

Privacy Policy

regarding the use of cookies

I. Name of data controller

Company's Name:	Wash Point Kft.
Adress:	Budapest
Company registration number:	01-09-289712
Tax number:	25798304-2-43
Represents:	Gyebrovsky János

II. Legislation underlying data management

The following legislation applies to data processing:

- Regulation (EU) No 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 text: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>
- Act CXII of 2011 on the right to information self-determination and freedom of information. Act (hereinafter: Info Act), in force: <https://net.jogtar.hu/jogszabaly?docid=A1100112.TV>
- Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activity. law, current text: <https://net.jogtar.hu/jogszabaly?docid=A0800048.TV>
- CLV 1997 on consumer protection. Act, current text: <https://net.jogtar.hu/jogszabaly?docid=99700155.TV>

III. Information on the data processed

Scope of data managed by the data controller: the online ID of the data subject. Legal basis for data processing: Consent of the data subject
Duration of data processing: Until the consent is withdrawn

IV. About cookies in general

- (1) Cookies are short data files placed on the user's computer by the website you are visiting. The purpose of the cookie is to make the given infocommunication and internet service easier and more convenient. There are many varieties, but they can generally be divided into two major groups. One is the temporary cookie that the website places on the user's device only during a specific session (e.g. during the security authentication of an internet bank), the other is the persistent cookie (e.g. the language setting of a website) that remains until then on the computer until the user deletes it. According to the guidelines of the European Commission, cookies [unless they are absolutely necessary for the use of the given service] may only be placed on the user's device with the user's permission.
- (2) In the case of cookies that do not require the user's consent, information shall be provided during the first visit to the website. It is not necessary for the full text of the information on cookies to appear on the website, it is sufficient for the operators of the website to briefly summarize the essence of the information and to indicate the availability of the full information via a link.
- (3) In the case of cookies requiring consent, the information may also be related to the first visit to the website in case the data processing related to the use of cookies starts already with the visit to the website. If the cookie is used in connection with the use of a function specifically requested by the user, the information may also be displayed in connection with the use of this function. In this case, it is not necessary for the full text of the information on cookies to appear on the website, a short summary of the essence of the information and a link to the availability of the full information is sufficient.
- (4) The visitor shall be informed about the use of cookies on the website in the data management information set out in the annex to these regulations. With this information, the Data Controller ensures that the visitor can find out before and at any time during the use of the information society-related services of the website which data types the Data Controller handles, including the handling of data that cannot be directly contacted by the user.

V. Cookies used

The Data Controller informs its Users that it uses Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing to measure traffic to its Website and its subpages, monitor statistics, and track the performance of its ads. The referenced programs on the user's computer are called they place cookies that collect user data. Visitors to the Website (Stakeholders) allow the Data Controller to use Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing. They also consent to the Data Controller monitoring and tracking their user behavior and using all services provided by the programs. In addition, the user has the option to disable the recording and storage of cookies for future reference at any time, as described below.

We would like to inform our users that the settings and use of Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing are fully compliant with the requirements of the Privacy Authority. According to Google, Google Analytics uses a number of first-party cookies to report visitor interactions on your site. These cookies only store non-personally identifiable

information. Browsers do not share their own cookies between domains. You can find more information about cookies in the Google Advertising and Privacy FAQ.

1. *Google Analytics:*

The Data Controller uses Google Analytics primarily to generate statistics, including measuring the performance of your campaigns. By using the program, the Data Controller mainly obtains information about how many visitors have visited your Website and how much time the visitors have spent on the Website. The program recognizes the visitor's IP address, so you can track whether the visitor is returning or a new visitor, and how the visitor has traveled to the Website and where they have entered.

1. *Google Remarketing:*

Using the Google Remarketing program, the Data Controller collects data from the DoubleClick cookie in addition to the usual data from Google Analytics. The DoubleClick cookie allows you to use the remarketing service, which primarily ensures that visitors to your Website will later encounter your Ad Manager ad on free Google ad slots. The Data Controller uses Google Remarketing for its online advertising. Data Manager's ads are also displayed on Internet sites by third-party service providers, such as Google. Data Management and third-party service providers, such as Google, use their own cookies (such as Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) in conjunction with their previous visits to the Website. to optimize and display ads.

1. *Google AdWords conversion tracking:*

Google AdWords Conversion Tracking is designed to help Data Controller measure the effectiveness of your AdWords ads. It does this by using cookies placed on the User's computer, which lasts for 30 days and does not collect personal data.

1. *Facebook Remarketing*

The Data Controller uses the remarketing pixel of Facebook to increase the effectiveness of Facebook ads, so-called to build a remarketing list. This way, after visiting the Website, an external service provider, such as Facebook, may display advertisements on Internet sites. Remarketing lists are not personally identifiable. The visitor's personal information is not included, only the browser software is identified.

1. *Disable cookies*

If you want to manage or disable the cookie settings from your own computer, you can do so in your browser. you can set what tracking features you want to enable / disable on your computer.

Users who do not want Google Analytics to report their visit can install the Google Analytics Disable Browser Extension.

To disable Analytics web activity, visit the Google Analytics Disable page and install the extension for your browser. For more information about installing and uninstalling the extension, see the help for your browser.

VI. Data access and data security measures

1. Access to and transfer of data

The personal data you provide may be accessed by the employees of the Data Controller in order to perform their duties.

The data controller shall transfer the processed personal data to its subcontractors specified in the annex to these regulations.

The Data Controller shall only transfer its personal data to other Data Controllers and state bodies not listed in the Annex only in exceptional cases. Így például, amennyiben

- a court case is pending against you and the court seised needs to provide you with documents containing your personal data,
- the police will contact the Data Controller and request the transmission of documents containing your personal data for the investigation.

1. Data security measures

The Data Controller stores the personal data you provide on the Data Controller's servers and, if applicable, in its paper-based archives. The Data Controller does not use the services of another company to store personal data.

The controller shall take appropriate measures to protect personal data against, inter alia, unauthorized access or alteration. For example, access to personal data stored on the server is logged by the Data Controller, which means that you can always check who, when, what personal data.

VII. Rights of the data subject with regard to data processing

1. Your access rights

You, as the right holder, have access to your personal information.

If you ask the Data Controller to provide feedback on whether you process your personal data, the Data Controller is obliged to provide information on:

- a. what personal information
- b. on what legal basis
- c. for what purpose of data processing,
- d. from what source
- e. how long you treat.

Your right to receive feedback on whether or not the Data Controller handles your personal data

- a. covers personal information about you;
- b. does not cover anonymous data;
- c. does not cover personal information not about you; and
- d. includes pseudonymous information that is clearly associated with you.

The Data Controller will provide access to and a copy of your personal data upon request. If you request an additional / repeated copy of your personal data, the Data Controller may charge a reasonable fee to pay the administrative costs incurred in complying with the request, which fee will be borne by you.

2. Your right to rectify

You have the right to have your personal information corrected.

This right:

- a. does not cover anonymous data;
- b. covers personal information about you;
- c. does not cover personal information not about you; and
- d. includes pseudonymous information that is clearly associated with you.

The Data Controller will correct or supplement your personal data accordingly at your request. The Data Controller will inform the recipients of the personal data (if any) of the correction of your personal data. However, the Data Controller will not inform the recipients of the correction of personal data if it proves impossible or would require a disproportionate effort to inform the recipients.

3. Right of cancellation

Under certain conditions, you have the right to delete your personal data.

The Data Controller is obliged to delete your personal data without undue delay if

- a. the Data Controller handles this personal data, and
- b. You are requesting the deletion of your personal information and
- c. personal data is not required for the purposes for which the Data Controller processes the personal data.

The Data Controller is obliged to delete your personal data without undue delay if

- a. the Data Controller handles your personal data, and
- b. You are requesting the deletion of your personal information and
- c. You withdraw your consent to the processing of your data and
- d. there is no other legal basis for further processing of your data.

The Data Controller is obliged to delete your personal data without undue delay if

- a. the processing is necessary to protect the legitimate interests of the Data Controller or of a third party, and
- b. You object to the Data Controller's handling of your personal data and

c. the legitimate reason for processing such personal data does not take precedence over your protest.

The Data Controller is obliged to delete your personal data without undue delay if

- a. You are requesting the deletion of your personal information and
- b. the processing of such data by the Data Controller is not unlawful, or
- c. cancellation is mandatory under applicable law, or
- d. your data is collected in relation to information society services.

The Data Controller will inform the recipients of the personal data (if any) of the deletion of your personal data. However, the Data Controller will not inform the recipients of the deletion of personal data if informing the recipients would be impossible or would require a disproportionate effort.

4. Your right to restrict your data processing

You may request a restriction on the processing of your personal information.

You have the right to request a restriction on the processing of your personal data

- (a) does not cover anonymous data;
- (b) cover personal data concerning him or her;
- (c) does not cover personal information not about you; and
- (d) includes pseudonymous information that is clearly associated with you.

The Data Controller will restrict the processing of your personal data for the period during which it verifies the accuracy of such data if you request a restriction on the processing of your personal data and you dispute the accuracy of such data.

The Data Controller restricts the processing of your personal data if you request a restriction on the processing of data the processing of which is unlawful and you object to the deletion of such data.

The Data Controller restricts the processing of your personal data if

- (a) You request a restriction on the processing of your personal information, and
- (b) the Data Controller no longer needs such data for the purposes of its data processing, and
- (c) You request your data to file, enforce or defend a legal claim.

The Data Controller restricts the processing of your personal data if

- a. You object to the processing of your personal data which is necessary for the legitimate interests of the Data Controller, and
- b. You are awaiting confirmation that there is a legitimate reason for the processing of your personal data by the Data Controller which does not take precedence over your protest.

The Data Controller will inform the recipients of such personal data (if any) of any restrictions on the processing of your personal data. However, the Data Controller shall not inform the recipients of such a restriction if it would be impossible or disproportionate to inform the recipients.

If the Data Controller restricts the processing of your personal data, then

- (a) store such personal data,
- (b) process such personal data with your consent,
- (c) process personal data in order to make, assert or protect a legal claim or to protect the rights of a person.

5. Right to data portability

You have the right to receive your personal data provided by you to a data controller in a structured, widely used machine-readable format and to transfer this data to another data controller without hindrance (where technically possible). the controller to whom the personal data have been made available, if the processing is based on consent or necessary for the performance of a contract and the processing is carried out in an automated manner.

Your right to data portability

- (a) does not cover anonymous data;
- (b) cover personal information about you;
- (c) does not cover personal information not about you; and
- (d) does not cover clearly pseudonymous data.

6. Deadline for processing your application as a data subject

The Data Controller will respond to your requests for the above rights without undue delay, but no later than within one month.

7. Right to lodge a complaint

If you believe that your rights have been violated, the Data Controller recommends that you initiate a consultation with the Data Controller by contacting the Data Controller directly. If such consultation is unsuccessful or you do not wish to take part in such an action, you may apply to the courts or the NAIH. If you institute legal proceedings, you may decide to bring the proceedings before the court having jurisdiction over your address or place of residence.

The contact details of the NAIH are as follows:

1125 Budapest, Szilágyi Erzsébet fasor 22 / C. ; phone: +36 1 391 1400; fax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; Website: www.naih.hu

8. Amendments to this prospectus

The Data Controller reserves the right to amend this prospectus at any time. The Data Controller shall inform the customers of such changes by letter or e-mail, as the case may be, and in all cases in accordance with the applicable legislation.