

# Zsidai Group Privacy Policy

## Privacy Policy

**This Privacy Policy explains how Zsidai Group collects, uses, stores, and protects your personal data when you visit our websites or use our services.**

### Principles of Data Management Principles of Data Management

Our company follows the following principles during data management:

We process personal data lawfully, fairly, and in a transparent manner.

We collect personal data only for specified, explicit and legitimate purposes and do not process it in a way that is incompatible with those purposes. The personal data we collect and process are adequate, relevant, and limited to what is necessary for the purpose of processing..

Our company takes all reasonable steps to ensure that data is accurate and up to date, and we delete or correct inaccurate personal data without delay..

We store personal data in a form that allows you to be identified only for the time necessary to achieve the purposes for which the personal data is processed.

We ensure the appropriate security of personal data against unauthorized or unlawful processing, accidental loss, destruction or damage by applying appropriate technical and organizational measures.

Our company processes your personal data as follows:

We process it, i.e. collect, record, organize, store and use it based on your prior informed and voluntary consent and only to the extent necessary and in all cases for a specific purpose.

In some cases, the processing of your data is based on legal requirements and is mandatory. kind, such in cases to this the to fact separately we will call the your

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attention. or in certain cases, our Company or a third party has a legitimate interest in processing your personal data, such as the operation, development and security of our website.

## Company Information

Who are we?

**Our company headquarters: 1014 Budapest Nandor street 9. Our Company's websites:**

Contact: Zsidai Group Ltd. Our postal address: 1014 Budapest Nandor street 9.

Our phone number: 06-1-225-0022 Our email address: Our tax number: 13667412-2-41

Our company registration number: 01 09 866987

**According to Article 37 of the GDPR, our company is not required to appoint a Data Protection Officer. .**

Our company storage space service providers name, address and contact information:

Expedient Ltd. 1147 Budapest, Sea urchin public 13. 2/12.

ADMIN Information technology Service provider Ltd. 1113 Budapest, Carolina beat 5. 4. eh. 1.

Horizon Information technology Ltd. 4034 Debrecen Rapeseed street. 3.

GoDaddy Inc., 14455 N Hayden Rd, SCOTTSDALE, THE, USA

Sered Hosting Professional, C/ Rua do Progress 177, THE Rua but Valdeorras, Ourense, Galicia

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**Our company uses the following data processors to ensure high-quality service delivery:**

If we modify the scope of our data processors, we will incorporate the changes in this notice.

Data We Process The by us treated data:

**We only request personal information from website visitors when they register, log in, or participate in a prize draw.**

We cannot link personal data provided in connection with registration or the use of our marketing services, and it is not our goal to identify our visitors.

You can request further information regarding your questions regarding data management at the e-mail address or at the above postal address of the Zsidai Group. We will send you our response without delay, within 30 days, to the contact information you provided.

## Cookies and How We Use Them

What are cookies and how do we use them?

Cookies are small data files (hereinafter referred to as cookies) that are transferred to your computer through the website when you use the website and are saved and stored by your internet browser. Most of the most commonly used internet browsers (Chrome, Firefox, etc.) accept and allow the downloading and use of cookies as a default setting, but it is up to you to decide whether to the browser settings with modification these refuses or disables, ill-

You can also delete cookies already stored on your computer. The "help" menu of each browser provides more information about the use of cookies.

**Some cookies do not require your prior consent. Our website will briefly inform you about these at the beginning of your first visit, such as authentication, multimedia**

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**player, load balancer, session cookies that help customize the user interface, as well as user-centric security cookies.**

**Our Company informs you about cookies requiring consent at the beginning of your first visit and requests your permission before activating them.**

Our company not to employ and not also allow so cookies, which allows third parties to collect data without your consent.

**Accepting cookies is not mandatory; however, our Company cannot guarantee full website functionality if cookies are disabled.**

## Types of Cookies We Use What kind cookies do we apply?

### **Third-party cookies:**

GOOGLE: <https://www.google.com/policies/technologies/types/> about data protection here <https://www.google.com/analytics/learn/privacy.html?hl=hu>

HOTJAR: <https://www.hotjar.com/legal/compliance/gdpr-commitment>

Social media plug-ins use

THE on our websites the following social media buttons we placed away:

Facebook Inc., 1601 S California Hey, Palo Alto, California 94304, USA  
<https://www.facebook.com/privacy/explanation>

Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA:

Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA:  
<https://help.instagram.com/155833707900388>

## YouTube Video Integration

To our websites youtube videos we integrated, which ones the They are stored on .

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Intermediary body: YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. Your data will not be shared with third parties without starting the video.

You can find Youtube's privacy policy here  
<https://www.google.com/intl/en/policies/privacy/>

## Google analytics

**Our websites use Google Analytics, a web analysis service provided by Google Inc. .**

THE cookies (cookies) using made data analysis for the purpose of use the Google.  
More information: <https://support.google.com/analytics/>

## Hotjar Analytics

**Our websites to perfect it the Hotjar Analytics software we use, deep all records user visits and prepares analyses.**

More information and GDPR compliance  
<https://www.hotjar.com/legal/compliance/gdpr-commitment>

## Data Storage

**Personal data (name, email address, phone number, etc.) collected through newsletter subscriptions and online reservations is stored securely in the Mailchimp system.**

Mailchimp 's policy is available at the following link :  
<https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation>

## Additional Information on Data Management

What else should you know about how we handle your data?

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THE personal data your voluntarily forgives at our disposal the registration and the With our company keeping in touch during, precisely because of this please, that your data gradually when communicated be careful those its authenticity, correctness and accuracy, because You are responsible for these. Incorrect, inaccurate or incomplete data may prevent you from using our services.

If you provide personal data of someone other than yourself, we assume that you have the necessary authorization to do so.

your the for data management given his/her consent anytime free can withdraw the registration by deleting, the for data management consent by withdrawing, or by withdrawing consent to the processing or use of any data that must be filled in during registration or by requesting its blocking.

Registration of withdrawal of consent – for technical reasons – We undertake this within a 30-day period, however, we would like to draw your attention to the fact that we may process certain data even after the withdrawal of consent in order to fulfill our legal obligation or to exercise our legitimate interests.

In the event of the use of misleading personal data, or if one of our visitors commits a crime or attacks our Company's system, we will immediately delete the data of the given visitor upon termination of their registration, or – if necessary – we will retain them for the duration of the determination of civil liability or the conduct of criminal proceedings.

## Direct Marketing and Newsletters

What do you need to know about our data processing for marketing and newsletter purposes?

By making a statement during registration and by modifying your personal data stored on the newsletter registration interface (i.e. by clearly expressing your intention to consent), you consent to us using your personal data for marketing purposes. In this case, until you withdraw your consent, we will also process your

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data for the purpose of sending newsletters and will send you advertising and other mailings, as well as information and offers and/or forward newsletters (Section 6 of the Hungarian Data Protection Act).

your the his/her consent the newsletter regarding anytime free you can cancel it.

In all cases, cancellation of registration is considered a withdrawal of consent. Withdrawal of consent for data processing for direct marketing and/or newsletter purposes is not interpreted as withdrawal of consent for data processing related to our website.

The registration of the withdrawal or cancellation of individual consents is not possible – for technical reasons – We accept with a 30-day deadline.

## Prize Games

What should you know about our prize games?

Our company may organize prize games as a campaign, the specific terms and conditions of which are contained in separate regulations. The regulations of the current campaign can always be found on the link provided on our website.

## Other Data Management Provisions

### Additional Questions

We can only transfer your data within the framework specified by law, and in the case of our data processors, we ensure by stipulating contractual conditions that they cannot use it without your consent. your personal data for the opposite purposes. For more information, see Section 2.

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Our company abroad not forward data.

The court, the prosecutor's office and other authorities (e.g. the police, the tax office, the National Data Protection and Freedom of Information Authority) may contact our Company to provide information, disclose data or make documents available. In these cases, we must fulfill our data provision obligation, but only to the extent strictly necessary to achieve the purpose of the request.

Participate in our company's data management and/or data processing The customer's collaborators and employees are entitled to access your personal data to a predetermined extent, subject to a confidentiality obligation.

We protect your personal data with appropriate technical and other measures, and we provide the data your safety, available his/her job, furthermore we protect those from unauthorized access, alteration, damage or disclosure and any other unauthorized use.

As part of organizational measures, we control physical access in our buildings, our employees continuously we teach and the paper based documents We keep it locked up with appropriate protection. As part of the technical measures, we use encryption, password protection and anti-virus software. However, we would like to point out that data transmission via the Internet cannot be considered as completely secure. Our company does everything in its power to make the processes as secure as possible, but we cannot assume full responsibility for data transmission via our website, but we adhere to strict regulations regarding the data received by our company in order to ensure the security of your data and prevent illegal access.

Regarding security issues, we ask for your help in carefully keeping your access password for our website and not sharing this password with anyone.

Which ones the your rights and legal remedy possibilities?

your about data management information you can ask, you can ask the by us treated personal their data correction, modification, addition, can object the data



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management against and you can ask your data deletion as well as locking (except for mandatory data processing), court before with legal remedy can live,

You can file a complaint with the supervisory authority or initiate proceedings (<https://naih.hu/panaszuegyintezes-rendje.html>).

Supervisor Authorities: National Privacy and Freedom of information Authorities

Headquarters: 1125 Budapest, Szilágyi Elizabeth avenue 22/c.

Correspondence title: 1530 Budapest, Pf.: 5.

Phone: +36 (1) 391- 1400

Fax: +36 (1) 391- 1410

Website:<https://naih.hu/>

Information at your request we give you the information we handle, or the processed by us – or by our commissioned data processor about your data, those about its source, the data management about its purpose and its legal basis, its duration, if and this not possible, on this period on the aspects of its determination , the name, address and activities of our data processors related to data processing , the circumstances and effects of data protection incidents and the measures we have taken to address and prevent them, and

In the event of the transfer of your personal data, the legal basis and recipient of the data transfer.

We will provide you with the information as soon as possible, within 30 days of the submission of the request. The information is free of charge, unless you have already submitted a request for information to us regarding the same data set in the current year. We will refund the costs you have already paid if the data has been processed unlawfully or the request for information has led to a correction. We may refuse to provide information only in cases provided for by law, indicating the legal place and informing you about the possibility of legal redress or contacting the Authority.

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Our company will notify you and all those to whom the data was previously forwarded for data processing about the correction, blocking, marking and deletion of personal data, unless the failure to notify does not violate your legitimate interests .

If we do not comply with your request for rectification, blocking or erasure, we will communicate the reasons for our refusal in writing or – with your consent – electronically within 30 days of receipt of the request and inform you of the possibility of judicial redress and of contacting the Authority.

If you object to the processing of your personal data, we will examine the objection as soon as possible, within 30 days of submitting the request, and we will inform you of our decision in writing. If we decide that your objection is well-founded, we will terminate the data processing – including further data collection and transmission – and block the data, and we will notify all those who have objected to the objection and the measures taken based on it. for the with protest concerned personal data previously we forwarded it, and who are obliged to take action to enforce the right to protest.

In that the in case we deny the request fulfillment if we prove, that the data processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or which serve to assert or assert legal claims, to validate or for protection are connected. If If you disagree with our decision or if we miss the deadline, you may go to court within 30 days of the notification of the decision or the last day of the deadline.

The adjudication of data protection lawsuits falls within the jurisdiction of the court, and the lawsuit may also be initiated – at the choice of the data subject – before the court of law of the place of residence or residence of the data subject. Foreign citizens may also file a complaint with the supervisory authority competent for their place of residence.

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We kindly ask you to contact our Company before submitting your complaint to the supervisory authority or court – in order to facilitate consultation and resolve the problem as quickly as possible.

## Applicable Laws

What laws govern our activities?

Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing of personal data of natural persons (GDPR) the informational self-determination about law and on freedom of information Act CXII of 2011 on – (Info Act) the Civil About the Code solo 2013. annual Sun. Act (Civil Code)

Act of 2001 on certain issues of electronic commerce services and services related to the information society Act CVIII – (Eker Act) the electronic about communication solo 2003. annual C. law – (Ehtv) the on consumer protection solo 1997. annual CLV. law (Weight TV.)

Act CLXV of 2013 on Complaints and Public Interest Notifications (Pktv.) on the basic conditions and certain limitations of economic advertising activity Act XLVIII of 2008 on the

## Changes to This Privacy Policy

### Modification of Data Management Information

Our company reserves the right to amend this Data Management Notice, of which it will inform the data subjects in an appropriate manner. Information related to data management is published on the website .

# **Zsidai Group Privacy Policy**

Budapest, 2018. May 24.