

**PRIVACY POLICY**  
*access4you.io*

**1. Data Controller**

**Access4you International Kft.**

registered seat: 1094 Budapest, Páva utca 13. 2. em. 1.  
represented by: Berecz Balázs Márton managing director  
e-mail: info@access4you.io

**2. Data processing**

**2.1. Registration from the consumer side**

Data	Objective of data processing	Retention time	Legal basis of data processing	Rights
<b>Users' profile basic data:</b> <i>name, e-mail address, password, Vodafone custom discount code</i>	Provision of service - providing access	Until erasure	<b>Data management</b> is required to provide the service (i.e. to fulfill the contract). You cannot access our services without registration. [Article 6 (1) GDPR b.) point]	4.2.-4.6.
<b>Phone number, location information - optional</b>	Provision of service - Immediate notification of security incidents	Until erasure	<b>Data management</b> is required to provide the service (i.e. to fulfill the contract). You will not be able to use this service without providing the information. [Article 6 (1) GDPR b.) point]	4.2.-4.6.
<b>Location data - optional</b>	Provide service - Showing certified locations in your vicinity	Until erasure	<b>Data management</b> is required to provide the service (i.e. to fulfill the contract). You will not be able to use this service without providing the information. [Article 6 (1) GDPR b.) point]	4.2.-4.6.
<b>Special need or personal assistant status - optional</b>	Showing locations complying with the request	Until erasure	<b>Express consent</b> which you provide by selecting the request and clicking on the declaration. <b>The consent may be withdrawn at any time or it may be amended within the application under "My Profile"</b> . The withdrawal of consent shall not affect the lawfulness of processing based on consent	4.1.-4.6.

			before its withdrawal. [Article 6 (1) (a) of the GDPR]	
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Data on your age, education, gender, country and city of residence, as well as any questionnaires will be treated anonymously for statistical purposes.

## 2.2. Registration from the service provider site

Data	Objective of data processing	Retention time	Legal basis of data processing	Rights
<b>Customer access and upload option (profile data): <i>name, e-mail address, password, phone number</i></b>	Enabling the introduction of the certified place	Until protest or termination of the contractual relationship	<b>Our legitimate interest</b> in performing the contract. <b>You have the right to object at any time to processing of personal data concerning you by using contact information of ours in Section 1.</b> [Article 6 (1) (f) of the GDPR]	4.2.,4.3. 4.5.,4.7.
<b>Personal data in issued invoices and personal data in the contract forming the legal basis of the invoice <i>name and address of the self-employed person; contact information and data of the person signing the contract</i></b>	Fulfilment of a legal obligation	8 years from the date of issue of the invoice and termination of the contract	<b>Fulfilment of a legal obligation.</b> It is necessary to keep the data after invoicing due to taxation and accounting regulations <sup>1</sup> . Without data provision, it is not possible to place an order. [Article 6 (1) (c) of the GDPR]	4.2.,4.3. 4.5.
<b>Subscribing to newsletters: <i>name, e-mail address</i></b>	Sending e-mail notifications about our news	Until unsubscription	<b>Consent</b> which you provide by subscribing. <b>Consent may be withdrawn at any time by using any of our contact details in Section 1 or by clicking on “Unsubscribe” button at the end of the e-mail.</b> The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. [Article 6 (1) (a) of the GDPR]	4.1.-4.6.
<b>Personal data provided in inquiries: <i>name, e-mail address, other personal data provided</i></b>	Answering inquiries, complaint handling	5 years	<b>Consent</b> which you provide by contacting us. <b>Consent may be withdrawn at any time by using any of our contact details in Section 1.</b> The withdrawal of consent shall not affect the lawfulness of processing based on consent before its	4.1.-4.6.

<sup>1</sup> On the basis of Article 169 Section (2) of Act C of 2000 on Accounting: „The accounting documents underlying the accounting records directly or indirectly (including ledger accounts, analytical records and registers) shall be retained for minimum 8 years, shall be legible and retrievable by means of the code of reference indicated in the accounting records”

			withdrawal. [Article 6 (1) (a) of the GDPR]	
<b>Data provided via Facebook, Youtube, Instagram, LinkedIn channels: profile data</b>	Information about current news	Until you unfollow (until unsubscription)	<b>Consent</b> which you provide by following. <b>Consent may be withdrawn at any time by unsubscribing.</b> The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. [Article 6 (1) (a) of the GDPR]	4.1.-4.6.
<b>Automatic recording of IP address upon visiting the homepage</b>	Technical development of the IT system, checking the operation of the service, making statistics	30 days	On the basis of <i>Section (3) Article 13/A of Act CVIII of 2001 on e-commerce and certain issues regarding Information Society services</i> , <b>our legitimate interest in the proper operation of the homepage. You have the right to object at any time to processing of personal data concerning you by using contact information of ours in Section 1.</b> [Article 6 (1) (f) of the GDPR]	4.2.,4.3. 4.5.,4.7.
<b>Personal data of contact persons of undertakings in the course of requesting assessment (request for quotation), contractual relationship and other business relationships: name, job profile, phone number, e-mail address</b>	Maintaining relations in order to perform or coordinate the agreement	Until the relationship exists or until objection	<b>Our legitimate interest</b> in maintaining relations. <b>You have the right to object at any time to processing of personal data concerning you by using contact information of ours in Section 1.</b> [Article 6 (1) (f) of the GDPR]	4.2.,4.3. 4.5.,4.7.

### 2.3. Other data management

Data	Objective of data processing	Retention time	Legal basis of data processing	Rights
<b>If you apply, upload a photo if you are included</b>	Publication option to provide the company promotion of the company	Until withdrawn	Contribution you give by uploading. Consent may be withdrawn at any time by contacting us at one of the contact details indicated in section 1. The withdrawal does not affect the previous processing prior to the withdrawal. . [Article 6 (1) (f) of the GDPR]	4.1.-4.6

<b>Subscribe to our newsletter: name, e-mail address</b>	To be notified of our news by email	Until unsubscription	Contribution you give by subscribing. Consent can be withdrawn at any time by contacting us at one of the contact details indicated in point 1, or by using the "Unsubscribe" at the end of the e-mail. Such withdrawal shall not affect the lawfulness of the processing that preceded it. . [Article 6 (1) (f) of the GDPR]	4.1.-4.6.
<b>Personal data provided in requests: name, e-mail address, other personal data provided</b>	Responding to enquiries and handling complaints	5 years	Consent, which you give by sending the request. You may withdraw your consent at any time by contacting us at one of the contact details indicated in point 1. Such withdrawal shall not affect the lawfulness of the processing that preceded it. [Article 6 (1) (f) of the GDPR]	4.1.-4.6.
<b>Data provided on Facebook, Youtube, Instagram, LinkedIn: profile data</b>	Information on current news	The follow-up until you unsubscribe	Contribution you give by following. You can withdraw your consent at any time by unsubscribing. Withdrawal does not affect the lawfulness of the prior processing. [Article 6 (1) (f) of the GDPR]	4.1.-4.6.
<b>Automatic IP address capture when viewing the website</b>	The technical development of the IT system, the monitoring of the functioning of the service, production of statistics	30 days	Pursuant to Article 13/A (3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services on certain aspects of information society services, we have a legitimate interest in the proper functioning of the website. The processing of personal data You may object to the processing of your personal data at any time using one of the contact details indicated in point 1. [Article 6 (1) (f) of the GDPR]	4.2.,4.3. 4.5.,4.7.
<b>Information on the contact details of the Intermediary's partners: name, job title, telephone number, e-mail address</b>	Liaison for contract performance and negotiation	Until objection or termination of the contractual relationship termination of the contract or change of contact person	Our legitimate interest in the performance of the contract and in maintaining contact. You can object to the processing of your data at any time by contacting us at one of the contact details indicated in point 1. [Article 6 (1) (f) of the GDPR]	4.2.,4.3. 4.5.,4.7.

<b>Invoices issued to the Intermediary Partner may contain and the personal data contained in the contract on which the invoice is based: <i>name and address of the sole trader; name and address of the contractor contact persons and signatories of the contract details</i></b>	Legislation fulfill an obligation	8 years from the date of invoice and termination of the contract	Fulfilling a legal obligation. After invoicing, retention is required for tax and accounting purposes. Without this information, no contract can be concluded. [Article 6 (1) (c) of the GDPR]	4.2.,4.3. 4.5.
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#### 2.4. Joint processing with an intermediary partner

Based on its agreement with Access4you, the Partner will carry out the sales and, if so agreed, the auditing processes. In the course of this activity, the personal data of the contact persons and acting persons of the companies and other entities concerned, as detailed below, necessary for the contact, will be obtained and recorded in Access4you's CRM system, including, in the case of an audit, in the AdminTool system. In this case, the Partner and Access4you will act as joint controllers as described below and will be jointly and severally liable to the data subjects for any damage resulting from the improper processing of personal data. The common contact details of the Parties are those indicated in point 1.

If the cooperation agreement is terminated, the contract concluded by the Partner will automatically be transferred to Access4you, and Access4you will become the independent controller of the data indicated below.

Data	Objective of data processing	Retention time	Legal basis of data processing	Rights
<b>Details of the representative or contact person of the audited organisation or company: <i>name, job title, telephone number, e-mail address</i></b>	Liaison for contract performance and negotiation	Until objection or termination of the contractual relationship termination of the contract or change of contact person	Our legitimate interest in the performance of the contract and in maintaining contact. You can object to the processing of your data at any time by contacting us at one of the contact details indicated in point 1. [Article 6 (1) (f) of the GDPR]	4.2.,4.3. 4.5.,4.7.

<p><b>On the invoice issued, if any personal data contained in the contract on which the invoice is based:</b>  <i>name and address of the sole trader; name and address of the contractor, contact persons and signatories of the contract details</i></p>	<p>Legislation fulfill an obligation</p>	<p>8 years from the date of invoice and termination of the contract</p>	<p>Fulfilling a legal obligation. After invoicing, retention is required for tax and accounting purposes. Without this information, no contract can be concluded. [Article 6 (1) (c) of the GDPR]</p>	<p>4.2.,4.3. 4.5.</p>
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Information about the data processors of the intermediary partner is provided by the intermediary partner.

### 3. Data processors and other data controllers

#### 3.1. Data Controllers:

- ✓ Hosting services are provided by **HostGator.com** (The Endurance International Group, Inc.; registered seat: 10 Corporate Drive Burlington, MA 01803 United States)
- ✓ We use the system of **Mailchimp** to send newsletters to users. (The Rocket Science Group, LLC; registered seat: 675 Ponce de Leon Ave NESuite 5000 Atlanta, GA 30308 USA). Conformity of data transfer shall be warranted by the application of Standard Data Protection Provisions; <https://eur-lex.europa.eu/legal-content/HU/TXT/HTML/?uri=CELEX:32010D0087&from=en>;
- ✓ Software and web development are carried out by WRD Labs Zrt. (registered seat: 1051 Budapest Sas u. 10-12.);
- ✓ Our CRM system is provided by Pipedrive (Pipedrive OÜ; registered seat: Mustamäe tee 3a., Tallinn, 10615, Estonia);
- ✓ Our AdminTool system is provided by DigitalOcean, LLC (headquarters: 101 6th Ave, New York, NY 10013, United States) and Mailgun Technologies, Inc 112 E. Pecan St. #1135, San Antonio, TX 78205 US)
- ✓ Our data base is managed by **DigitalOcean, LLC** (registered seat: 101 6th Ave, New York, NY 10013, United States). Conformity of data transfer shall be warranted by the application of Standard Data Protection Provisions; [https://www-static.cdn.prismic.io/www-static/4578633e-ba6b-4c45-845c-1e69848c6e3b\\_DigitalOcean+SCC+Template.pdf](https://www-static.cdn.prismic.io/www-static/4578633e-ba6b-4c45-845c-1e69848c6e3b_DigitalOcean+SCC+Template.pdf);

#### 3.2. Other data controllers

- ✓ Bookkeeping is carried out by **3k Consulting Kft.** (registered seat: 1151 Budapest, Mélyfűró u. 2.B. ép.)
- ✓ **Social media operator companies** are separate data controllers:

- **facebook and Instagram** (Facebook Ireland Ltd. (registered office, seat: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. <https://www.facebook.com/privacy/explanation>; <https://www.facebook.com/help/instagram/155833707900388/>);
- **Youtube** (Google Ireland Limited (registered seat: Gordon House, Barrow Street, Dublin 4, Ireland; <https://policies.google.com/technologies/product-privacy?hl=hu>);
- **LinkedIn** (LinkedIn Ireland Unlimited Company (registered seat: Gordon House, Barrow Street, Dublin 2, Ireland; <https://www.linkedin.com/legal/privacy-policy>);

#### **4. Your rights**

In relation to data processing, you are entitled to the rights set out in Sections 4.1.-4.7. Insofar as you intend to use any of them, please inform us about such intention of yours by using any of the contact information in Section 1.

##### *Identification*

Before the request is granted, we always have to identify you. It is sufficient to provide us with some personal information which are otherwise at our disposal.

##### *Responding to the request*

Following identification, we provide information via a letter or e-mail – identically with the form of the request.

##### *Administrative time limit*

We inform you about the measures taken upon your request within 1 (one) month of the receipt of your request at the latest. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We inform you of any extension within 1 (one) month of receipt of the request. If no measures are taken, we shall inform you thereof within the 1 (one) month administrative time limit. You may lodge a complaint against it with the NAIH (Section 5.1) and seek a judicial remedy (Section 5.2).

##### *Administrative fee*

The required information and the measures taken are free of charge. Except when requests are manifestly unfounded or excessive, in particular because of their repetitive character. In this case we may charge a fee or refuse to act on the request.

##### 4.1. You have the right to withdraw your consent

You may withdraw your consent to data processing based on your previous consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

##### 4.2 You have the right to ask for information (access)

You may ask for information as to whether or not your personal data are being processed, and, where that is the case, access to the personal data and the following information:

- ✓ What is the purpose of the processing?
- ✓ What categories of personal data are processed?
- ✓ Who are these data transferred to?
- ✓ How long are these data kept?
- ✓ What rights and legal remedies do you have?
- ✓ Who gave your data to us?
- ✓ Whether we make an automated decision relating to you by using your personal data. In those cases, you may request information about the logic (method) involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- ✓ If you found that we transfer your data to a third country (non-EU member country), you have the right to be informed of the appropriate safeguards to your personal data.
- ✓ You may ask for a copy of your personal data undergoing processing (for further copies we charge a fee based on administrative costs).

#### 4.3. You have the right to request rectification

You may ask for correction or amendment of your incorrectly or incompletely registered personal data.

#### 4.4. You have the right to request erasure (“forgetting”) of your personal data

You may ask for erasure of your personal data if:

- a) The personal data are no longer necessary in relation to the purposes for which we collected them;
- b) Data processing is based on your consent;
- c) Objection to processing is successful;
- d) It turns out that personal data have been unlawfully processed;
- e) The personal data have to be erased for compliance with a legal obligation in Union or Member State law;

Personal data shall not be erased if processing is necessary

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law or for the performance of a task carried out in the public interest;
- c) for the establishment, exercise or defence of legal claims.

#### 4.5. You have the right to request restriction of data processing

You may request restriction of data processing where one of the following applies:



- a) if you contest the accuracy of the personal data, then restriction applies for a period that enables verification of the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims;
- d) You object to data processing; restriction applies to the time period until it is verified whether the legitimate grounds of the controller override those of the data subject.

In case of restriction, such personal data shall – with the exception of storage – only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

#### 4.6. You have the right to require transfer of your personal data (right to data portability)

You may obtain your processed personal data in a machine-readable format and have the right to transmit those data to another controller, or upon your requests we transfer your data in case the data processing is based on your consent, or on a contract and the processing is carried out by automated means.

#### 4.7. You have the right to object to processing of your personal data

You have the right to object to processing of your personal data if legal basis of data processing is the legitimate interest of the Data Controller or a third party. In this case we erase personal data unless processing is supported by such compelling legitimate interests which override any other interests or are necessary for the establishment, exercise or defence of legal claims.

## **5. Remedies**

### 5.1. You have the right to lodge a complaint with NAIH

If you consider that processing of your personal data is in contradiction with the provisions of the Data Protection Regulation, you may file a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

NAIH

president: dr. Péterfalvi Attila

postal address: 1363 Budapest, Pf.: 9.

address: 1055 Budapest, Falk Miksa utca 9-11.

Phone: +36 (1) 391-1400

Phone: +36 (1) 391-1410

web: <http://naih.hu>

e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) or [privacy@naih.hu](mailto:privacy@naih.hu)

### 5.2. You have the right to go to court

If you consider that processing of your personal data is in contradiction with the provisions of the Data Protection Regulation and your rights set out in the Data Protection regulation have been infringed, you may go to court.

Settlement of the lawsuit shall fall within the jurisdiction of the court. The data subject may bring the action before the regional court having territorial jurisdiction over his domicile or his place of residence – according to his choice. Any person who otherwise does not have the capacity to be a party may be a party to the court action. The Authority may intervene in the action in order to facilitate the success of the data subject. Beyond the contents of the GDPR, Book 2, Part three, Title XII (Section 2:51.- Section 2:54.) of Act V of 2013 on the Civil Code And other legal regulations on court proceedings shall also apply.

### 5.3. Compensation and restitution

If the Data Controller causes damage by processing the data of the data subject unlawfully or infringes the rights relating to his personality, the Data Controller may be obliged to pay grievance award. The data controller shall be exempted from liability for damage and from the obligation to pay grievance award if he proves that the damage or the violation of the data subject's personality rights occurred as a consequence of an unavertable reason falling outside the scope of processing.

## **6. Data security**

We will do our best to grant proper data security in compliance with the extent of the risk by taking into account state of the art technology, the cost of implementation and the nature of processing. We employ proper technical and organisational measures to mitigate the risks relating to the rights and freedom of natural persons. We always process personal data confidentially, by maximizing its resistance and by providing restoration if necessary.

*Last update: 12 October 2021*