

# swipelime Privacy Policy

## **swipelime Privacy Policy**

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## **I. NAME OF THE CONTROLLER**

Name of data controller: Swipelime Korlátolt Felelősségű Társaság

Head office: 1054 Budapest, Vadász utca 42. 3. em. Door 5.

Company registration number: 01-09-420748

Tax number: 32373934-2-41

## II. DATA PROCESSING IN RELATION TO THE SWIPELIME PLATFORM

### II.1. Contacting us, contacting us through the website

The Data Controller provides the possibility for interested parties to contact him/her for further information through the Contact section of the website. To this end, the Controller processes personal data as described below:

Scope of personal data processed:	<ul style="list-style-type: none"><li>- Surname and first name</li><li>- E-mail address</li><li>- Message content</li></ul>
Purpose of processing:	<ul style="list-style-type: none"><li>- Making contact, maintaining contact, providing information</li></ul>
Legal basis for processing:	<ul style="list-style-type: none"><li>- The Data Controller's legitimate interest in the proper performance of the service (Article 6(1)(f) GDPR)</li></ul>
Duration of data processing:	<ul style="list-style-type: none"><li>- The date of the obligation to erasure (exercise of the right to object or to erasure), but not more than 6 months after the contact.</li></ul>
Recipients:	
Rights of the person concerned:	<ul style="list-style-type: none"><li>- Rights of access, rectification, erasure, objection and restriction of processing</li></ul>

## II.2. Contractual relations

The Data Controller maintains contact with the persons designated for this purpose in its contracts with its partners. To this end, the Controller processes personal data as follows:

Scope of personal data processed:	<ul style="list-style-type: none"><li>- Surname and first name</li><li>- E-mail address</li><li>- Phone number</li><li>- Job title</li></ul>
Purpose of processing:	<ul style="list-style-type: none"><li>- Contacts for the performance of the contract</li></ul>
Legal basis for processing:	<ul style="list-style-type: none"><li>- In the case of a contact person of a non-natural person, the Data Controller's legitimate interest in the performance of the contract (Article 6(1)(f) GDPR), in the case of a natural person, the performance of the contract (Article 6(1)(b) GDPR)</li></ul>
Duration of data processing:	<ul style="list-style-type: none"><li>- 5 years after the termination of the contract (statute of limitations under the Civil Code)</li></ul>
Rights of the person concerned:	<ul style="list-style-type: none"><li>- Rights of access, rectification, erasure, objection, portability and restriction of processing</li></ul>

### II.3. Staff registered on the Platform

The Data Controller's contractual partners can register their employees on the swipelime platform in order to use the platform. To this end, the Data Controller processes personal data as follows:

Scope of personal data processed:	<ul style="list-style-type: none"><li>- E-mail address</li><li>- Workplace</li><li>- Password</li></ul>
Purpose of processing:	<ul style="list-style-type: none"><li>- Register for a user account created to use the platform</li></ul>
Legal basis for processing:	<ul style="list-style-type: none"><li>- The Data Controller's legitimate interest in the proper performance of the service (Article 6(1)(f) GDPR)</li></ul>
Duration of data processing:	<ul style="list-style-type: none"><li>- Until the termination of the contract with the partner, but not later than the termination of the employment or employment relationship with the partner</li></ul>
Recipients:	<ul style="list-style-type: none"><li>- Contracted partner</li></ul>
Rights of the person concerned:	<ul style="list-style-type: none"><li>- Rights of access, rectification, erasure, objection and restriction of processing</li></ul>

### **III. DATA SECURITY**

The Data Controller and the data processors are entitled to access your personal data to the extent necessary for the performance of their tasks. The Controller shall take all security, technical and organisational measures necessary to ensure the security of the data.

#### **III.1. Organisational measures**

The Data Controller allows access to its IT systems with rights that can be linked to an individual. The allocation of access is based on the principle of "necessary and sufficient rights", i.e. each user may use the Data Controller's IT systems and services only to the extent necessary for the performance of his/her task, with the corresponding rights and for the necessary duration. Access rights to IT systems and services may be granted only to persons who are not restricted for security or other reasons (e.g. conflict of interest) and who have the necessary professional, business and information security skills to use them safely. The Data Controller and the Processor undertake in a written declaration to observe strict confidentiality rules and to act in accordance with these confidentiality rules in the course of their activities.

#### **III.2. Technical measures**

The Data Controller uses GDPR compliant third party data processors (see Annex 3) to store data. The data is stored redundantly, i.e. in multiple locations, to protect them from destruction, loss, damage or unlawful destruction due to IT equipment failure. The Data Controller protects its internal networks from external attacks by means of a multi-layered, active, complex protection against malicious code (e.g. virus protection). The Data Controller shall provide the necessary external access to the IT systems and databases operated by the Data Controller via encrypted data connections (TLS). The Data Controller shall make every effort to ensure that its IT tools and software are continuously in line with the technological solutions generally accepted in the market. The Data Controller shall develop systems whereby operations can be controlled and monitored through logging, and incidents such as unauthorised access can be detected.

## **IV. YOUR RIGHTS**

It is important for the Data Controller that its processing complies with the requirements of fairness, lawfulness and transparency. In order to ensure that you are aware of your rights and the conditions for exercising them, we provide you with the following information.

### **IV.1. Access**

You have the right to obtain access to your personal data processed by the Data Controller, upon request made to one of the contact details of the Data Controller. In this context, you will be informed of the following:

- whether your personal data are being processed;
- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom or which the personal data have been or will be disclosed;
- the intended duration of the storage of the personal data;
- your rights;
- your remedies;
- information on data sources.

You may also request the Data Controller to provide you with a copy of the personal data subject to processing. In this case, the Data Controller will provide the personal data in a structured, commonly used, computer-readable format (PDF/XML) or in a printed paper version. The request for a copy is free of charge.

### **IV.2. Correction**

You have the right to request, on the basis of a request made through the contact details of the Data Controller, the rectification of inaccurate personal data concerning you processed by the Data Controller and the completion of incomplete data. Where the information necessary to correct or complete the inaccurate information is not available to the Controller, the Controller may request the submission of such additional data and the verification of the accuracy of the data. As long as the clarification or completion of the data cannot be carried out in the absence of the additional information, the Controller shall restrict the processing of the personal data concerned, temporarily suspend the operations performed on them, with the exception of storage.

### **IV.3. Deletion**

You have the right to request the erasure of personal data concerning you processed by the Data Controller, on the basis of a request submitted through the contact details of the Data Controller, if one of the following conditions applies:

- the Data Controller no longer needs the data concerned;
- you have concerns about the lawfulness of the processing of your data by the Data Controller.

If, following your request, the Controller determines that there is an obligation to erase the personal data it has processed, it shall cease processing the data and destroy the personal data previously processed. In addition, the obligation to erase personal data may also exist on the basis of withdrawal of consent, the exercise of the right to object or legal obligations.

#### **IV.4. Limitation of processing**

You have the right to request, on the basis of a request made through the contact details of the Data Controller, the restriction of the processing of personal data concerning you processed by the Data Controller in the following cases:

- you are concerned about the lawfulness of the processing of personal data relating to you by the Controller and request the restriction instead of the deletion of the data;
- the Data Controller no longer needs the data, but you require them for the establishment, exercise or defence of legal claims.

The Data Controller will automatically restrict the processing of personal data if you contest the accuracy of the personal data or if you exercise your right to object. In such cases, the restriction shall apply for a period of time which allows the accuracy of the personal data to be verified or, in the event of an objection, to determine whether the conditions for continued processing are met.

During the period of restriction, no processing operations may be performed on the personal data concerned, only storage of the data. Personal data may be processed in the event of restriction of processing only in the following cases:

- with the consent of the data subject;
- bring, maintain or defend legal claims;
- protect the rights of another natural or legal person;
- important public interest.

The Data Controller will inform you in advance of the lifting of the restriction.

#### **IV.5. Objections**

You may object to the processing of your personal data based on the legitimate interests of the Controller at any time, on the basis of a request made through the contact details of the Controller. In this case, the Controller will examine whether there are compelling legitimate grounds or interests (e.g. the establishment, exercise or defence of legal claims) which override the interests, rights and freedoms of the data subject. Where such grounds or interests can be identified, the Controller shall continue to process the personal data. Otherwise, the personal data may no longer be used.

#### **IV.6. Data portability**

You have the right to request, on the basis of a request made through the contact details of the Data Controller, the provision of personal data concerning you processed by the Data Controller for further use as you have specified. You may also request the Controller to transfer your personal data to another controller designated by you.

This right is limited to the personal data you have provided to us and which are processed in accordance with Article 6(1)(b) of the GDPR. No other data may be carried. The Data Controller will provide the personal data in a structured, commonly used, computer-readable format (PDF/XML) or in a printed paper version. The Controller informs you that the exercise of this right does not automatically entail the deletion of personal data from the Controller's systems. In addition, you have the right to contact or communicate with the Controller again after the data have been transferred.

#### **IV.7. Procedure in relation to your request to exercise your rights**

The Data Controller shall inform you of the action taken on your request to exercise your rights without undue delay and within a maximum of 1 month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further 2 months. The Data Controller shall inform you of the extension, stating the reasons for the delay, within 1 month of receipt of the request.

If the Data Controller does not act on your request, it will inform you without delay and at the latest within 1 month of receipt of the request of the reasons for the failure to act and of the possibility to lodge a complaint with a supervisory authority and exercise your right to judicial remedy. The Controller shall provide the information concerning the action or the failure to act in the form specified by you. If you have submitted the request by electronic means, the information will be provided by electronic means unless you request otherwise. The Controller shall provide the requested information and communication free of charge. The Controller shall inform any recipient to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing that it has carried out, unless this proves impossible or involves a disproportionate effort. Upon your request, the Controller will inform you of these recipients. In order to comply with the request, the Data Controller must ensure that the data subject is the person who intends to exercise his or her rights. This may also require, where appropriate, that you appear in person at the Data Controller's registered office for identification purposes.



## **V. YOUR REMEDIES**

If the Data Controller processes your personal data in an inappropriate manner, contrary to the law, or if the Data Controller has not complied with your request to exercise your rights or has not complied with them in an appropriate manner, you have several legal remedies.

### **V.1. Complaints to the National Authority for Data Protection and Freedom of Information**

If you object to the activities of the Data Controller, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information at one of the following contact details:

Head office: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf. 9.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

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

Online case start: <http://www.naih.hu/online-uegyinditas.html>

### **V.2. Judicial enforcement**

You also have the right to take legal action against the Data Controller's actions, in addition to the administrative remedies. The GDPR, the Infotv. and the rules of the Civil Code and the Civil Procedure Code apply to the lawsuit. The court of law has jurisdiction to decide on the lawsuit. The lawsuit may also be brought, at the option of the data subject, before the court of the place of residence of the data subject (for a list of courts and their contact details, please consult the following link: <http://birosag.hu/torvenyszekek>).

### **Annex 1: Relevant legislation**

In drafting this Notice, the Data Controller has taken into account the applicable laws in force and the main international recommendations, in particular:

- 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 (GDPR);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information Act CXII of 2011 (Infotv.);
- Act C of 2000 on Accounting (Accounting Act);
- Act V of 2013 on the Civil Code (Civil Code Act);
- Act CXXX of 2016 on the Code of Civil Procedure (Pp).

### **Annex 3: Names and details of data processors**

- MongoDB Inc. New York, NY 10019, 1633 Broadway, 38th Floor, USA
- Meteor Software Limited Partnership, 101 - 524 Yates Street, Victoria, BC V8W 1K8, Canada
- ImageKit Inc. Christiana Corporate Business Center, 200 Continental Drive, Suite 401, Newark, DE, 19713, USA