

# Data Protection and Handling Policy Data Protection and Data Management Policy

**Changes**

Version	Date	Changes
1.0	24.05.2018.	Original version

These regulations

you (as an individual or a business organization) as the Customer using the services / hereinafter: the **Customer** prepared for

**10xONE Magyarország Zrt..**

(1021 Budapest, Budakeszi út 5., tax number: 24261106-2-41, company registration number) has been 01-09-872976) as a **Service Provider** (hereinafter: Service Provider)

**Data Protection Officer:** Andor Pribék

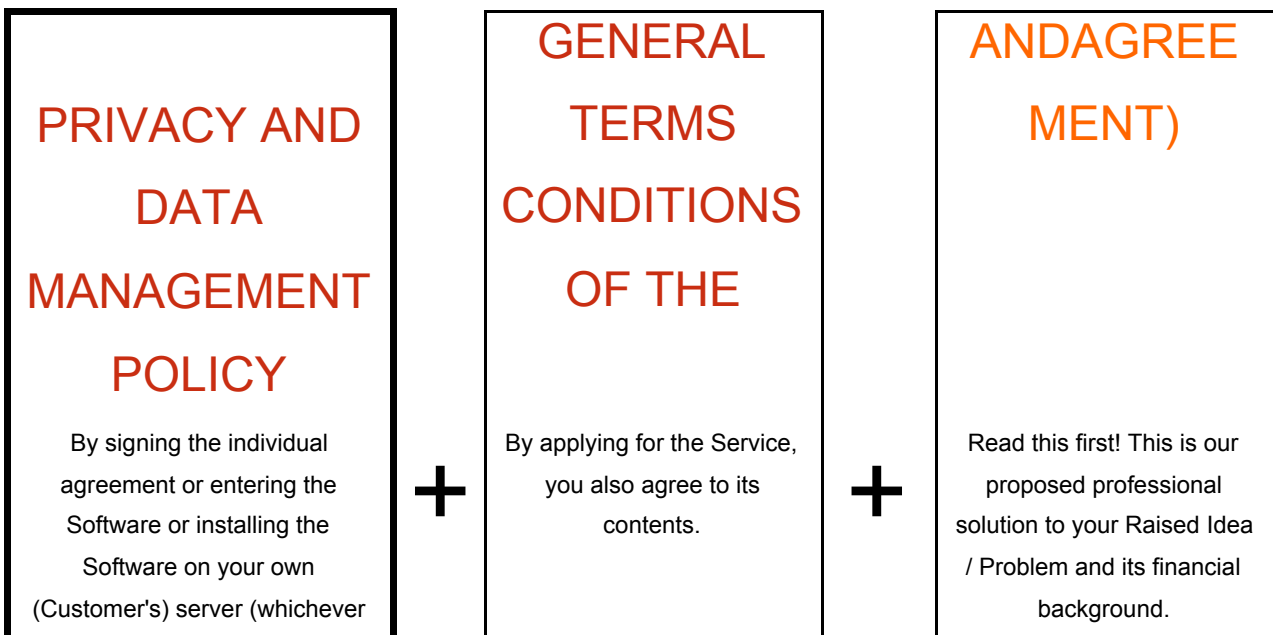
**Subject and structure of the regulation Subject of the**

contract Software provision given in the finalized Offer / Individual Contract given by the Service Provider to the Customer and specified jointly by the Parties, and

- According to table "Offer / Contract - Main parameters of the contract - Software"
- the "Services" as indicated in the "Offer / Contract - Software Implementation Services" table, as well as
- the "Offer / Contract - Support and Tracking Services" table and
- the General Terms and Conditions

services detailed in. The entire Agreement consists of the following:

In addition to the prospectus, the following General Terms and Conditions and the Offer and the Agreement between the Customer and the Service Provider apply - this prospectus describes the data protection procedures:



10xONE - Privacy and Data Management Policy 1.0

occurs first), you will be accepted  
by Customer.

# 1) PURPOSE OF THE REGULATION AND GROUPS OF DATA MANAGEMENT ACTIVITIES

The purpose of the Regulation is to the Service Provider regulate the Management Policy of Data and its Privacy Policy - the latter is certified by the GTC and the Service Provider's internal non-public, but ISO27001 Information Security Standard The

**Service Provider's marketing and sales and service activities can be divided into two parts:**

- 1) **Public website:** at the public website (10xONE.hu)
  - a) browsing on, browsing, orienting,
  - b) registering for news
  - c) and 10xONE software ("Software"). registration, first typically for testing purposes - the latter leads to use for 2) purpose
- 2) **(Available after subscription, contract) Cloud use (so-called Cloud or SaaS) Software use:** 10xONE software available in the IT environment provided by the Service Provider ("Software") entry - secondary to these Regulations is what for this purpose - the conditions of this are regulated in detail by the Service Provider's GTC
- 3) **(available after signing up, concluding a contract) installed locally (so-called On-premise) Use of Software Use of Software:** selected by Customer or Customer, designated, operated in the context of a third party server

le:

- 1) Public Website
  - a) browsing
  - b) news registration
  - c) software registration -> (after e-mail confirmation)
- > Use of software: 2) cloud or 3) on-premise

**SERVICE PROVIDER'S RESPONSIBILITY AND LIMITATION OF LIABILITY**  
**Service Provider in case of 1) and 2) data controller. In the case of locally installed software (3), the Service Provider is neither a data processor nor a data controller from the point of view of GDPR in terms of locally installed software. That is, this (3) locally-installed activity group is not covered by the provisions of these regulations - in the case of this activity group, the Client is responsible for ensuring and enforcing the data management method, for damages and consequences to the Client or third parties It excludes the liability of the Service Provider.**  
**CUSTOMER BY SIGNING AN INDIVIDUAL AGREEMENT OR BY LOGGING IN TO THE SOFTWARE OR INSTALLING THE SOFTWARE ON ITS OWN SERVERS (WHICH COMES INTO FORCE FIRST) SHALL, IN ACCORDANCE WITH THIS RULES:**

The Service Provider describes its data management practices related to 1) and 2) below.

## **Changing these regulations, answering any questions**

Service Provider reserves the right to change this information at any time. Of course, it will notify the Client of any changes in due time.

If you have any questions regarding this post, please email us and our colleague will answer your question. The Service Provider is committed to the protection of the personal data of its customers and partners, and considers it extremely important to respect the right of its customers to self-determination of information. The Service Provider treats personal data confidentially and takes all security, technical and organizational measures that guarantee the security of the data.

## 2 Technical conditions

## 10xONE - Privacy and Data Management Policy 1.0

Service Provider selects and operates the IT equipment used during the provision of the service in such a way that the managed data:

- is accessible to those entitled to it (availability);
- authenticity and authentication are ensured (authenticity of data management);
- its invariance can be justified or its change can be traced (data integrity);
- be protected against unauthorized access (data confidentiality).

The Service Provider shall take appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction. The Service Provider shall ensure the protection of the security of data management with technical, organizational and organizational measures that provide a level of protection appropriate to the risks arising in connection with data management.

Services	Defense
<b>Public Web: depends partly independent activities prior software usage</b>	
Newsletter Subscribing	is protected by https protocol + password database Captcha Subscribe Confirming
Subscribe software	https protocol + password-protected database Subscribe Confirming database within the EU
Services public website	Cookies explicit authorization of
all services	https protocol
<b>10xONE Software use - for cloud service (For locally installed service, the following may differ significantly - depending on local settings and operating conditions)</b>	
Software registration and post-registration software use	Https protocol for full use of the software  Sophisticated authorization system - even field level access settings  Logging system for data access - data record level (i.e. not data element level), in our experience this is sufficient
Login and logout logging	IP address, event date, user ID to which the user name and additional data can be linked

## 3 Cookies (Cookies) and data

### 3.1 Cookies (Cookies)

Service Provider has a small data package on the user's computer, the so-called places a cookie and reads it back at a later visit. The purpose of cookies is to collect information about visitors and their assets; remember the individual settings of the visitors, which can be used e.g. when using online transactions, so you don't have to retype them; facilitate the use of the website; provide a quality user experience. If the browser returns a previously saved cookie, the cookie provider has the option to link the user's current visit to the previous ones, but only for their own content.

#### **When using both the Public Website and the 10xONE Cloud Software: Session Cookies**

These cookies are intended to allow visitors to fully and seamlessly browse your website, use its features and the services available there. These types of cookies last until the end of the session (browsing), and when you close the browser, these types of cookies are automatically deleted from your computer or other device used for browsing.

#### **Only in the case of the public website: Cookies placed by third parties (analytics) The cookies**

website of the Service Provider also uses of

#### **Google Analytics and Facebook**

as third parties.

Both use a statistical service to gather information about how visitors use your websites. You use the data to improve the website and to improve the user experience and commercial offers.

These cookies also remain on the visitor's computer or other device used for browsing, in its browser or until the visitor deletes them until they expire.

## 3.2 Stored personal data

of the following reasons, the following points may store the following data for the following periods:

### 1) Activity:the public Web

Data Circle	aims	Retention	Newsletters	Keepingday
Name	Your identification of the billing	period, as required by the Tax authority (8 years)	You can unsubscribe	unsubscribe from Newsletter
e-mail	an electronic invoice to send in for you to track the status of your order	until you request the removal		
Phone	your notifications forwhen changes are product related to ordering	As long as the we do not receive deletion of requests		

personal data may be processed in the following way: on the one hand, technical data related to the computer you use, browser, Internet address, pages you visit are automatically generated in our computer system, on the other hand you can provide your name, contact information or other a data if you wish to contact us in person while using the Website and may be recorded by any User after entering the Software.

### 2) Aactivity: 10xONE cloud software applications

after subscribing to the 10xONE application of software - we collect the following personal information about users:

Data-round	collection of Cell	Typical related functions	Retention
Name	Your identify, billing, potentially time keeping track, to generate payroll input data, to address it while using the software	User login, exit, events mail notification address  Issue invoice	in software forever - even after unsubscribing from the software, all the data listed must be kept due to security and traceability reasons
E-mail address	To send you an electronic invoice, to track the status of your order, to send alerts	Display in software Use in messages sent  To send you an e-newsletter	
Phone number	To notify you if there is a change in a product or order	User login, e-mail pés, events letter notification address, messages, additional identification data  Display in software for other parties who can see this data anyway	
Tax identification	Employee identification to the state	For recording salary-related data, possible payroll	
Headquarters Address For	invoicing	To issue an invoice	For the period required by Tax authority (8 years)
Billing address For	issuing an invoice For issuing an	invoice	

## 3.3 Additional data stored

Technically recorded during the operation of the system: Data of the Customer's login computer, which is generated during use and which is recorded by the system as an automatic result of technical processes. The data that is automatically recorded is automatically logged by the system upon entry and exit without a separate statement or action by the Customer.

## 4 Data transmission, data processing, scope of data acquaintance

Marketing subcontractor - temporarily - may have access to certain personal data.

The confidentiality clause in contracts with partners covers personal data. They may not be transferred to third parties by partners, either temporarily.

Based on the authorization of an authority or legislation, other bodies may contact the Service Provider in order to provide information, communicate and transfer data, or make documents available. The Service Provider shall provide them with personal data only to the extent and to the extent strictly necessary to achieve the purpose of the request, provided that the party concerned has indicated the exact purpose and scope of the data.

## 5 Client's rights and enforcement possibilities

Client may request information on the handling of his / her personal data, as well as request the correction or deletion or revocation of his / her personal data, except for mandatory data processing, exercise his / her right to carry data and protest in the manner indicated at the data collection.

### 5.1 The right to information

Service Provider shall take appropriate measures in order to provide the Clients with the so-called All information referred to in Articles 13 and 14 of the GDPR and Articles 15 to 22 and Article 34 shall provide each information in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner.

### 5.2 Customer's right of access

Customer is entitled to the data controller

**within 1 month of the request as**

receive feedback from to whether the processing of his / her personal data is in progress, and if such data processing is in progress, he / she is entitled to receive information on the data processed: these data can be found in this prospectus

### 5.3 Right to delete

#### Activity 2): use of 10xONE cloud software application

Customer is entitled to delete personal data from the live database without undue delay if requested by the Service Provider for any of the following reasons: (deletion is not possible in backups, there is a serious technical obstacle - for data that may be restored later from backups, deletion cannot be unfortunately ensured at a reasonable cost):

- personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- Customer withdraws its consent to the data processing and there is no other legal basis for the data processing;
- Customer objects to the data processing and there is no priority legitimate reason for the data processing;
- personal data have been processed unlawfully;
- personal data must be deleted in order to fulfill a legal obligation under Union or Member State law applicable to the controller;
- personal data was collected in connection with the provision of information society services.

**Deletion of data may not be initiated if the processing is necessary:** for the purpose of exercising the right to freedom of expression and information; for the purpose of fulfilling an obligation under Union or Member State law governing the processing of personal data or performing a task carried out in the public interest or in the exercise of official authority vested in the controller; in the field of public health, or for archival, scientific and historical research or statistical purposes, in the public interest; **or to submit, enforce or protect legal claims** In

**connection with this, since the Service Provider also performs its invoicing and partial operation of security control functions on the basis of personal logging of entries, exits and transactions performed in the Software, the scope of activity 2) : In connection with the "use of a**

**10xONE cloud software application”, personal data will not be deleted, even in the case of free use (as it may turn out later that the use would not have been free).**

#### **5.4 Right to**

restrict data management At the Customer's request, the Service Provider restricts data management if one of the following conditions is met:

- Customer disputes the accuracy of personal data, in which case the restriction applies to the period of time that allows checking the accuracy of personal data;
- the data processing is illegal and the Client objects to the deletion of the data and instead requests a restriction on their use;
- the data controller no longer needs the personal data for the purpose of data processing, but the Customer requests them in order to submit, enforce or protect legal claims; or the
- data subject has objected to the processing; in this case the restriction applies for the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the Customer.

If the data processing is subject to restriction, personal data, except for storage, may be used only with the Customer's consent or legal claims, or for the protection of the rights of another natural or legal person or in the important public interest of the Union or of a Member State.

**In connection with this, since the Service Provider also performs its invoicing and partial operation of security control functions on the basis of personal logging of access to, exit from the Software and transactions in the Software, activity 2): “Use of 10xONE cloud software application” In connection with the right to restriction of personal data, the user may not rely on the use of his / her personal data by the Service Provider for his / her identification, logging and tracking of his / her logins and transactions.**

#### **5.5 Right to carry data**

Customer has the right to receive the personal data concerning him / her made available to the data controller in a structured, widely used, machine-readable format and to transfer this data to another data controller.

#### **5.6 Right of**

objection The customer has the right to object at any time, for reasons related to his situation, to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of public authority conferred on the controller or the legitimate interests of the controller or a third party, including based profiling. In the event of an objection, the data controller may not further process the personal data, unless it is justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the Customer or which are related to the submission, enforcement or protection of legal claims.

#### **5.7 Automated decision-making in individual cases, including profiling Te**

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

#### **5.8 Right of withdrawal**

Client has the right to withdraw his consent at any time.

#### **5.9 Right to**

go to court In case of violation of his rights, the Client may take legal action against the data controller.

#### **5.10 Data protection authority procedure**

Complaints can be lodged with the National Data Protection and Freedom of Information Authority: Name: National Data Protection and Freedom of Information Authority Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22 / C. Mailing address: 1530 Budapest, Pf. : 5. Phone: 0613911400 Fax: 0613911410

## 6 Other provisions

### **6.1 Customer's obligations in relation to data protection**

The consequences of any security incident resulting from non-compliance with the following shall be borne by the Customer.

When registering for the Software, Customer must use strong passwords consisting of several unrelated words, numbers, lowercase letters, and a mixture of uppercase letters. Any damage or consequences resulting from this violation shall be borne by the Customer.

Customer shall ensure that each user name is associated with one and only one natural person, that is, that no one person may use the Software or the materials on it with one user name.

### **6.2 Other**

Information on data processing not listed in this prospectus will be provided at the time of data collection.