

# DATA PROTECTION AND DATA PROCESSING POLICY

## 1. PURPOSE OF THE POLICY

The purpose of this Policy is to set forth the principles of data protection and data processing applied by NEXTENT Informatika Zrt. during the provision of the **Pick-a-Printer** service, and to set down the Company's policy of data protection and data processing.

## 2. NAME OF THE DATA PROCESSOR

**NEXTENT Informatika Zrt. (hereinafter: "Nextent")**

Registered office and mailing address: 1138 Budapest, Madarász Viktor u. 47-49.

Company registration number: 01-10-045260

VAT ID: 13522225-2-41

Telephone: +36 1 246 2907

E-mail: hello@pickaprinter.com

Data processing registration number: NAIH-83388/2015

## 3 SCOPE OF PERSONAL DATA PROCESSED

**3.1** Registration During registration the following personal data shall be mandatorily submitted by the User:

- username,
- his/her own e-mail address,
- password.

Please note that the Service Provider shall not perform any data handling or data processing operation concerning any personal data contained in the documents uploaded during using the Service, and it shall bear no liability whatsoever regarding the contents of the documents.

**3.2** The scope of data to be technically recorded during the operation of the system are data of the logged-in user's computer, generated in the course of using the service and recorded by the data processing system automatically as the result of the technical processes. Automatically recorded data shall be entered by the system automatically in the log upon logging in and logging out, without any specific instruction or act by the User. Such data cannot be linked to other personal user data, with the exception of the cases made mandatory by the law. Only the data processor shall have access to the data.

**3.3** During the visits to the website Nextent shall send one or more cookies – small files containing a set of characters – to the visitor's computer in order to make the visitor's browser individually identifiable. The cookies are provided by Google and they are used through the Google Adwords system. These cookies will only be sent to the visitor's computer in the case of visiting specific sub-pages, and therefore these cookies will not store any other information than the fact that the given sub-page was visited and the date of the visit.

The cookies sent this way will be used in the following manner: external service providers, including Google, use these cookies to store information on whether the user has already

visited the advertiser's website before, and based on this information they place advertisements for the user on the internet websites of external service provider partners, including those of Google. Users may block Google cookies on the page used for switching off Google ads. (Users may also be informed that they have an option to block cookies by external service providers on the unsubscribe page of the Network Advertising Initiative.)

Cookies applied:

- Analytics, tracking cookie
- Tracking through the website
- Login, user identification session cookie

The "Help" function found in the menu of most browsers contains information about the options available in the browser for

- blocking cookies,
- accepting new cookies, or
- instructing the browser to set a new cookie, or
- switching off other cookies.

#### **4 LEGAL BASIS, PURPOSE AND METHOD OF DATA PROCESSING**

**4.1** Data processing is based on the voluntary statement made on the basis of informed consent by the users of the internet contents found on the pickaprinter.com website (hereinafter: "Website"), such statement containing the users' explicit consent to use their personal data communicated in the course of using the website. The legal basis of data processing is the voluntary consent given by the data subject in accordance with Article 5 (1) a) of the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information. User's consent for individual data processing will be given by way of using the Website, by registration and by providing the relevant data on a voluntary basis.

**4.2** The purpose of data processing is to enable the provision of the Pick-a-Printer service (hereinafter: "Service") accessible on the Website. The Service Provider shall store the data submitted by User only for the specific purpose of enabling the provision of the Service, for sending the newsletter, if the user has subscribed to the newsletter, and for the subsequent verification of the terms of any contract that may have been concluded by the parties.

**4.3** Data are recorded automatically for the purpose of preparing statistics, the technical development of the IT system and the protection of users' rights.

**4.4** The data processor shall not and may not use the personal data provided for any purpose other than specified herein. Personal data shall only be disclosed to third persons or authorities upon the user's explicit prior approval, save as regulated otherwise in any mandatory provision of the law.

**4.5** The data processor shall not check the personal data entered. Only the person submitting the data shall be responsible for the correctness of the data entered. Submitting an e-mail address by any user is considered at the same time as an undertaking by the relevant user to be

the only user using the services from the respective e-mail address. With regard to this undertaking, any liability related to logins using a given e-mail address shall be limited to the user who registered the e-mail address in question.

## **5 TERM OF DATA PROCESSING**

**5.1** Processing of mandatory personal data provided upon registration shall commence with the registration and shall end with deleting those data. Processing of non-mandatory data shall last from providing the data until the deletion of such data. The registration can be deleted by the User or by the Service Provider at any time in the cases and in the manner specified in the Terms of Use (hereinafter: ToU).

**5.2** Logged data shall be stored in the system for 6 (six) months from the date of entry of such data into the log, with the exception of the date of the last visit, which is overwritten automatically.

**5.3** The above provisions shall not affect the performance of the safekeeping obligations specified by the law (e.g. in the legal regulations on accounting) and the processing of data on the basis of further consents given during the registration on the Website or otherwise.

## **6 THE SCOPE OF PERSONS HAVING ACCESS TO THE DATA, DATA FORWARDING, FURTHER DATA PROCESSING**

**6.1** Service Provider and the staff members of Service Provider shall have primary access to the data, however they may not disclose such data or forward them to third persons.

**6.2** Service Provider may contract a further data processor (e.g. system operator, accountant) for operating the background IT system, performing the Service and for settling accounts. Service Provider shall not be held liable for the data processing practices of such external partners.

**6.3** Furthermore, personal data related to the User may only be forwarded in cases regulated in the law or on upon User's consent.

## **7 USER RIGHTS AND THE WAYS OF ENFORCING RIGHTS**

**7.1** User may at any time request information concerning his/her personal data processed by Service Provider, and he/she may modify his/her data at any time. User may also request the deletion of his/her data by way of the contacts provided herein.

**7.2** Upon User's request, Service Provider shall provide information on the data related to the User and processed by Service Provider, on the purpose, legal basis and the term of data processing, as well as on the persons who receive or have received user's data, including the purpose of disclosure. Service Provider shall provide the requested information in writing within 30 days of submitting a request to this end.

**7.3** The affected party may exercise the above rights via the following contacts:

**Mailing address:** 1138 Budapest, Madarász Viktor utca 47-49.

**E-mail:** [hello@pickaprinter.com](mailto:hello@pickaprinter.com)

The User may contact the designated staff member(s) of Service Provider regarding any question or comment related to data processing, via the contacts specified in Section 7.3.

**7.4** The User may at any time request the rectification or the deletion of his/her data recorded incorrectly. The User himself/herself may rectify some of his/her data on the Website; in other cases the Service Provider shall delete the data within 3 (three) working days upon receipt of a request to this end, in which case the deleted data will not be restorable. Deletion will not be applicable to the processing of data required by the law (e.g. accounting regulations), and such data will be retained by the Service Provider for the prescribed period.

**7.5** The User may enforce his/her rights at court on the basis of the Act on the Freedom of Information and the Civil Code of Hungary, and he/she may also turn to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH) (1125 Budapest, Szilágyi Erzsébet fasor 22/C) in case he/she has any complaint related to the data processors data processing practice.

**7.6** If, in the course of registration, the User entered the data of third persons for using the service, or if he/she has caused any damage whatsoever when using the Website, Service Provider may enforce the claim for damages against the User. In such cases the Service Provider shall provide all the expectable assistance to the authorities in charge to allow the identification of the infringing person.

## **8 USING E-MAIL ADDRESSES**

**8.1** Service Provider shall in particular provide for the lawful use of the e-mail addresses it processes, therefore it will only use such addresses in the following ways for sending out e-mails (for the purpose of information or advertisement).

**8.2** The primary aim of processing e-mail addresses is the identification of the User and maintaining contact with the User during the provision of the Service, therefore processing serves the primary purpose of sending e-mails.

**8.3** In the case of changing the Service provided by the Service Provider or the Terms of Use, in certain cases the information on this modification will be sent by the Service Provider in e-mail to the parties concerned. It is not possible to unsubscribe from this “notification list”, however the Service Provider shall not use such notices for advertising purposes.

**8.4** Service Provider will only send advertisements (newsletters) to the electronic mailing address entered during registration if the User has approved to this explicitly, in the cases and in the manner specified by the provisions of the law. The User may at any time unsubscribe from the newsletter by using the link placed at the bottom of the newsletter.

## **9 OTHER PROVISIONS**

**9.1** Service Provider’s system may collect data on the users’ activity, and such data may not be linked to other data entered by the users during registration, or to the data created in the course of using other websites or services.

**9.2** In any case when Service Provider intends to use the data entered for any purpose other than the aim of the original data collection, it shall inform the User thereon and obtain the User's explicit prior consent to do so, and allow the User to prohibit such use of the data.

**9.3** Service Provider undertakes to guarantee the security of the data and to take all the technical measures needed to grant the safety of the data collected, stored and processed, and it shall make all efforts to prevent the destruction, unauthorized use and unauthorized amendment of such data. Service Provider furthermore undertakes to call upon all third parties who may receive such data to undertake the same.

**9.4** Service Provider hereby retains the right to modify this Policy unilaterally upon prior notice sent to the Users. After the effective date of the modification, using the Services by the User will be considered as an implied conduct of accepting the terms of the modified Policy.

Budapest, 11 November 2015