a period of time until it is determined whether our Company's legitimate grounds prevail over the data subject's legitimate grounds.

If the processing is restricted, such personal data, with the exception of storage, may only be

- (a) with your consent; (
- b) for the establishment, exercise, or defence of legal claims; (
- c) to protect the rights of another natural or legal person; or (
- d) for important public interests of the Union or of a Member State.

6. Right to object

You can object to data processing in the following cases:

- in the public interest or in the exercise of a task carried out in the exercise of official authority vested in the controller
or
- in the case of processing based on legitimate interests, where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning them for such purposes, including profiling where it is related to direct marketing.

In the event of an objection, the controller may no longer process the personal data unless there are compelling legitimate grounds for doing so that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.

The head of the department responsible for processing the personal data shall suspend the processing for the duration of the examination of the objection of the data subject to the processing of his or her personal data, but for a maximum of 5 days, examine the grounds for the complaint and take a decision, which shall be communicated to the applicant.

The right to object cannot be exercised if the decision.

- is permitted by Union or national law applicable to the controller, which also lays down appropriate measures to protect the rights or freedoms and legitimate interests of the data subject;
- processing is necessary for the conclusion or performance of a contract;
- is based on the explicit consent of the data subject.

7. Right to data portability

You have the right to receive the personal data concerning you that you have provided to the Company in a structured, commonly used, machine-readable format and the right to request the transfer of such data to

another controller. You, therefore, have the right to request that the Company send your personal data directly to another controller.

IV. PROCEDURES FOR ENFORCING YOUR RIGHTS

The Data Controller shall provide the information in accordance with the request for information, without delay, but within a maximum of 25 days, in writing, in an intelligible form, and at the request of the data subject.

In the event of an objection, the data controller shall examine the grounds for the objection within the shortest possible time from the date of the request, but not later than 15 days, and shall decide whether the objection is justified and inform the applicant in writing of its decision.

In the event of correction, blocking, marking, or deletion of data, the controller must notify the person concerned. The notification may be waived if this does not prejudice the legitimate interests of the data subject with regard to the purposes of the processing.

If the Data Controller refuses a request for rectification, blocking, or erasure of the personal data concerned, it shall, within 25 days of receipt of the request, communicate in writing or, with the consent of the person concerned, by electronic means, the factual and legal grounds for refusing the request for rectification, blocking or erasure. In case of refusal of a request for rectification, erasure, or blocking, the person concerned shall have the right to judicial remedy and the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information ("the Authority").

The data subject should address their complaint about the processing directly and, in the first instance, to the Data Controller before initiating proceedings before the Authority and before seeking judicial redress, using one of the following contact details:

Phone: +36 1 273 2610

Email: info@argonsoft.hu

Postal address: 1133 Budapest, Váci út 76.

If the cooperation between the Data Controller and the data subject does not result in a lawful situation, the data subject has the following enforcement options:

a. You can contact **the National Authority for Data Protection and Freedom of Information:**

address: 1055 Budapest, Falk Miksa utca 9-11.

postal address: 1363 Budapest, Pf. 9.

tel.: +36 (1) 391-1400

email: ugyfelszolgalat@naih.hu;

website address: <http://www.naih.hu>;

b. You may claim **damages and compensation:**

If the data controller causes damage to another person by unlawful processing of the data subject's data or by breaching data security requirements, the data controller must compensate the damage.

Suppose the controller infringes the data subject's right to privacy by unlawfully processing their data or by breaching data security requirements. In that case, the data subject may claim damages from the controller.

The controller is liable to the data subject for any damage caused by the processor, and the controller is also liable to pay the data subject the damages due in the event of a personal data breach caused by the processor. The controller shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that an unavoidable cause outside the scope of the processing caused the damage or the infringement of the data subject's personality rights.

No compensation shall be due, and no damages shall be payable where the damage or injury to the person concerned has been caused by the victim's intentional or grossly negligent conduct or by an infringement of a right relating to personality.

c. You can go to court:

In the event of a breach of the data subject's rights, or if the data subject does not agree with the decision of the controller on the objection submitted in relation to the processing, or if the controller fails to examine the objection within no more than 15 days, within 30 days of the notification of the decision or the last day of the period.

The controller must prove that the processing complies with the law. The court shall decide the case out of turn.

The court has jurisdiction to hear the case. At the option of the person concerned, proceedings may also be brought before the court of the place where the person resides or is domiciled.

V. OTHER PROVISIONS

Information about data processing not listed in this notice is provided at the time of collection.

We inform the data subjects that the court, the prosecutor, the investigating authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, the Hungarian National Bank, or other bodies authorized by law, may contact the Data Controller to provide information, communicate or transfer data, or make documents available.

The Data Controller shall disclose to public authorities personal data only to the extent that such disclosure is strictly necessary for the purpose of the request, provided that the public authority has indicated the precise purpose and scope of the data.

These Rules are protected by copyright, the exclusive right of which is vested in the author of these Rules on the basis of the individual, original character of the author's intellectual activity. Accordingly, it is prohibited

to copy, adapt, use as a model, sell, or permit any other use of the contents of these Rules (in whole or in part) to third parties without the author's written permission.

In the case of copyright infringement, the author can also claim damages against the person who made the unauthorized use under the rules of civil liability.

The Data Controller shall regularly review this Policy in view of changes in its activities, technological developments, changes in the scope of the data subjects, and other factors affecting its data management activities, and therefore, reserves the right to change this Policy.

In the event of any amendment of these Rules, the Data Controller shall communicate the new Rules, as amended, to the data subjects in an appropriate manner.