

# **Privacy Policy**

Effective from 2022.06.01.

Last updated: 2023.08.29.

## **Introduction**

4D Consulting Kft. (hereinafter: Service Provider, data controller) submits itself to the following prospectus. This Privacy Policy outlines the practices of Projexel ("Projexel," "we," "our," or "us") regarding the collection, usage, and disclosure of information from users of the Projexel website (<https://www.projexel.eu>) and the Services, including the application "Projexel." More precisely, this privacy statement describes how the Service Provider collects, uses and discloses your personal information when you visit an ecommerce website. On the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation (EC) No 95/46 (General Data Protection Regulation), REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 2016/27) we provide the following information.

Changes to this Privacy Policy will be effective upon posting at the above address.

The information we receive about you can come from various sources, such as your user account on the Services (when you register), your general use of the Services, and third-party websites and services. By using the Services, you are giving your consent to the collection, transfer, manipulation, storage, disclosure, and other usage of your information as outlined in this Privacy Policy. If you do not agree with our policies and practices, please do not use the Services. If you have any questions or concerns, please reach out to us at [info@projexel.eu](mailto:info@projexel.eu)

This is a user-friendly summary and not the substitute for the law-friendly data processing brochure provided on the following pages.

## **Who are we?**

**Company name:** 4D Consulting Kft.

**Address:** 6000 Kecskemet, Karolyi utca 6. Hungary

**CEO:** Roland Zonai

**Email:** [info@projexel.eu](mailto:info@projexel.eu)

**Phone:** +36 (30) 6500212

## **What do we do?**

We respect your rights and aspire for satisfying your requests within the statutory deadlines.

We process your data as we expect others to process our data.

As a Hungarian company, we provide a cloud-based documentation generation and management system. Protecting your personal data is a priority for us. We take care of your

data, transfer them via encrypted channels, never sell them to anyone else and never use them for any purposes other than for what you have provided them.

We have our website; we measure its use, maintain a log for security reasons, we have online marketing with targeted campaigns, we process the data given by you, as a data processor we help your company with the innovation consulting solution.

If you require so, we will issue your data after identification. If you require it, we will erase your data.

#### Our services

- Website

We log the visits to our website for security reasons (IP address, viewed pages). With Google Analytics, we track what you view to produce more and more interesting content for you (cookies). Facebook and Google AdWords cookies are added to your browser; later you can see Projexel ads through these providers. We erase these data after 90 days.

- Newsletter

You can subscribe to our newsletter by submitting your email address and your name. We will email you about new features, opportunities of free tutorials, and ideas useful for document generation and management. We'll send you an unsubscribe link in each email so that if you change your mind, you can cancel it at any time. We store your data for 365 days after the last interaction.

- Free workshop

If you submit your name, email address, phone number for our free workshop, we will inform you through these channels. Our consultants will contact you using the contact details given by you to schedule a workshop appointment, and if you are interested, they will present the system and help you to acquaint yourself with it. We will email you about new features, opportunities of free tutorials, and ideas useful for client management. If at any time you indicate that it was enough, we would not contact you anymore; if you request, we will erase your data. Otherwise, we will store your data for 365 days after the last interaction.

- Free system testing

If you wish to try our software, you can start a free system testing at any time by giving your name and email address. Using the contact details given by you, our consultants will contact you to show you the system and help you to acquaint yourself with it. We will email you about new features, opportunities of free tutorials, and ideas useful for client management. If at any time you indicate that it was enough, we would not contact you anymore; if you request, we will erase your data. Otherwise, we retain your contact details and out notes in our CRM system for 365 days after our last contact. In order to use our software, you must accept our General Terms and Conditions upon the registration. We log the use of the system for security reasons. We retain the data in various details for 365 days. The client data you have recorded in your test system and entrusted to us as a processor will be permanently erased 90 days after the test system is closed (during this period you can start subscription without re-recording your data recorded in the test system).

- Subscription

If you subscribe to Projexel services, we process your data as in the case of a free test account (see above). We retain your contact details and our notes in our CRM system for three years after our last contact. Due to legal requirements, part of your personal data and the data included on the invoices issued will be retained in accordance with the applicable laws (for at least ten years, up to fifteen years after the last invoice is issued).

#### **Detailed Data Processing Brochure - Privacy Policy Summary**

##### **Data controller and contact details:**

**Name:** 4D Consulting Kft.

**Headquarters:** 6000 Kecskemet, Karolyi utca 6., Hungary

**Mailing address:** 6000 Kecskemet, Karolyi utca 6., Hungary

**Registering authority:** Court of Registry of the Kecskemet General Court

**Company registration number:** 03-09-135617

**Tax number:** 27509928-1-03

**Representative:** Roland Zonai

**Phone number:** +36 (30) 6500212

**Email:** [info@projexel.eu](mailto:info@projexel.eu)

**Website:** <https://www.projexel.eu>

**Bank account number:** 10700103-72414413-51100005

##### **Statement of consent for processing my personal data**

I give my voluntary and explicit consent to the processing of my data given when visiting, subscribing in, registering at, the electronic platforms of Projexel (<https://www.projexel.eu>, Facebook ads, AdWords ads), as well as given consent to process data regarding my usage of the Projexel test system required for the free trial.

By recording my details, I declare that I am older than the age of 18 years and have a full legal capacity. I represent a legal person or other organization without legal personality, and I am a mandated, authorized person to act on behalf of the person or organization represented by me and give the consent required for the management and processing of data according to this Brochure.

I declare that I provide no sensitive personal data to Projexel during registration or later in any form. Sensitive personal data shall mean, in particular, data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data, or biometric data suitable for the purpose of uniquely identifying a person; data concerning health or data concerning sex life or sexual orientation.

I declare that I do not place at the disposal of Projexel any number suitable for personal identification, including, but not limited to, passport number, personal number, identity card number, address card number, driving license number.

I declare that I will record my clients' data exclusively through the dedicated interfaces of the Projexel software. I will not email that data either to the central ([info@projexel.eu](mailto:info@projexel.eu)) or the direct email address of the Projexel staff.

I declare that I provide access to my Projexel system for the Projexel employees only through the "consultant invitation" function, I never record them as a "normal" user.

By giving my consent, I understand that Projexel can send me advertising messages, announcements, event invitations and contact me via phone calls related to the scope of its activity.

I can withdraw my consent to the processing of my data at any time by sending a request in the manner indicated in the Brochure, such as using the [info@projexel.eu](mailto:info@projexel.eu) email address.

#### **Legal ground based on a legitimate business interest**

If by filling in the form you give your data and show your interest toward the Projexel System, your application is considered as a contract preparation. In this case, a legal ground for the processing of your Personal Data under the GDPR will be the legal ground given by a legitimate business interest. This altered legal ground will not change your rights and the processing of your Personal Data, this only means that during the preparation of the contract if you do not request the termination of the process, we will continue to process your personal data to prepare the contract.

#### **Contractual legal ground in case of subscription**

If you subscribe to the Projexel System, you shall pay for our product under the terms and conditions detailed in the General Terms and Conditions. In this case, a legal ground for the processing of your Personal Data under the GDPR will be the legal ground given by the contract. This altered legal ground will not change your rights and the processing of your Personal Data, this only means that during the term of the contract if you withdraw your consent given with the use of the free version, we will continue to process your Personal Data for the performance and purpose of the contract.

As soon as the contract is performed or terminated, the legal ground for the processing of your data will change again and in what follows we will process your Personal Data according to law.

After termination or performance of the Contract, on the basis of law, regarding the details included in the invoices, we are required to continue to process your Personal Data by law.

#### **Your rights**

The following rights apply. Based on the GDPR, we have to reply to your request in connection with those at the latest within one month. We will do everything we can to react much earlier.

#### **Right to information**

You may request us to provide information about your personal data we process. You may request access to these data.

On your user profile page you can view the Personal Data you entered in your user account. At any time, you can request information in writing by sending a letter with acknowledgement of receipt to our address or by email to [info@projexel.eu](mailto:info@projexel.eu). We consider the request for information sent by letter as authentic if we can clearly identify you on the basis of the request sent. We consider the request for information sent by email as authentic only if you send it from your registered email address. However, this does not exclude the possibility of identifying you in another manner for security reasons before providing the information.

The request for information may cover the data we process, their source, the purpose, the legal basis, the duration of the processing, the names and addresses of the casual data processors, the activities related to data processing and, in the case of the transfer of Personal Data, who and for what purpose have received or are receiving your data.

#### **Right of access**

If you ask us to inform whether your Personal Data are being processed, and, where the answer is 'yes', you will be given the right to access to the purposes of the processing, the data categories, the recipients, the period for which the personal data will be stored, the data subject's rights, legal remedies, the data sources, the existence of automated decision-making and data transfer to abroad.

#### **Right to rectification**

You have the right to obtain the rectification or alteration of your Personal Data in writing at any time by sending a letter with acknowledgement of receipt to our address or by email to [info@projexel.eu](mailto:info@projexel.eu). Taking into account the purposes of the processing, you have the right to obtain completion of incomplete Personal Data.

#### **Right to be forgotten (right to deletion)**

You have the right to obtain the erasure of your Personal Data we process. The deletion of the data may be refused (i) for exercising the right of freedom of expression and information, or (ii) where Personal Data are processed for reasons of public interest (authorized by law); and where the processing occurs (iii) in an equitable private interest (for the establishment, exercise or defense of legal claims).

We will inform you in any case of the refusal of the deletion request, stating the reason for the refusal.

After performing the request for deletion of Personal Data, previous (deleted) data can no longer be recovered.

Newsletters can be canceled via the unsubscribe link they contain.

### **Right to restriction of processing**

You have the right to obtain from the controller restriction of processing if you contest the accuracy of the processed Personal Data. In this case, the restriction applies for a period that enables us to verify the accuracy of the Personal Data.

We will mark the processed Personal Data if you contest their correctness or accuracy, but the incorrectness or inaccuracy of the contested Personal Data may not be clearly ascertained.

You may also request that the processing of your Personal Data be restricted if the Data Processing is unlawful, but you oppose the deletion of the Personal Data processed and request the restriction of their use instead.

You may also use this right if the purpose of Data Processing is achieved, but you require the processing of your data for the establishment, exercise or defense of legal claims.

If you contest processing, we restrict the processing of your Personal Data pending the verification whether the legitimate grounds of the data controller override those of the data subject. Right to data portability

You have the right to receive the Personal Data, which you have provided to us and which are automatically processed by you, in a structured, commonly used and machine-readable format provided by the Projexel software (XML/XLS/CSV) and/or obtain their transfer to another data controller.

### **Right to object**

You have the right to object to processing of your Personal Data (i) where the processing of Personal Data is solely necessary to comply with our legal obligation or to enforce our legitimate interests; (ii) where the purpose of Data Processing is direct marketing, public opinion poll or scientific research; or (iii) where the Data Processing occurs for the performance of a task carried out in the public interest. We investigate the lawfulness of the objection and, if the grounds for the objection are established, we terminate the Data Processing and block the processed Personal Data, also we notify of the objection and any actions taken based thereon all persons to whom the Personal Data affected by the objection were previously transferred.

#### **1. The right to data portability**

You have the right to receive personal data concerning him or her made available to a data controller in a structured, widely used machine-readable format and to transfer this data to another data controller without being hindered by the data controller whom the personal data was provided.

#### **2. Right to protest**

You have the right to object at any time to the processing of your personal data, including profiling based on the above provisions, for reasons related to your own situation.

### 3. Protest in case of direct business acquisition

If your personal data is processed for the purpose of direct business acquisition, you have the right to object at any time to the processing of your personal data for this purpose, including profiling, insofar as it relates to direct business acquisition. If you object to the processing of personal data for the purpose of direct business acquisition, the personal data may no longer be processed for this purpose.

### 4. Automated decision making in individual cases, including profiling

You have the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effect or similar effect on him or her.

The preceding paragraph shall not apply if the decision:

- Necessary for the conclusion or performance of a contract between you and the data controller;
- Is governed by EU or Member State law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; obsession
- Based on your expressed consent.

### **Deadline for action**

The controller will inform you without undue delay, but in any case within 1 month of receipt of the request, of the action taken on the above requests. If necessary, it can be extended by 2 months. The data controller shall inform you of the extension of the deadline, indicating the reasons for the delay, within 1 month from the receipt of the request.

If the controller does not take action on your request, it will inform you without delay, but no later than one month after receipt of the request, of the reasons for the non-action and of the fact that you can lodge a complaint with a supervisory authority and have a judicial remedy.

### **GDPR Guidelines**

Under the General Data Protection Regulation ("GDPR"), if you are a resident of the European Economic Area ("EEA"), we will process your personal data on the following legal bases:

- your consent;
- fulfill the agreement between you and the Website;
- compliance with our legal obligations;
- protection of vital interests;
- carrying out a task in the public interest;
- for our legitimate interests that do not override your fundamental rights and freedoms.

### **The purpose of the processing:**

- Protecting your rights.
- Identifying you, communicating with you.
- Identifying your entitlements.

- Customizing the system and marketing messages sent to you. Ensuring targeted, relevant messages based on the area of interest, industry, company type, deciding factor and job position.
- Client support, consulting, product presentation, answering questions.
- Creating statistics, analyses and decision support. Based on this, coordinating content and product development to produce actually used functions and actually read contents.
- Software product development and safe operation.
- Creation of services, service quality and security conditions undertaken in the General Terms and Conditions.
- Compliance with our legal obligations.
- Pursuing our legitimate business interests.

### **How we handle your data**

1. is handled lawfully and fairly and in a manner that is transparent to the data subject ("legality, due process and transparency");
2. they are collected only for specified, explicit and legitimate purposes and are not treated in a way incompatible with those purposes; further processing for data purposes for archiving in the public interest, for scientific and historical research purposes or for statistical purposes ("purpose limitation") shall not be considered incompatible with the original purpose in accordance with Article 89 (1);
3. they must be appropriate, relevant and limited to what is necessary for the purposes of the processing ("data saving");
4. be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes of the processing are erased or rectified without delay ("accuracy");
5. it must be stored in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for a longer period only if the processing of personal data is carried out in accordance with Article 89 (1) for archiving in the public interest, for scientific and historical research purposes or for statistical purposes, in accordance with this Regulation; subject to the implementation of appropriate technical and organizational measures to protect its freedoms ("limited storage capacity");
6. processing must be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage to personal data ("integrity and confidentiality"), using appropriate technical or organizational measures.

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability").

### **Privacy Policy**

### **Concepts**

1. "personal data" shall mean any information relating to an identified or identifiable natural person ("data subject"); identifies a natural person who, directly or indirectly, in particular by reference to an identifier such as name, number, location, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;
2. "processing" means any operation or set of operations on personal data or files, whether automated or non-automated, such as collection, recording, systematisation, sorting, storage, transformation or alteration, consultation, consultation, use, communication, transmission or dissemination; by other means of access, coordination or interconnection, restriction, deletion or destruction;
3. "controller" means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;
4. "processor" means any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
5. "recipient" means a natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not. Public authorities that may have access to personal data in the context of an individual investigation in accordance with Union or Member State law shall not be considered as recipients; the processing of such data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;
6. "data subject's consent" means the voluntary, specific and duly informed and unambiguous expression of the will of the data subject, by which he or she indicates his or her consent to the processing of personal data concerning him or her by means of a statement or unambiguous statement;
7. "data protection incident" means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data which have been transmitted, stored or otherwise handled.

## **Data management & Data processed**

### **1.1. Collection of personal data**

When you visit the Website, we collect certain information about your device, how it interacts with the Website, and the information needed to process your purchases. We may also collect additional information by contacting customer service. In this Privacy Policy, all information that may uniquely identify an individual (including the information below) is referred to as "Personal Information". The list below provides more information about what personal information we collect and why.

#### **1.1.1. Device information**

- Examples of personal information collected: web browser version, IP address, time zone, cookie information, what websites or products you view, search terms, and interaction with the website.

- Purpose of collection: to load the Website accurately for you and to analyze the use of the Website in order to optimize our Website.
- Collection Source: Collection is done automatically when you access our Website through cookies, log files, web beacons, tags or pixels.
- Publishing for business purposes: shared with our Shopify data processor.

#### **1.1.2. Ordering information**

- Examples of personal information collected: name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number.
- Purpose of collection: to provide you with products or services to fulfill our contract, process payment information, arrange delivery, and provide invoices and / or order confirmations, communicate with you to eliminate our risks or fraud, and if this is the same as with a preference shared with us, we provide information or advertising about our products or services.
- Source of collection: We collect from you.
- Publication for business purposes: shared with our Shopify data processor and Oberlo.

#### **1.1.3. Customer service information**

- Examples of personal data collected: same as above
- Purpose of collection: to provide customer service.
- Source of collection: We collect from you.
- Publication for business purposes: Same as above

We also use this information to re-target relevant ads that are tailored to you.

#### **We process the data given by you:**

- Name
- Email
- Website
- LinkedIn/Facebook profile link
- Billing address, place of business

#### **We log the data for security reasons:**

- Viewed page/function
- Exact time
- IP address
- Browser cookie

#### **We build a profile for marketing purposes:**

- What problem do you need to find a solution to, why do you need innovation consulting?
- What are your main decision viewpoints?

The profile construction is based on the data you provide. Our goal is that the messages we send are really interesting and relevant to you. We also do not like receiving general messages that are not relevant to us.

Based on the profile data, we target and build newsletters manually with hand-made filters. There are no decisions based on automated data processing during the process.

#### **We log the calls made to us:**

- Call metadata (who-when talked with whom)
- All incoming calls to our central number are recorded after the pre-recorded message is automatically played, for quality assurance reasons (in case of complaints and randomly selected calls, managers retrospectively listen to the recordings and develop the capabilities of the client service team through coaching).

As a data processor, we store the data recorded by you in the Projexel System. The range of these data depends on the fields you create, and this is your responsibility what data you capture in those.

#### **1.2. Who do we collect data from?**

We collect the above-mentioned data from the users who register / buy at the website and subscribe to the newsletter. Of course, you can request a change to your information at any time at [info@projexel.eu](mailto:info@projexel.eu).

#### **Minors**

The Site is not intended for persons under the age of 18. We do not intentionally collect personal information from children. If you are a parent or guardian and believe that your child has provided us with personal information, please contact us at the email address provided to request cancellation. If we come to know that a child under 13 has submitted their personal information to us, we will take steps to promptly delete it. If you suspect that we have any personal information from a child under 13, please reach out to us at [info@projexel.eu](mailto:info@projexel.eu).

#### **1.3. Use of personal data**

We use your personal information to provide you with our services, which include: selling products, processing payments, shipping and fulfilling your order, and keeping you up to date with new products, services and offers.

#### **1.4. Sharing personal information**

We share your personal information with service providers to help us provide our services and fulfill our contracts with you as described above. For example:

We may share your personal information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information as necessary, or to otherwise protect our rights.

#### **1.4.1. How, and With Whom, Your Information Shared:**

The Services are designed to help you share information with others. As a result, some of the information generated through the Services is shared publicly or with third parties. The categories of third parties we may share personal information with are as follows:

Cloud Computing Services  
Data Storage Service Providers  
Payment Processors  
Performance Monitoring Tools  
Sales & Marketing Tools  
User Account Registration & Authentication Services  
Data Analytics Services  
Retargeting Platforms  
Social Networks

#### **1.4.2. Public Information about Your Activity on the Services:**

Some of your actions on the Services are visible to others by default. This can include, but is not limited to, content you have made public on the Site or Application or through other means on the Services. Users who are registered with us may have this information linked to their Accounts. Those who are not registered won't have this link, but their usage of the Services (such as what pages they visited) can still be tracked anonymously using cookies and stored by us. If you choose to share Personal Information using certain public features of the Services, that information is subject to the privacy settings of those features and may be accessible to the public. People viewing this information can share or use it with others without our control and without your knowledge, and search engines may also index it. So, we advise you to be careful when including any sensitive information in content that you create or submit through the Services.

#### **1.4.3. IP Address Information:**

While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

#### **1.4.4. User Profile Information:**

User profile information including your username and other information you enter may be displayed to other users to facilitate user interaction within the Services. We will not directly reveal user email addresses to other users.

#### **1.4.5. Financial Information:**

Projexel does not collect financial information.

### **1.5. Withholding**

When you order through the Website, we will record your personal information ("withhold") unless or until you ask us to delete that information. For more information about your right of cancellation, see the "Your Rights" section below.

## **1.6. Data sub-processors**

Server hosting services:

- Name: LittleShark Marketing Ltd.
- Address: 4034 Debrecen, Szamos street 18.
- E-mail: info@littleshark.hu
- Website: <http://www.littleshark.hu/>
- Stored data: system logs, data store.

## **Email and document management, calendar, phone contacts, table synchronization, display of targeted advertising:**

- Name: Google Ireland Limited
- Address: Gordon House, Barrow Street, Dublin 4, Ireland
- Phone: N/A
- Email: N/A
- Website: <https://www.google.com/>
- Stored data: correspondence, individual contracts and offers, calendar entries, and telephone contacts, based on data divided into filter tables, unique user IDs, and visitor identification cookies.
- Operations: email service, document management, calendar service, synchronization of phone contacts between devices, online spreadsheet manager, display of targeted advertisements (retargeting).

## **Display of targeted advertising:**

- Name: Meta Platforms Ireland Limited
- Address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
- Phone: N/A
- Email: N/A
- Website: <https://www.facebook.com/>
- Stored data: website visit data, unique user IDs, and visitor identification cookies.
- Operations: displaying targeted advertisements (retargeting).

## **Calendar, phone contacts:**

- Name: Calendly LLC
- Address: 115 E Main St Ste A1b, Buford, Georgia, 30518, United States
- Phone: +1 (800) 979-9850
- Email: N/A
- Website: <https://www.calendly.com/>
- Stored data: calendar entries, phone contacts.
- Operations: calendar service, synchronization of phone contacts between devices.

### **Accounting:**

- Name: Billingo Technologies Zrt
- Address: 1133 Budapest, Árbóc utca 6. I. emelet
- Phone: +36-1/500-9491
- Email: hello@billingo.hu
- Website: <https://www.billingo.hu/>
- Stored data: customer and seller data on the invoice, invoice items, and detailed invoice data.
- Operations: accounting, preparation of statutory reports and declarations.

### **Payment:**

- Name: Stripe Inc.  
Address: 354 Oyster Point Blvd South San Francisco, CA 94080 USA
- Phone: N/A  
E-mail: [info@stripe.com](mailto:info@stripe.com)
- Website: <https://stripe.com>
- Stored data: customer and seller data on the invoice, invoice items, and detailed invoice data.
- Operations: payment service, accounting, preparation of statutory reports and declarations.

### **Online data provision (invoicing):**

- Name: Hungarian National Tax and Customs Administration (NAV)
- Address: 1134 Budapest, Dózsa György út 128-132.
- Phone: +36 1 412 5400
- E-mail: [ebpavig@nav.gov.hu](mailto:ebpavig@nav.gov.hu)
- Website: <https://www.nav.gov.hu/>
- Stored data: customer and seller data on the invoice, invoice items, and detailed invoice data.
- Operations: online data provision from the invoicing module, data analysis, risk analysis, and official control.

### **Customer Relationship Management**

- Name: Hubspot Inc
- Address: 25 1st Street Cambridge, MA 02141 United States
- Phone: +1 857 829 5060
- E-mail: N/A
- Website: <https://www.hubspot.com>
- Stored data: correspondence, individual contracts and offers, calendar entries, and telephone contacts, unique user IDs, calendar entries, customer and seller data, invoice items, and detailed invoice data,
- Operations: calendar service, synchronization of phone contacts between devices, email service, document management, calendar service, synchronization of phone contacts

between devices, online spreadsheet manager, display of targeted advertisements (retargeting).

### **Electronic signature**

- Name: airSlate Inc.
- Address: 17 Station St 3rd Floor Brookline, MA 02445 United States
- Phone: +36 1 412 5400
- E-mail: support@airslate.com
- Website: <https://www.airslate.com/>
- Stored data: Contact details (name, email address, address, phone numbers), Job information (title, place of work), Signatures, IP addresses, other unique device identifiers and geolocation information

### **1.7. Web analytics on the website**

Please note that we use Google Analytics, Google Remarketing, AdWords conversion tracking, and Facebook Remarketing to measure the attendance of the [www.projexel.eu](http://www.projexel.eu) website and monitor visitor activity, prepare statistics, and ensure performance of your ads.

The referred programmes place so-called cookies in your browser, which store unique user identifiers. As a user of the Projexel website, you agree to the use of Google Analytics, Google Remarketing, AdWords conversion tracking, and Facebook Remarketing. You also agree to the monitoring and tracking of your activity and the use of all the services provided by the programmes.

Additionally, you have the option to disable the capture and storage of information in cookies at any time in future as described below. Please note that the settings and usage of Google Analytics, Google Remarketing, AdWords conversion tracking, and Facebook Remarketing programmes fully comply with the requirements of the Data Protection Authority.

According to Google, Google Analytics mainly uses first-party cookies to track visitors' interactions on your website. These cookies record only personally non-identifiable information. Browsers do not share their own cookies between domains. For more information on cookies, see the Google's Advertising and Privacy Policy FAQ.

### **Google Analytics**

Projexel uses Google Analytics primarily for the production of its statistics, including measuring the effectiveness of its campaigns. Using this programme, Projexel mainly gets information on how many visitors have visited its Website and how much time visitors spent on the Website. The program recognizes the visitor's IP address, so you can track whether the visitor is a returning or new visitor. Also, it can track where the visitor is coming from and where he/she enters the Website.

## **Google Remarketing**

With the Google Remarketing programme, Projexel collects DoubleClick cookie data in addition to the usual Google Analytics data. The DoubleClick cookie allows you to use the remarketing feature that primarily ensures that the Projexel Website visitors can later see the Projexel ad on free Google ad surfaces. Projexel uses Google Remarketing for your online ads. The Projexel ads are also displayed on external service providers' websites, such as Google. Projexel and external service providers such as Google use their own cookies (such as Google Analytics cookies) and third-party cookies (such as DoubleClick cookie) to collect users' past visits to the Website for orientation and for optimizing and displaying ads.

## **Google AdWords conversion tracking**

Google AdWords conversion tracking is designed to enable Projexel to measure the effectiveness of AdWords ads. This is done using cookies placed on the User's computer, which exist for 30 days.

## **Facebook Remarketing**

Projexel uses Facebook's remarketing pixel to increase the efficiency of Facebook ads, to build a so-called remarketing list. So, after visiting the Website, you can show ads on external service providers websites, such as Facebook. Remarketing lists are not suitable for personal identification. They do not contain visitor's personal information, only the browser software is identified.

## **Behavioral advertising**

As described above, we use your personal information to provide you with targeted advertising or marketing communications that we believe may be of interest to you. For example:

- Google Analytics helps us understand how our customers use the Website. Learn more about Google's use of your personal information at [https://policies.google.com/privacy?hl=en\\_US](https://policies.google.com/privacy?hl=en_US). You can also unsubscribe from Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
- We share information about your use of the Site, purchases, and interactions with our ads on other sites with our advertising partners. We collect and share some of this information directly with our advertising partners, in some cases using cookies or other similar technologies (to which you may consent, depending on your location). To learn more about how targeted advertising works, visit the Network Advertising Initiative ("NAI") training page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

## **Here's how to unsubscribe from targeted ads:**

- FACEBOOK - <https://www.facebook.com/settings/?tab=ads>
- GOOGLE - <https://www.google.com/settings/ads/anonymous>
- BING - <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

You can also disable these services by visiting the Digital Advertising Alliance Blocking Portal: <http://optout.aboutads.info/>.

### **Google Adwords**

An online advertising program called "Google AdWords" is used by the data controller and uses Google's conversion tracking service. Google Conversion Tracking is an analytics service provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA; "Google").

When a User accesses a website through a Google ad, a conversion tracking cookie is placed on their computer. These cookies have a limited validity and do not contain any personal data, so the User cannot be identified by them.

When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller may see that the User has clicked on the advertisement.

Each Google AdWords customer receives a different cookie, so they cannot be tracked through AdWords customers' websites.

The information obtained through conversion tracking cookies is used to generate conversion statistics for customers who choose AdWords conversion tracking. This is how customers find out the number of users who clicked on your ad and were redirected to a page with a conversion tracking tag. However, they do not have access to information that could identify any user.

If you do not wish to participate in conversion tracking, you can opt out by disabling the ability to set cookies in your browser. You will then not be included in your conversion tracking statistics.

More information and Google's privacy statement can be found at [google.de/policies/privacy/](http://google.de/policies/privacy/)

### **Automatic decision making**

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling) when the decision-making has legal effects on you or otherwise significantly affects you.

We do not engage in fully automated decision making that has a significant legal or other impact on the use of customer data. Our data processor uses limited automated decision making to prevent fraud that has no legal or other significant impact on you.

Services that include elements of automated decision making include:

- Temporary blacklisting of IP addresses associated with repeated failed transactions. This ban list will last for a few hours.
- Temporary blacklisting of credit cards associated with blocked IP addresses. This ban list will last for a few days.

## **2. Management of cookies**

A cookie is a small amount of information that is downloaded to your computer or device when you visit our Website. We use a variety of cookies, including functional, performance, advertising, and social media or content cookies. Cookies improve the browsing experience by allowing the website to remember your activities and preferences (such as login and region selection). This means you don't have to re-enter this information when you return to the site or browse from one page to another. Cookies also provide information about how people use the website, such as whether they are visiting for the first time or how often they are visiting. We use the following cookies to optimize your experience on our website and to provide our services.

### **2.1. Cookies Necessary for the Functioning of the Store**

Strictly Necessary cookies

Name	Provider / Domain	Expiration	Description
CookieScriptConsent	<a href="#">CookieScript</a> <a href="#">projexel.eu</a>	1 month	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.
PHPSESSID	<a href="#">PHP.net</a> <a href="#">projexel.eu</a>	Session	Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. It is normally a random generated number, how it is used can be specific to the site, but a good example is maintaining a logged-in status for a user between pages.

## Performance cookies

Name	Provider / Domain	Expiration	Description
_ga	<a href="#">Google LLC</a> .projexel.eu	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.
_ga_FVB1MJ F40G	.projexel.eu	1 year 1 month	This cookie is used by Google Analytics to persist session state.

### **2.2. Disable cookies**

If you want to manage or disable cookie settings, you can do so in your browser. This option can be found in the cookies/ tracking features placement menu depending on the browser toolbar. Usually, you can use the Tools > Preferences > Privacy settings to set which tracking features you enable/disable on your computer.

If you do not want Google Analytics to report on your visits, you can install the Google Analytics opt-out browser add-on. The add-on prevents the scripts of the Google Analytics JavaScript from sharing information with Google about visit activity. If you've installed the opt-out browser add-on, you will not be involved in content experiments.

### **2.3. Reporting and Analytics**

The duration of cookies on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies last until you stop browsing, and persistent cookies last until they expire or are deleted. Most of the cookies we use are permanent in nature and expire between 30 minutes and two years from the time they are downloaded to your device.

You can control and manage cookies in different ways. Please note that removing or blocking cookies may adversely affect your user experience and parts of our site may no longer be fully accessible.

Most browsers automatically accept cookies, but you can also choose whether or not to accept cookies through the browser interface, which is often found in your browser's "Tools" or "Settings" menu. For more information on changing your browser settings or blocking, managing or filtering cookies, see your browser's help file or visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Also, please note that disabling cookies may not completely prevent us from sharing information with third parties, such as our advertising partners. Follow the instructions in the "Behavioral Advertising" section above to exercise your rights or waive certain uses by those affected.

To disable Google Analytics web activity, visit the Google Analytics opt-out page and install the add-on for your browser. For more information about installing and removing the add-on, see the help for that browser.

The fact of data management, the scope of data managed: Unique identification number, dates, times

Stakeholders: All stakeholders who visit the website.

The purpose of data management is to identify users, record a "shopping cart" and track visitors.

Duration of data management, deadline for deleting data: When deleting a registration or if requested by the customer.

Identity of potential data controllers entitled to access the data: The data controller does not process personal data using cookies.

Description of the data subjects' rights related to data management: The data subject has the possibility to delete cookies in the Tools / Settings menu of the browser, usually under the settings of the Privacy menu.

Legal basis for data processing: The data subject's consent is not required if the sole purpose of the use of cookies is the transmission of communications via an electronic communications network or the provision of an information society service specifically requested by the subscriber or user.

#### **2.4. Do Not Track**

Please note that because the industry does not uniformly recognize "Do Not Follow" signs, we will not change our data collection and usage practices when we detect such a sign from a browser.

### **3. Principles of data processing**

- The Data Controller manages the Personal Data by the principles in good faith, fairness, and transparency, as well as the applicable legislation and the provisions of this Brochure.
- The Data Controller uses the Personal Data that are indispensable for the use of the Services by the consent of the User concerned and solely in compliance with the purpose limitation.
- The Data Controller processes Personal Data only for the purpose specified in this Brochure and the relevant legislation. The scope of the Personal Data processed is proportionate to the purpose of data processing and cannot be expanded (data minimization).
- The Personal Data of a person who has not reached the age of 18 is not processed by Projexel as a business software provider.
- The Data Controller does not transfer the Personal Data it processes to any third parties other than the Data Processors specified in the present Brochure, and, in some cases referred to in this Brochure, the External Service Providers. Except as provided in this clause, the use of the data in a statistically aggregated form, that cannot contain any other data suitable for identifying the User concerned, shall not constitute Data Processing or data transfer.
- In certain cases, including official court or police inquiries, legal proceedings against copyright, property or other breaches, or their reasonable suspicion, the violation of Data Controller's rights, the jeopardizing of the provision of Services, etc., the Data Controller makes accessible to third parties the available Personal Data of the User concerned.
- The Data Controller's System may collect data on the activity of Users that cannot be combined with other data provided by Users during registration, nor with any other data generated by the use of other websites or services.
- The Data Controller is responsible for the rectification, limitation or deletion of the Personal Data it processes and on notifying the affected User, and those to whom the Personal Data were previously transferred for the Data Processing
- Notification is not required if it does not violate the rightful interest of the data subject in light of the purpose of Data Processing.
- The Data Controller ensures the security of Personal Data, takes the technical and organizational measures and establishes the procedural rules that ensure that the recorded, stored, or processed data are protected or prevented from being accidentally lost, or unlawfully destructed, accessed to, used, altered or disclosed. The Data Controller requests all third parties to whom Personal Data is transmitted to comply with this obligation.
- Given the relevant provisions of the GDPR, the Data Controller is not obliged to designate a Data Protection Officer.
- The Data Controller is responsible for compliance with the principles.

### **3.1. Confidential data processing**

Projexel processes recorded data confidentially doing everything to ensure the security of the data and uses them to ensure the proper functioning of the Website. This includes, inter alia, sending email and SMS to you and the contact details you provided, in which case the message will be sent through that service provider.

Projexel will never sell or loan your personal information to a third party for marketing purposes. By a summons, court decision or in the context of civil proceedings, Projexel may, if necessary, transfer your personal data and other relevant information.

Also, Projexel can assure or exercise its statutory rights and defend itself against legal actions. For the safe processing of data, Projexel selects the IT tools used to process the data so that, during the operation, the data processed can be accessed only by Projexel as authorized for this purpose, the data credibility be preserved, no alteration of the recorded data occur outside the recording procedure, the recorded data be protected from unlawful access.

The data processed by Projexel may be transferred when requested by an authority or court, or by law, whereas Projexel will notify its users of this fact in its newsletter if this is not in conflict with the official or court request, or the related legal requirement.

#### **Access of our staff to personal data**

For our staff, we only provide the access to strictly necessary to work with the personal data processed by us. We log every access, and we ensure only strictly restricted access to the data saver feature.

Our salespersons, consultants, client support staff and developers do not even see the personal data recorded in your own Projexel system. If you provide access to your system to our colleague through the “Call a Consultant” feature, he or she will only see your settings, not your data.

If because of integration development or debugging we reload the system to a test or development environment, it can only retrieve data through such a channel where data in a production environment are destroyed during the backup. Thus, in test and development environments, randomly generated characters can be found in the place of personal data (e.g., name, email, phone number, address) in the system.

Data backups are made using two-key encryption. Thus, even the employees who have access to the data backup file do not access the saved data in the absence of an “offline stored” key required for decoding.

Only the narrowest group of people required to operate production servers has access to the servers with live data. Every access is strictly logged after three-factor authentication: VPN key, SSH key, user password.

### **3.2. How long do we store it?**

We will store your data in our system for the duration of the deletion of your registration (unless otherwise requested by you to change or delete your data) in order to facilitate the user experience.

Retention of inactive accounts: 12 months

Retention of pending orders: 20 months

Retention of defective orders: 150 days

Retention of canceled orders: 150 days

Retention of completed orders: 20 months

Information about the visit to the website. Data managed: IP address, time and duration of the visit, list of visited subpages, operating system you are using, browser type, screen resolution.

Duration: 2 years

Registration information. Data managed: First name, e-mail address. Duration: Until cancellation of registration / withdrawal of consent

Newsletter (direct marketing) service data. Data managed: First name, e-mail address. Duration: Until unsubscribed / withdrawn

Purchase of a product or service. Data handled: Customer's last name, first name, e-mail address, telephone number, billing address, customer's note, mobile number for sending the electronic invoice, contacting the customer, and forwarding to the Dropshipping partners the delivery address provided by the customer for home delivery. Duration: 8 years (from the last day of the order year)

### **3.3. Who can handle the data?**

Personal data may be processed by the sales and marketing staff of the data controller, respecting the above principles.

## **4. Data management rights**

### **4.1. Description**

- The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and
- object to the processing of such personal data, and
- the data subject has the right to data portability and to withdraw his or her consent at any time.

### **4.2. Contact details of the data controller**

You can request the deletion, modification or access of your personal data here:

Email: [info@projexel.eu](mailto:info@projexel.eu)

#### **4.3. Legal basis for data management**

- Article 6 (1) (b) of the GDPR,
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services. Act (hereinafter: Elker Act) 13 / A. § (3):

The service provider may process personal data that is technically necessary for the provision of the service in order to provide the service. If the other conditions are the same, the service provider must choose and in all cases operate the means used in the provision of the information society service in such a way that personal data is processed only if it is necessary for the provision of the service and other purposes specified in this Act. necessary, but in this case only to the extent and for the time necessary.

- Article 6 (1) (c) if an invoice is issued in accordance with accounting legislation.
- In the case of enforcement of claims arising from the contract, Act V of 2013 on the Civil Code 6:21. § 5 years.

#### **6:22. § [Limitation]**

- (1) Unless otherwise provided by this Act, claims shall lapse within five years.
- (2) The limitation period shall begin when the claim becomes due.
- (3) An agreement to change the limitation period shall be in writing.
4. An agreement precluding limitation shall be null and void.

We inform you that

- Data management is necessary for the performance of the contract.
- Is required to provide personal information so that we can fulfill your order.
- Failure to provide information will result in the inability to process your order.

#### **5. Data security**

Data security is a complex issue in case of systems processing sensitive business data. Internal rules and processes of Projexel ensure that data security and privacy requirements are met in all areas:

- Data security
- Network security
- Data separation
- Contact
- Data backup, disaster prevention
- Identification and access control
- Security-conscious software development

All data stored in the Projexel System are stored physically in the territory of the European Union or a country that GDPR considers equivalent in the context of privacy and are subject to the EU privacy directives.

When external integrations are turned on (e.g., Google Calendar), the data concerned may get outside the EU territory, so when turning on these integrations, the system will require prior consent from users.

### **5.1. Technology**

Projexel regularly updates all applied software for the protection from known platform attacks at all levels (Tools used by employees, Server operating system, Virtualization layer, Guest operating system, application).

Our servers are located in one of Europe's most secure data centers (Dataplex/Magyar Telekom). We use a redundant and scalable infrastructure that does not have any point/device which failure would cause a loss of service.

Encrypted data backups are made automatically on a daily basis and transferred to other data centers to ensure data recovery in case of a disaster.

We adopt accepted industry solutions such as the Open Web Application Security Project (OWASP) and the Cloud Security Alliance Cloud Controls Matrix (CCM).

### **5.2. Access protection**

Physical access to infrastructure is very limited. In each case, proper identification is required. Since its inception, the Projexel System has been built as a multi-user service; the entire platform and infrastructure provide logical separation of data. The use of external identification services (Single-Sign-On) is supported (Google Account, OpenID).

### **5.3. Network security**

Multiple level firewall protection separates data storage servers from the outside world. Internet connectivity is provided only by dedicated load balancing servers. Application servers and data storage servers operate in internal network separated from each other, a connection between them is provided via an intermediate firewall/load balancing layer.

Production/test/integration test/development environment operate in a separate network. Multilevel intrusion attack alert and phishing attack alert protect the stored data. Unused services, protocols, and software become removed. All our servers are built on a minimal basis; only the required software is installed.

We control the effectiveness of our processes and internal rules by external security audits.

### **5.4. Availability**

The availability of business applications is critical. Our infrastructure, built with dozens of quality servers, ensures that the failure of any component does not lead to a complete service failure.

Container-based architecture is not only conducive to security; individual services can be automatically migrated between servers, providing continuous availability and balancing the different loads of different periods.

The Projexel contract guarantees at least 99.9% availability. The planned availability of the infrastructure used is 99.99% per month. Independent external monitoring service measures the availability between 99.98% and 99.99% on a monthly basis, including any downtime during pre-announced night-time maintenance as a service failure.

### **5.5. Data backup and disaster prevention**

All data recorded in the Projexel System is mirrored on multiple media and multiple servers in almost real-time. Distributed, redundant data storage ensures that failure of any of the hardware devices does not lead to data loss.

Automatic data backup is made daily and transferred in encrypted form to a data center outside of Hungary.

Every day backup is automatically tested. Databases are loaded from backup to the dedicated server, and a thorough, multi-step process runs through restored systems. The testing system collects the logs and analyzes the expected test results. It sends a daily report to the operating team.

Identification and access control

All and any access is only possible through specified user accounts to ensure traceability.

Strong passwords protect user accounts, the rules found in the app provides password strengths. Each password is stored as a highly encrypted, one-way “salted” hash value.

The users with administrator privileges can manage user accounts in the client system.

Accounts are protected against incorrect password attempts by an automated blocking system that locks out the IP address and user account after several incorrect attempts.

### **5.6. Two-factor identification**

Users can turn on two-factor authentication. In this case, after login with a valid email address and a password from a new device, the Projexel System will ask for an additional security code. This can be either SMS or TOTP (Google Authenticator) code.

Security-conscious software development

Security is not only a subsequent idea; it is an integral part of our development processes. New developers are engaged in detailed training to understand data security and privacy issues adequately.

There are several layers of application design, and the platform has built-in protection against the most commonly encountered attack interfaces/modes.

After each change, automatically running tests, automated integration tests, and static code analysis tools monitor the quality.

Security-sensitive code parts are monitored separately, and changes to these parts can be added to the next version after compulsory code review.

### **5.7. Reliability**

In addition to data security and availability, it is of utmost importance that users rely on the solution as a registration system. Based both on objective and subjective considerations.

A Registration System is required to be a credible source of the data elements and information it processes. It should be possible to track what, by whom and when was recorded, modified or placed in the recycle bin.

The rules determined in the development stage ensure the validity of the data and the integrity of the relationships between interrelated data.

### **5.8. Up-to-date technology**

Without a separate upgrade/follow-up/development fee, we always provide a system supporting current technologies.

We continuously update not only the software running on our servers but also the “building blocks” of the framework system seen by the users. This way, we ensure that once delivered solutions will work for many years with the then current browser/notebook/mobile device combinations.

### **5.9. Automatically scales itself**

The Projexel System is fast not just at launch, but with a dozen users and some thousand records. As the data accumulates and the number of users increases, the platform automatically allocates more resources to meet the needs.

### **5.10. Security of data management**

The controller and the processor shall take appropriate technical and organizational measures to take account of the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of the processing and the varying likelihood and severity of the risk to individuals' rights and freedoms. to guarantee a level of data security appropriate to the degree of risk, including, *inter alia*, where appropriate:

1. pseudonymisation and encryption of personal data;
2. ensuring the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
3. in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;

4. a procedure for regular testing, assessment and evaluation of the effectiveness of the technical and organizational measures taken to ensure the security of data processing.

## **6. Informing the data subject about the data protection incident**

If the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject of the data protection incident without undue delay.

The information provided to the data subject shall clearly and intelligibly describe the nature of the data protection incident and the name and contact details of the data protection officer or other contact person who provided further information; the likely consequences of the data protection incident must be described; describe the measures taken or planned by the controller to remedy the data protection incident, including, where appropriate, measures to mitigate any adverse consequences arising from the data protection incident.

The data subject need not be informed if any of the following conditions is met:

- the controller has implemented appropriate technical and organizational protection measures and these measures have been applied to the data affected by the data protection incident, in particular measures such as the use of encryption which make the data incomprehensible to persons not authorized to access the personal data;
- the controller has taken further measures following the data protection incident to ensure that the high risk to the data subject's rights and freedoms is no longer likely to materialize;
- information would require a disproportionate effort. In such cases, the data subject shall be informed through publicly available information or a similar measure shall be taken to ensure that the data subject is informed in an equally effective manner.

If the data controller has not yet notified the data subject of the data protection incident, the supervisory authority may, after considering whether the data protection incident is likely to involve a high risk, order that the data subject be informed.

### **6.1. Report a privacy incident to the authority**

The data protection incident shall be reported by the controller to the supervisory authority competent under Article 55 without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is not likely to jeopardize the rights of individuals. and its freedoms. If the notification is not made within 72 hours, the reasons for the delay must be provided.

### **6.2. Possibility to complain**

Complaints against possible breaches of the data controller can be lodged with the National Data Protection and Freedom of Information Authority:

National Data Protection and Freedom of Information Authority  
1125 Budapest, Szilágyi Erzsébet avenue 22 / C.  
Mailing address: 1530 Budapest, Mailbox: 5.

Phone: +36 -1-391-1400  
Fax: + 36-1-391-1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## **7. Your rights: GDPR and CCPA**

### **7.1. GDPR**

If you are in the EEA, you have the right to access the personal data we hold about you, to redirect it to a new service and to request that your personal data be corrected, updated or deleted. If you would like to exercise these rights, please contact us at the contact details provided.

Your personal data will initially be processed in Ireland and then transferred outside Europe, including Canada and the United States, for storage and further processing. For more information on how data transfer complies with GDPR.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. [Click here to learn more.](#)

Performance of a Contract. We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

- Send users information about special offers and discounts on our products and services
- Develop and display personalized and relevant advertising content for our users
- Analyze how our Services are used so we can improve them to engage and retain users
- Support our marketing activities
- Diagnose problems and/or prevent fraudulent activities
- Understand how our users use our products and services so we can improve user experience

Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or

regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

## **7.2. CCPA**

If you reside in California, you have the right to access personal information stored about us (also known as the “Right to Know”), to transfer it to a new service, and to request that your personal information be corrected, updated or deleted. If you would like to exercise these rights, please contact us through the contact details provided.

If you would like to nominate an authorized agent to submit these requests on your behalf, please contact us at the address provided.

## **Users Outside of the EU**

By using the Services as a non-EU user, you understand and agree that your personal information may be processed for the reasons outlined in this Privacy Policy. Your data may also be processed in the country where it was obtained and other countries, including the member countries of the EU, where the laws for handling personal information might not be as strict as the laws in your own country. By submitting your information, you give your consent for such transfers to occur.

## **8. Data processor used for online payment**

When paying online, payment is made via a secure SSL connection. We take great care to provide a sufficiently secure and manageable payment interface. The General Terms and Conditions shall govern the detailed description of the payment options. Projexel uses external payment service providers to process credit card payments, unless otherwise indicated.

Typically, users are required to directly provide their payment information and personal details to these payment service providers, not Projexel. Projexel only receives notification of successful payment from the payment service provider, and is not involved in the collection or processing of such information. The payment processors have responsibility for handling your personal information and may use it for their own purposes, subject to their privacy policies.

### **8.1. Payment methods:**

- Payment by credit card: Stripe

More information about the data controller in case of credit card payment:  
Stripe Inc.

Head office: 510 Townsend Street San Francisco, CA 94103, USA  
Contact: <https://support.stripe.com/contact/>

## **8.2. The operator of the billing program as a data controller:**

Billingo Technologies Zrt. Is the operator of the Service Provider's invoicing program.

Name: Billingo Technologies Zrt.

Headquarters: 1133 Budapest, Árbóc utca 6. III. floor

Company registration number: 01-10-140802, registered by the Registry Court of the Metropolitan Court

Tax number: 27926309-2-41

Phone number: + 36-1 / 500-9491

E-mail: Billingo - Customer service business@billingo.hu

The scope of the transmitted data: billing address, e-mail address for sending the electronic invoice.

The purpose of the data transfer is to create and send an electronic invoice to the customer.

## **8.3. Other data processors in use**

### **Communication services**

This type of service has the purpose of capturing User's online meetings and conversations subject to Projexel's Services.

### **Managing contacts and sending messages**

This type of service allows for the management of a database containing the User's email, phone, or other contact information for communication purposes. It may also gather data on the time the User viewed and interacted with the message, including clicks on links in the message.

Hubspot (Hubspot, Inc.)

Hubspot is an online marketing platform.

Personal Data processed: name, email address.

Place of processing: United States

Privacy Policy supported by Data Protection Addendum including Standard Contractual Clauses (<https://legal.hubspot.com/dpa>)

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Usage Data.

Place of processing: United States

Privacy Policy supported by Data Protection Addendum including Standard Contractual Clauses (SCCs) ( <https://privacy.google.com/businesses/compliance/>)

### **User database management**

This type of service enables Projexel to construct user profiles using the email address, name, or other information provided by the User, as well as monitor User behavior through analytical features. This Personal Data may also be linked to publicly available information about the User

(such as social media profiles) to create private profiles that Projexel can use and display to improve its performance. Some of these services may also allow for timed messaging to the User, such as emails triggered by specific actions taken on Projexel.

**Hubspot Customer Relationship Management (CRM)**

Hubspot is a User database management service.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States

Policy: Data Processing Agreement. (<https://legal.hubspot.com/dpa>)

### **Duration of data processing**

In compliance with the requirements of GDPR, we process your data with a predetermined limitation period for each group of data processed.

As a rule of thumb, detailed security logs are stored for 90 days; other security logs are stored for 365 days.

Personal data are stored for 365 days after the last contact unless a statutory requirement or a contract requires a more extended period.

For a detailed description of each data group, purposes of data processing, and retention times see "Our Services".

### **Data transfer**

We are entitled and required to transfer any Personal Data that is available to us and lawfully stored by us, to the competent authorities, where a legal rule or a final official order compels us to transfer this Personal Data. The Data Controllers cannot be held responsible for such data transfer and the resulting consequences.

If we transfer the operation or utilization of our service to a third party in whole or in part, we may transfer, in whole or in part, the Personal Data we have processed to the new operator without requesting your specific consent for this third party, however having properly informed you in advance, so that this data transfer shall not put you in a disadvantageous situation as regards the data processing rules indicated in the then current text of this Brochure. In the case of data transfer under this paragraph, before the data is transferred, we ensure a possibility for you to object to the data transfer before the data transfer. In case of objection, the transfer of your data according to this Section is not possible.

With a view to verifying the lawfulness of data transfer and for the information of the data subject, the data controller shall maintain a data transfer log, showing the date of transfer, the legal basis and the recipient of transfer, the description of the personal data transferred, as well as other information prescribed by the relevant legislation on data processing.

## **9. Location of physical storage of data**

Your personal data (i.e. the data that can be contacted with you) may be processed by us in the following ways: on the other hand, you may also provide your name, contact information or other details if you wish to contact us in person when using the website.

Data to be technically recorded during the operation of the system: the data of the login computer of the person concerned, which is generated during the voting and which is recorded by the system of the ecommerce website as an automatic result of the technical processes. The data that is automatically recorded is automatically logged at entry and exit without a separate statement or action by the data subject. This data may not be combined with other personal user data, except in cases required by law. Only the service provider's manager has access to the data.

The Data Controller stores all personal data in the high security cloud systems of the Data Processors listed above. Our company does its best to check the data management of the Data Processors related to it and to request information in this regard.

This means that we do not store any personal data on our own computers, mobile phones or mobile media. So we have greatly reduced the risk of data loss or theft for you. We use extremely strong passwords on our machines, as well as up-to-date strong anti-virus software.

### **Updating the Brochure, Tracking Legal Changes**

The data controller continuously reviews and updates the Brochure by changes in the legal environment and the official expectations. The User may continuously obtain information about the current Brochure in the "Data Processing Brochure" section on the Projexel website.

## **10. Newsletter, DM activity**

The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and may object to the processing of such personal data, and the data subject has the right to data portability and withdrawal of consent at any time.

Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activity. Pursuant to Section 6 of the Act, the User may consent in advance and expressly to contact the Service Provider with his advertising offers and other items at the contact details provided during registration.

Furthermore, keeping in mind the provisions of this prospectus, the Customer may consent to the Service Provider handling the personal data necessary for sending advertising offers.

The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from sending offers free of charge without restriction or justification. In this case, the Service Provider deletes all personal data - necessary for sending advertising messages -

from its register and does not contact the User with its further advertising offers. The user can unsubscribe from the ads by clicking on the link in the message.

### **11. Fact of data collection, scope of data processed and purpose of data management:**

Personal data	The purpose of data management
Name, e-mail address.	Identification, allowing you to subscribe to the newsletter.
Date of subscription	Perform a technical operation.
IP address at the time of subscription	Perform a technical operation.

Stakeholders: All stakeholders who subscribe to the newsletter.

The purpose of data management: to send electronic messages containing advertising (e-mail, sms, push message) to the data subject, to provide information about current information, products, promotions, new features, etc.

Duration of data management, deadline for deleting data: data management lasts until the withdrawal of the consent statement, i.e. until unsubscription.

Registration number of the data management: in progress...

Identity of potential data controllers entitled to access the data, recipients of personal data: Personal data may be processed by the data controller's sales and marketing staff, respecting the above principles.

Access to, deletion, modification or restriction of the processing of personal data, portability of data and protest against data processing can be initiated by the data subject in the following ways:

- by email to [info@projexel.eu](mailto:info@projexel.eu)
- under the GDPR Compliance subpage

The person concerned can unsubscribe from the newsletter at any time, free of charge.

Legal basis for data processing: consent of the data subject, Article 6 (1) (a) and (f), and Act XLVIII of 2008 on the basic conditions and certain restrictions on commercial advertising.

Section 6 (5) of the Act:

The advertiser, the advertising service provider or the publisher of the advertisement shall keep records of the personal data of the persons who have made a statement to them, within the scope specified in the consent. The data contained in this register relating to the recipient of the advertisement may be processed only in accordance with the statement of consent, until it is withdrawn, and may be disclosed to third parties only with the prior consent of the person concerned.

We would like to inform you that:

- during data management with your consent:
- you are required to provide personal information if you wish to receive a newsletter from us.
- Failure to provide information will result in us not being able to send you a newsletter.

## **12. Complaint handling**

Fact of data collection, scope of data processed and purpose of data management:

Personal data	The goal of data handling
Surname and first name	Identification, contact.
Email Address	Contact.
Phone number	Contact.
Billing name and address	Identification, handling of quality objections, questions and problems related to the ordered products.

Stakeholders: All stakeholders who buy on the ecommerce website and make a quality complaint.

Duration of data processing, deadline for erasure of data: Copies of the record, transcript and response to the objection entered in the CLV Act 1997 on Consumer Protection. Act 17 / A. § (7) shall be kept for 5 years.

Identity of potential data controllers entitled to access the data, recipients of personal data: Personal data may be processed by the data controller's sales and marketing staff, respecting the above principles.

Description of data subjects' rights in relation to data processing:

- The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and
- object to the processing of such personal data, and
- the data subject has the right to data portability and to withdraw his or her consent at any time.

Access to, deletion, modification or restriction of the processing of personal data, portability of data and protest against data processing can be initiated by the data subject in the following ways:

- e-mail: [info@projexel.eu](mailto:info@projexel.eu)

Legal basis for data processing: Article 6 (1) (c) and CLV 1997 on consumer protection. Act 17 / A. § (7).

We would like to inform you that:

- the provision of your personal data on a contractual basis
- the processing of personal data is a precondition for concluding a contract.
- is required to provide personal information so that we can handle your complaint.
- Failure to provide information has the consequence that we are unable to handle your complaint.

### **13. Social sites**

The fact of data collection, the scope of managed data:

Facebook / Google + / Twitter / LinkedIn / Instagram / Pinterest / TikTok / YouTube etc. registered name on social networking sites and the user's public profile picture.

Stakeholders: All stakeholders who have registered on Facebook / Google + / Twitter / LinkedIn / Instagram / Pinterest / TikTok / YouTube, etc. social networking sites and "liked" the website.

The purpose of data collection: To share or "like" certain social elements, products, promotions or the website itself on social networking sites.

Duration of data processing: Deadline for deleting data, identity of potential data controllers entitled to access the data and description of data subjects' rights related to data processing: The data subject can find out about the source of the data, its processing and the method and legal basis Data management is carried out on social networking sites, so the duration and method of data management, as well as the possibilities of deleting and modifying data are subject to the regulation of the given social networking site.

Legal basis for data processing: the voluntary consent of the data subject to the processing of his or her personal data on social networking sites.

### **14. Customer Relationships and Other Data Management**

1. If the data controller has any questions or problems during the use of our data controller services, he / she may contact the data controller in the ways provided on the website (telephone, e-mail, social networking sites, etc.).
2. Data controller for incoming e-mails, messages, phone, Facebook, etc. will delete the data provided together with the name and e-mail address of the interested party, as well as other personal data voluntarily provided, no later than 2 years after the communication.
3. We provide information on data processing not listed in this prospectus at the time of data collection.
4. Upon an exceptional official request, or in case of requesting other bodies based on the authorization of legislation, the Service Provider is obliged to provide information, communicate and hand over data, or make documents available.
5. In these cases, the Service Provider shall provide the requester with personal data only to the extent and to the extent that is absolutely necessary for the realization of the purpose of the request, provided that it has indicated the exact purpose and scope of the data.

## **15. Concluding remarks**

During the preparation of the prospectus, we took into account the following legislation:

- REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (Regulation (EU) No 2016/679) of the European Parliament and of the Council of April 27)
- Annual CXII. Act - on the right to information self-determination and freedom of information (hereinafter: Infotv.)
- annual CVIII. Act - on certain issues of electronic commerce services and services related to the information society (mainly Section 13 / A)
- year XLVII. Act on the Prohibition of Unfair Commercial Practices against Consumers;
- year XLVIII. Act - on the basic conditions and certain restrictions of commercial advertising (especially § 6)
- year XC. Electronic Freedom of Information Act
- Act C of 2006 on electronic communications (specifically § 155)
- 16/2011. s. Opinion on the EASA / IAB Recommendation on Best Practices for Behavioral Online Advertising
- Recommendation of the National Authority for Data Protection and Freedom of Information on data protection requirements for prior information
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46

## **16. More questions/answers**

You can always get information about data management and/or processing by sending an email to [info@projexel.eu](mailto:info@projexel.eu)

You can turn with your complaints concerning data processing directly to the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Erzsébet Szilágyi fasor 22/c, Hungary; phone: +36-1-391-1400; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

In the event of a violation of your rights, you may turn to court. The action shall be heard by the general court. If so requested by the data subject, the action may be brought before the general court in whose jurisdiction the data subject's home address or temporary residence is located. At your request, we will inform you about the possibilities and means of judicial remedy.

## **17. Changes**

We may from time to time update this Privacy Policy to reflect, for example, changes in our practices and other operational, legal or regulatory reasons.

## **18. Contact**

If you need more information about our privacy practices, if you have any questions or complaints, please contact us by email at [info@projexel.eu](mailto:info@projexel.eu) or by mail at the following address:

4D Consulting Kft., Károlyi utca 6., Kecskemét, 6000, Hungary

If you are not satisfied with our response to your complaint, you have the right to submit your complaint to the competent data protection authority. You can contact your local data protection authority or supervisory authority here: <https://naih.hu/online-ugyinditas>

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