

Privacy policy

Indeveyes Technologies Ltd.

1. Introduction

Indeveyes Technologies Informatikai és Mérnöki Szolgáltató Korlátolt Felelősségű Társaság (registered office: 1106 Budapest, Váltó utca 16. 2.; head office: 1138 Budapest, Dunavirág u. 2. I. tower, 3rd floor, company registration number: 01 09 377976, tax number: 28972781-2-42, hereinafter referred to as "Indeveyes Technologies") is committed to the secure and transparent processing of personal data in accordance with the law.

The contact persons of the customers who intend to use the services provided by Indeveyes Technologies and of the other contractual partners, as well as the Indeveyes Technologies employees, are subject to the rules on the processing of personal data and the practices to be followed by Indeveyes Technologies (hereinafter referred to as "the Policy").

The Policy is designed to comply with the European Union's General Data Protection Regulation ("GDPR"). In accordance with the principle of data protection by design and by default, Indeveyes Technologies implements appropriate technical and organisational measures, both in the definition of the data processing methods and in the processing activities, to ensure the effective implementation of the data protection principles and to incorporate in the processing the necessary guarantees to meet the requirements of the GDPR and to protect the rights of data subjects as set out above. Indeveyes Technologies ensures that, by default, only personal data that are necessary for the specific purpose of the processing are processed. This obligation relates to the amount of personal data collected, the extent to which they are processed, the duration of their storage and their availability. Indeveyes Technologies has data security measures in place to ensure that personal data cannot be made available to an indeterminate number of individuals without the intervention of a natural person by default.

2. Basic data protection concepts

2.1. What is personal data?

We talk about personal data when we can identify a natural person on the basis of information. The most important personal data are the so-called identification data, e.g. name, address, telephone number, email address, but also images and video recordings are considered personal data.

2.2. Who is the data subject?

Also known as data latency. A natural person who is or can be identified on the basis of his or her personal data.

2.3. Who is the data controller?

The controller may be a natural person or an undertaking which, in the course of its activities, collects information from natural persons as described above, i.e. personal data, records them in some form (e.g. on a computer or in a notebook), stores them or uses them for some purpose. For the data processing activities described in the Policy, the controller will be Indeveyes Technologies.

2.4. Who is the data processor?

The data processor is entrusted by the controller with the processing of personal data on his or her behalf and on the basis of his or her instructions.

2.5. Which authority can inspect and on what basis?

In Hungary, the National Authority for Data Protection and Freedom of Information ("NAIH") has the right and the obligation to monitor compliance with data protection regulations. The NAIH also has the power to impose fines on data controllers and processors who violate the standards. The NAIH carries out its inspections on the basis of the GDPR and the Information Act (Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information).

2.6. What do we mean by data transmission?

When a person sends personal data to another person (called a recipient), he or she is making a transfer. Transfers can be made in person or remotely, on paper, by email or even through a mobile application. It is possible to transfer individual personal data, but it can also be done by sending entire databases. The point is that the recipient also has access to the personal data previously held by the sender as a result of the transfer.

2.7. What is the term profiling?

Profiling is when personal data is combined with some automated process in such a way that it can be used to draw out certain personal characteristics of a person, such as job performance, economic situation, health, personal preferences, interests, behaviour, location. The so-called profile can then be used to predict the future behaviour of the person and, for example, to offer services accordingly.

2.8. What is a data breach?

Data breaches should be considered as attacks or accidents that result in personal data that have been securely handled and stored until now being accessed, damaged, destroyed or lost by unauthorised persons. Nowadays, hacker attacks are the most common form of hacking into computer databases containing personal data (data theft), but the destruction of a server station by fire should also be treated as an incident.

2.9. What is considered as the data subject's consent?

In all cases, the controller needs a legal basis for the processing. Consent is, inter alia, one of the possible legal bases for processing. Consent may be an explicit statement (e.g. "I agree to...") or an implied conduct (e.g. being in an area monitored by a camera) by which the data subject indicates his or her agreement to the processing of personal data concerning him or her. The consent must be voluntary and unambiguous, must relate to specific processing and must be based on appropriate information.

2.10. What is considered processing necessary for the performance of a contract?

In all cases, the controller needs a legal basis for the processing. The performance of a contract is, inter alia, one of the possible legal bases for processing. Processing is necessary for the performance of a contract to which the data subject is a party (e.g. an employment relationship).

2.11. What is considered processing for the fulfilment of a legal obligation?

In all cases, the controller needs a legal basis for the processing. Compliance with a legal requirement is, inter alia, one of the possible legal bases for processing. Indeveyes Technologies is therefore entitled to process personal data that is necessary for the fulfilment of an obligation imposed on Indeveyes Technologies by Hungarian or EU law.

3. Basic rules for the processing of personal data

Indeveyes Technologies has designed and conducts its data management activities in accordance with the principles set out in the GDPR. Indeveyes Technologies applies these principles at every step of the data processing.

3.1. Legality

Indeveyes Technologies ensures the lawfulness of its data processing activities at all times. For each processing operation, Indeveyes Technologies has identified and identifies the legal basis for the processing, i.e. an interest, a reason that justifies the collection and storage of personal data.

3.2. Goal orientation

Indeveyes Technologies will always, in all cases, process data for a clearly defined (and legitimate) purpose. A given legal basis may be linked to several specific purposes. For example, Indeveyes Technologies processes the personal data of its contractual partners' contact persons for the purposes of maintaining contact and fulfilling contractual obligations.

3.3. Data economy

Indeveyes Technologies processes only such and as much personal data as is necessary and relevant for the specific purpose of the processing.

3.4. Accuracy

Indeveyes Technologies ensures that it has the organisational and IT capacity to remedy inaccurate or incomplete personal data without undue delay after the errors or omissions have been identified. If the error cannot be corrected because the information necessary for correction or completion is not available, the personal data will be deleted by Indeveyes Technologies.

3.5. Limited shelf life

Indeveyes Technologies will process personal data for a period appropriate to the purpose of the processing, i.e. it will delete the personal data when it is no longer necessary for the purpose or when the purpose has been fulfilled.

3.6. Data security

Indeveyes Technologies will take all necessary technical and organisational measures, with the assistance of its employees, to ensure that the personal data it processes is collected, stored and handled in a secure environment, protected from unauthorised access.

3.7. Accountability

Compliance with GDPR rules is ensured by Indeveyes Technologies. Indeveyes Technologies will also facilitate compliance by establishing the necessary internal data management rules and enforcing their practical application.

4. Data subjects' rights and redress procedures

The data subjects affected by the data processing carried out by Indeveyes Technologies have the following rights under the GDPR, the Information Act and the Labour Code.

4.1. Information

Indeveyes Technologies will inform the data subject, at the time of collection of the personal data, and thereafter within one month of receipt of the request for the collection of the personal data, but at the latest at the time of the first contact, by making this Policy available to the data subject in any case:

- contact details of Indeveyes Technologies;
- the purposes and legal basis of the processing;
- the recipients or categories of recipients to whom or which the personal data have been or will be disclosed;
- the envisaged period of storage of personal data or the criteria for determining that period;
- information on the right to request the rectification, erasure or restriction of processing of personal data and the right to object to processing;
- information on the right to withdraw consent to processing;
- information on the complaints procedure that can be submitted to the competent authority;
- the conditions and circumstances of data transfers to third countries;
- the legitimate interest of Indeveyes Technologies as data controller, which justifies the processing;
- the source of the data.

4.2. Access to information on data management

The data subject may contact Indeveyes Technologies at any time to ask whether Indeveyes Technologies processes his or her personal data. If Indeveyes Technologies does indeed process the data subject's personal data, Indeveyes Technologies will provide the data subject with the information specified in point 4.1.

4.3. Right to rectification and integration of personal data

On the basis of the principle of accuracy, if the data subject becomes aware that personal data processed by Indeveyes Technologies are inaccurate or incomplete, he or she has the right to contact Indeveyes Technologies with a request for rectification or completion and Indeveyes Technologies will comply with the request without delay.

4.4. *Right to be forgotten*

Indeveyes Technologies will delete the personal data of the data subject processed by Indeveyes Technologies upon a reasoned request of the data subject within the time limit specified in this Policy for each processing operation (point 7), if any of the following grounds apply:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- personal data are collected directly in connection with the provision of information society services to children.

Indeveyes Technologies is also unable to delete the personal data of the data subject in the event of a request under this point, even if the processing is necessary to comply with a legal obligation or if it is necessary to pursue a claim (e.g. compensation). Indeveyes Technologies shall inform the data subject requesting the erasure of the existence of these circumstances.

4.5. Right to restriction of processing

If the data subject has notified Indeveyes Technologies of inaccuracies in the personal data processed by Indeveyes Technologies, Indeveyes Technologies will, upon request, suspend the processing of the personal data concerned by the request until it verifies the accuracy of the personal data and decides on its correction or integration.

Indeveyes Technologies also restricts processing if.

- the unlawfulness of the processing has been established and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the personal data are no longer necessary for the purposes of the processing but are required for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing and a period of time is needed to consider whether Indeveyes Technologies' legitimate grounds override the data subject's legitimate grounds.

4.6. Right to data portability

The data subject has the right to receive the personal data provided to Indeveyes Technologies in a commonly known and used, structured, machine-readable format and to send it to another controller (e.g. a new employer) or to have it transmitted directly to the other controller by Indeveyes Technologies on the basis of the data subject's instructions. Indeveyes Technologies will comply with the request if the processing of personal data in a computer system is based on the data subject's consent or is necessary for the performance of a contract.

4.7. Right to object

If Indeveyes Technologies processes personal data of the data subject for its own or for the legitimate interests of another person, the data subject has the right to object to this processing. In the event of an objection, Indeveyes Technologies may continue to process the personal data of the data subject only if he or she demonstrates compelling legitimate grounds for the processing which override (i) the rights or interests of the data subject, or (ii) the necessity to exercise the rights of the data subject.

4.8. Right to lodge a complaint with the supervisory authority

If the data subject considers that Indeveyes Technologies is in breach of the standards applicable to the processing of his or her personal data, the data subject may lodge a complaint with the NAIH as the supervisory authority responsible for the processing activities.

4.9. Right to apply to the courts

Irrespective of the exercise of the rights listed above or the right to apply to the supervisory authority, the data subject has the right to bring an action before a court against Indeveyes Technologies as controller or as processor for infringement of his or her rights in relation to data processing.

4.10. Right to compensation

If the data subject suffers damage as a result of unlawful processing, he or she has the right to claim compensation. Indeveyes Technologies shall be liable as data controller for any damage caused by the processing.

If Indeveyes Technologies violates the personal rights of the data subject by unlawfully processing the data or by breaching the requirements of data security, the data subject may claim damages from Indeveyes Technologies. Indeveyes Technologies shall be liable to the data subject for any damage caused by the data processor and Indeveyes Technologies shall also pay the data subject any damages for the infringement of the data subject's right to privacy caused by the data processor. Indeveyes Technologies shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that the damage or the infringement of the data subject's personality rights was caused by an unforeseeable cause outside the scope of the processing for which it is not liable. No compensation shall be payable and no damages shall be recoverable where the damage resulted from the intentional or grossly negligent conduct of the data subject. The general civil liability of Indeveyes Technologies shall be governed by the rules of the Civil Code and the Information Act. The above provisions on damages shall only apply in the case of a mandatory provision of law.

If the data subject so requests, Indeveyes Technologies will provide detailed information on the means of redress available to him or her.

5. Temporal scope

These Rules shall be in force from 9 March 2021 until revoked.

6. Access to the Code

Indeveyes Technologies will ensure that this Policy is available at all times on its website (www.indeveyes.com, www.wamewo.com) (hereinafter referred to as the "Website") and in hard copy at the Indeveyes Technologies central administration location.

7. Certain data processing

The Policy describes below the specific data processing activities of Indeveyes Technologies and sets out the rules applicable to that data processing.

7.1. Data processing during recruitment

Indeveyes Technologies processes the personal data of applicants for new employees and of those interested in future job openings on the basis of the consent of the data subjects. For detailed information on data processing, please refer to the Recruitment Privacy Notice available on the Website.

7.2. Processing of personal data of employees

Indeveyes Technologies processes the personal data of its employees in the course of its operations for the performance of employment contracts and on the basis of certain legitimate interests.

Detailed information on the processing of employees' personal data is contained in the employment data management policy, which is available to employees in electronic form on the internal server of Indeveyes Technologies at all times and is made available to the employee (employee) upon the establishment of the employment relationship (other employment relationship).

7.3. Data processing relating to customers, contractual partners

Indeveyes Technologies is a provider of industrial software development services. To this end, Indeveyes Technologies maintains ongoing contact with its customers, including notification of Indeveyes Technologies events. Indeveyes Technologies uses external service providers (subcontractors and suppliers) for certain services (e.g. payroll) and raw materials to support its activities. It also processes data in its dealings with these contractual partners.

The contact natural persons designated in the contract with the customers or suppliers or otherwise designated by the partners may differ from the person who duly represents the Indeveyes Technologies contractual partner, signs the contract and is therefore entitled to

transfer the personal data as data subject. In this case, Indeveyes Technologies does not obtain personal data concerning the data subject from the data subject. Indeveyes Technologies processes the following personal data of the contact persons provided in *the contracts*:

- name;
- phone number;
- email address.

The legal basis for the processing is the legitimate interests of Indeveyes Technologies (Article 6 (1) (f) GDPR), for which Indeveyes Technologies has carried out the interest test, as follows.

Indeveyes Technologies' core business is the provision of industrial software development services.

Whether it's an ad hoc assignment or a long-term partnership, keeping in touch with the customer and suppliers is essential to meet the obligations of the contract. In the service contracts, the parties undertake to send notifications relating to the contract to the contact persons indicated in the contract or, in some cases, subsequently designated by the contractor. Such notification enables Indeveyes Technologies to receive the customer's request for a particular product or service and to involve the supplier in the project. Indeveyes Technologies has a legitimate and real interest in ensuring that both Indeveyes Technologies and the contractor are able to fulfil their obligations under the contract.

Indeveyes Technologies has a legitimate interest in not processing personal data that it has obtained from the data subject's employer or principal, rather than directly from the data subject.

Indeveyes Technologies incorporates the following safeguards and risk mitigation measures into its data management:

- Indeveyes Technologies limits the scope of personal data processed to the contact details necessary for day-to-day contact.
- The personal data of the contact persons are stored in hard copy in lockable cabinets and offices, as set out in the relevant contract, and electronically in the CRM system, accessible with a unique ID and password.
- Employees may only store personal data of contact persons in the office and on company equipment and may only use it for contact purposes in the performance of their work duties.

- The personal data of the contact persons will be used by Indeveyes Technologies solely for the purpose of contacting them for the performance of the contracts. The contact will be made at a time and in a manner appropriate to the needs of the partner and the nature of the project, taking into account working time and, as far as possible, privacy.
- The Privacy Policy for Indeveyes Technologies' employees contains detailed instructions on the processing of personal data of contact persons.

Based on a balancing of the interests of Indeveyes Technologies and the contacts, and taking into account the above circumstances, Indeveyes Technologies has concluded that the processing of the contacts' personal data has a low impact on the privacy of the contacts and that the safeguards listed above minimize the risk that personal data will be collected and used more extensively than necessary. Accordingly, the interests of Indeveyes Technologies prevail over the interests, fundamental rights and freedoms of the data subjects, and processing is therefore permitted in order to pursue the legitimate interests of Indeveyes Technologies.

Indeveyes Technologies will process the contact data for the duration of the existing legal relationship and after the termination of the legal relationship, until the statute of limitations (5 years) for the enforcement of any legal claims (e.g. compensation). If a payment is made under the contract, the documents relating to the payment and containing the contact person's personal data will be considered accounting records, which Indeveyes Technologies will keep for 8 years in accordance with the applicable accounting standards.

For more information on the rights of data subjects as data subjects in relation to the processing of data by Indeveyes Technologies, please see section 4 above.

7.4. Website-related data management

The scope of the Policy does not cover the services and data processing of websites and service providers to which there is a link on the Website (e.g. Facebook, Youtube, LinkedIn). Such services are governed by the provisions of the third party service provider's privacy policy and Indeveyes Technologies shall not be liable for such processing.

For the purposes of this point, the data subject shall also be understood to be the person who visits and browses the Website.

Indeveyes Technologies provides its own hosting service for the operation of the Website, and thus also supports Indeveyes Technologies' data processing on the Website as a data processor.

The Website uses cookies. The cookie is sent by the web server to the visitor's browser and then returned by the browser to the server. By clicking on the "Accept" button, the data subject gives his/her explicit consent to the storage of cookies on his/her device. Cookies are encoded data strings, paths, which are stored by the browser of the person visiting the Website and which can only be interpreted in conjunction with the server concerned. The server itself stores the user's data, not the cookie. The next time the data subject visits the Website, his/her browser will scan the cookie and display the information or element on the Website that originally set the cookie. Cookies are usually stored when you enter or leave the Website. Cookies cannot be used to identify the data subject and do not affect the performance of the data subject's device. Depending on their type, these files are deleted at the end of the browsing session (temporary cookies) or after a longer period of time (permanent cookies). For more information on cookie technology and how cookies work, please visit for example www.allaboutcookies.org.

Cookies may be used for the following purposes:

- website performance measurement;
- browsing analysis;
- measuring subscription habits;
- display relevant advertising.

The data subject can determine the conditions for storing and accessing cookies by setting his or her internet browser accordingly. Most browsers are set to accept cookies by default. However, you can disable cookies altogether or set your browser to send a warning when you send a cookie. To prevent the acceptance of cookies or to change the settings, the data subject must change the browser settings. Information on how to disable or enable cookies can be found in the "Help" section of the browser. For popular browsers, information on how to set cookies can be found at the following links:

- IExplorer: <https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>;
- Mozilla Firefox: <https://support.mozilla.org/hu/questions/new/desktop/cookies>;
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=hu>;
- Opera:
<http://help.opera.com/opera/Windows/2256/en/controlPages.html#manageCookies>
- Safari: <https://support.apple.com/kb/PH5042>

More information about the cookies used when you visit the Website from a mobile device can be found on the following pages:

- Android: <https://developer.android.com/reference/android/webkit/CookieManager.html>
- Blackberry: https://docs.blackberry.com/en/smartphone_users/deliverables/3200/Turn_off_cookies_in_the_browser_60_1072866_11.jsp
- Opera: <https://www.opera.com/help/tutorials/security/privacy/>
- Safari iOS: <https://support.apple.com/kb/PH5042>

Indeveyes Technologies will disclose to the requesting authority, on the basis of a formal judicial or police request, the data relating to the data subject and processed by the data subject or the Hosting Provider in connection with the visit to the Website.

Indeveyes Technologies measures website traffic data using the Google Analytics service. Data is transmitted when using this service. The data transmitted cannot be used to identify the data subject. More information about Google's privacy policy can be found here: <https://policies.google.com/privacy>.

7.6. Data processing for marketing purposes

Indeveyes Technologies processes the personal data (name, contact details) of contacts of potential new contractual partners for the purpose of sending marketing enquiries.

7.6.1. Newsletter

Indeveyes Technologies uses this service of The Rocket Science Group LLC, as the operator of the MailChimp newsletter platform, to send newsletters to subscribed recipients. The Rocket Science Group LLC is the data processor used by Indeveyes Technologies and Indeveyes Technologies ensures the security of personal data and data processing in compliance with the GDPR through the control of the data protection policy of The Rocket Science Group LLC.

The legal basis for processing is the prior consent of the recipient, which is given by subscribing to the newsletter.

If the recipient of the newsletter unsubscribes from the newsletter, Indeveyes Technologies will consider this as a withdrawal of consent and will no longer send the recipient any newsletters from the date of the unsubscription and will remove the newsletter from the address list.

7.6.2. Direct enquiries

Based on the explicit voluntary consent of the interested data subject, Indeveyes Technologies will contact these data subjects with advertising material and promotional offers.

The data subject can give his (null) consent through the following channels:

- if there is a contact form on the Website, you may optionally opt-in to consent to marketing enquiries before submitting it;
- verbally if you contact us by phone, but in such cases you will always confirm by email;
- during campaigns, by ticking the box to opt-in to marketing enquiries offered on the website, flyers, etc.

The consent given when submitting the contact form will be sent by email to info@indeveyes.com and will be accessible by the administrator. Indeveyes Technologies will delete the data processed in connection with the enquiries immediately after the enquiry has been dealt with.

The data subject may withdraw his or her consent to the processing for marketing purposes at any time by sending an e-mail to info@Indeveyes.com, in which case Indeveyes Technologies will delete the data subject's personal data from its records.

8. Data transmission

Through agreements with customers and suppliers, Indeveyes Technologies ensures that contracted partners continue to process personal data in accordance with the applicable data protection regulations after the transfer.

Where Indeveyes Technologies transfers personal data to a third country, this will be done if one of the conditions set out in Articles 44-49 of the GDPR is met.

Indeveyes Technologies may be contacted by certain authorities or organisations authorised by law to provide information, data or documents. Indeveyes Technologies will disclose to these authorities or entities, provided that the precise purpose and scope of the data have been specified, only such personal data as is strictly necessary for the purpose of the request and to the extent strictly necessary for the purpose of the request.

9. Data security

Indeveyes Technologies has established and maintains a comprehensive data security system (hereinafter referred to as the "Data Security System") that includes administrative, technical, physical, technical, organizational and organizational measures and safeguards

(including, where appropriate, pseudonymization and encryption) to ensure the confidentiality, security, integrity and availability of personal data and to protect it from unauthorized access, use, disclosure, modification and destruction.

10. Handling data breaches

Indeveyes Technologies, as the data controller, is obliged to notify the NAIH of a data protection incident involving risks to personal data within 72 hours of becoming aware of it.

In the event of an indication of a data breach, Indeveyes Technologies' employees are obliged to notify the authorities. The investigation of the data breach and the filing of a data breach report is the responsibility of the Indeveyes Technologies administrator, in close cooperation with the manager. During the investigation, the administrator will identify the following circumstances:

- the nature of the incident;
- the categories and approximate number of persons concerned;
- the categories and approximate number of data affected by the incident;
- the likely consequences of the data breach.

If it is determined that a data breach has occurred, the administrator will take action to notify the authorities. The administrator shall prepare a plan of action to remedy the data breach, including measures to mitigate any adverse consequences of the data breach.

11. Important contact details

For further information or guidance on data processing by Indeveyes Technologies, please contact the following person directly:

Name: Attila Masa

Email: info@indeveyes.com , Phone: +36 70 613 3842