

DATA PROCESSING PROSPECTUS

The purpose of the present prospectus is to lay down the data protection and processing principles applied by the www.confcat.com website operator, that is *fps ecosystem Kft.* (referred to as *Service Provider*), and his data protection and processing policy, which is expressed to be bound by the *Service Provider*, since the his aim is to secure the users' personal data to the fullest possible extent.

By using the website, any of its services, and ordering (newsletter, application, etc.) the *User* gives his consent to handle his personal data in accordance with the present Data Processing Prospectus.

I. DATA OF THE PROVIDER, AS THE CONTROLLER

fps ecosystem Kft.

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data processing register number: NAIH-88038/2015.
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II. DEFINITIONS

Expressions in the present prospectus shall be interpreted according to the terms defined by the explanatory notes of the [Act CXII. of 2011](#) on the Right of Informational Self-Determination and on Freedom of Information (referred to as Info Act), as follows.

Personal data: any data that can be associated with the Data Subject, and in particular by reference to the name and identification code of the Data Subject, or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity, as well as conclusions that can be drawn from the data with regard to the Data Subject;

Data Subject: any natural person who has been identified or is identifiable, whether directly or indirectly, by reference to specific personal data;

Consent: shall mean any specific and informed indication of the will of the Data Subject given freely and expressly by which he signifies his unambiguous agreement to personal data relating to him being processed fully or to the extent of specific operations;

Data processing: any operation or the totality of operations performed on the data, irrespective of the procedure applied, and in particular collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans);

Controller: any natural person or legal entity, or any organisation without legal entity status that alone or jointly with other persons determines the purpose of the processing of data; makes and executes the decisions regarding data processing (including the means used), or contracts a data processor to execute it;

Data transfer: ensuring access to the data for a specific third party;

Disclosure: ensuring open access to the data for anyone;

Deletion of data: making the data unrecognisable in a way that their restoration is not possible anymore;

Tagging data: marking data with a special ID tag to differentiate it;

Distraint of data: marking data with a special ID to definitely or indefinitely restrict their further processing;

Data processing: performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data;

Data processor: any natural person or legal entity, or any organisation without legal entity status processing the data under a contract, including contracts concluded pursuant to statutory provisions;

III. DATA MANAGEMENT PRINCIPLE

The *Service Provider* handles the recorded data in accordance with the present prospectus, in accordance with the up-to-date version of the data protection legislation – with special regard to the Info law.

IV. LEGAL GROUNDS OF DATA PROCESSING

During the data processing related to the website operations and services, the recording and handling personal data is based on voluntary consent from the Data Subject.

The *User* gives his consent by using or ordering the service of the website.

The *Service Provider* is entitled to send newsletter or other advertising letter to the *User*, if the *User* gave his consent in advance, unambiguously, definitely and voluntary when he registered with his appropriate data. The *Service Provider* is not obliged to control if the data given by the *User* when ordering any product, or when giving consent, are true and current.

The *User* is entitled to anytime withdraw his voluntary consent referred to in the preceding point. In this case, after the withdrawal the *Service Provider* shall not send newsletters or other advertising letters to the *User* anymore, and also shall delete the *User's* data from the subscribed users' data.

Unless the legislation provides otherwise, the *Service Provider* may process recorded personal data to fulfil the legal obligation imposed on him (in particular the accounting liability, the contractual obligation bound with the *User*), and to defend personal or third person's legal interest, if the enforcing of these interests is in proportion with the limitation to the right of personal data protection, without further special consent or after the withdrawal of the *User's* consent.

V. SCOPE OF DATA PROCESSED

While ordering and implementing the *Service Provider's* services, he processes – based on the *User's* voluntary consent – the *User's* following personal data: name, email address, telephone number, company name, tax number, and company address.

Only the *User* is responsible for the veracity and accuracy of the personal data. The *Service Provider* does not bear financial and moral responsibility for damages resulting from wrongly completed forms, or deliberate counterfeit.

VI. THE PURPOSE OF DATA PROCESSING

The purpose of processing the *User's* personal data is providing the service indicated on the website, in particular: ordering the service, performing the service, preventing unauthorised persons to access personal data, to fulfil accounting liabilities, and to send newsletter or advertising letter mentioned in point IV. as well as to fulfil the *Service Provider's* other legal obligations. The *Service Provider* does not make the *User's* personal data accessible to unauthorised third parties.

VII. DURATION OF DATA PROCESSING, MODIFYING AND DELETION OF DATA, OPPOSITION TO DATA PROCESSING

The *Service Provider* handles the personal data concerning the service only until the aim of data processing is achieved.

When using applications, the *Service Provider* deletes all the data uploaded by users among the data processed after the expiry of the service period, that is, after four months.

The *User* may anytime modify his personal data, provided when he ordered the service, after logging in on the website.

The *User* may request the *Service Provider* to delete his personal data by electronic mail sent to the hello@confcat.com email address. The *Service Provider* shall delete the *User's* personal data without the Data Subject's request, if the handling of such data is against the law, the purpose for which data was processed no longer exists, the legal time limit for storage has expired, it was so ordered by court or by the Hungarian Authority for Data Protection and the Freedom of Information, or the data processing is incomplete or inaccurate and it cannot be lawfully rectified, provided that the law does not exclude deletion.

Personal data shall be blocked instead of deleted if so requested by the *User*, or if there are reasonable grounds to believe that erasure could affect the *User's* legitimate interests. The *Service Provider* shall only process the blocked personal data as long as the particular purpose of data processing, which prevented the erasure of the personal data, exists. After the *User* having withdrawn his consent, the *Service Provider* can handle the personal data concerning the Subject Data in order to fulfil his obligations covered in the legislation (with special regard to accounting liabilities).

The *User* can oppose the deletion of his personal data by electronic mail sent to the hello@confcat.com email address,

- if the processing or transfer of personal data is carried out solely for the purpose of fulfilling the *Service Provider's* legal obligations, or for enforcing the rights and legitimate interests of the controller, the recipient or a third party, except for mandatory data processing;
- if personal data is used or disclosed for the purposes of direct marketing, public opinion polling or scientific research; and
- in any other cases prescribed by law.

VIII. REQUEST FOR INFORMATION

The *User* is entitled to anytime request for information about personal data regarding him, at the hello@confcat.com email address. For the *User's* request, the *Service Provider* shall provide information about the data regarding the *User*, about their source, the purpose of data process, the legal ground of data process, and period of time of data process, the controller's name and address, the legal ground of the data transfer and its addressee, and the data processing activities. The *Service Provider* shall provide the information in a written and comprehensible form for the *User's* request as soon as possible, but no later than within 30 days after the submission of the request. The information is free of charge. The request sent from the email address which had been provided to the *Service Provider* is considered as a request made by the *User*. The *User* can make a request from other email addresses and in writing, if he appropriately justifies his being the *User*.

IX. ENFORCEMENT OPTIONS

The *User* may exercise his law enforcement options under the Info Act and the V. Act of 2013. (Civil Code) before a court, and concerning any questions about personal data he can ask the help of the National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/c, postal address: 1530 Budapest, Pf. 5., ugyfelszolgalat@naih.hu, (+36) 1 391 1400, www.naih.hu).