

PRIVACY POLICY

28.03.2020

Thank You for choosing us! Our company protects privacy and respects Your rights related to Your personal data.

Present privacy policy (hereinafter as: „**Policy**”) in accordance with the above and with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter as: “**GDPR**”) contains all information regarding the processing of personal data provided by business partners (hereinafter as: „**Partner**”) or visitors of the website (hereinafter as: „**Website**”) under the domain <https://uxstudioteam.com/> of

Company name: **UX studio Zártkörűen Működő Részvénytársaság**

Registered seat: **1052 Budapest, Deák Ferenc tér 3. II. em., Hungary**

Company registration number: **01-10-048628**

Tax number: **25399479-2-41**

Registered by: **Metropolitan Court of Budapest as Court of Registration**

Represented by: **Dávid Pásztor director individually**

E-mail: hello@uxstudioteam.com

(hereinafter: “**Service Provider**”)

and by people contacting the Service Provider through various digital channels and by those who visits us at our office (hereinafter together as: „**Data subject**”).

The aim of this Policy is to give a clear picture on why, how and how long we process the personal data we receive through our Website or from our Partners when concluding an agreement or when someone visits us at our registered seat office or regarding those data we receive through other channels.

I. Some privacy related definitions in order to better understand this Policy

Personal data

means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing

means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Controller

means the natural or legal person, public authority, agency or 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law;

The Controller of Your personal data is the Service Provider.

Processor

means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Third party

means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

Data forwarding

Means the disclosure of personal data to specific third parties;

Data subject

Everybody who shares his/her personal data with the Service Provider through the Website or via other channels or whose personal data is processed by the Service Provider otherwise. For example, You who reads this Policy;

Consent of the data subject

means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Sensitive data

personal data referring to racial origin, nationality, political opinions or membership in any political party, religious or other beliefs, membership of an advocacy organization, sex life, personal data concerning health, pathological data;

Genetic data

means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

Biometric data

means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data;

Personal data breach

means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

Most of the above definitions are the definitions used by the GDPR. The text of the GDPR is available at

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=HU>

The list is not full, should You have any questions, do not hesitate to contact us.

We inform You that during our processing we do not process neither sensitive nor genetic or biometric data and we will never request such data from You.

II. In what cases do the Employer process personal data

In accordance with the principles laid down by Article 5 Section (1) of the GDPR the personal data of the data subject is processed in the following cases:

- Browsing the Website
- Keeping contact during contractual relationship
- Contacting by e-mail or by phone
- Requesting an offer / contacting through the Website
- Training / subscribing to a waiting list
- Making a purchase through the Website
- Invoicing
- Visiting us at our office
- Sub
- Cookies

III. Which data, for which purpose and for how long do we process?

In the cases detailed above the legal ground for processing shall be the following:

- In accordance with article 6 Section (1) Point a) of the GDPR the freely given, specific, informed and unambiguous consent of the Partner (hereinafter as: „**Consent**”);
- In accordance with article 6 Section (1) Point b) of the GDPR processing is necessary for the performance of a contract to which the Partner is party (hereinafter as: „**Performance of Contract**”);
- In accordance with article 6 Section (1) Point c) of the GDPR processing is necessary for compliance with a legal obligation to which the controller is subject (hereinafter as: „**Compliance**”);
- In accordance with article 6 Section (1) Point f) of the GDPR processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (hereinafter as: „**Legitimate Interest**”);

III.1. Browsing

Scope of data processed	Purpose of processing	Legal ground for processing	Naming of the legitimate interest	Duration of processing
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IP address of the Data subject	Protection of the IT systems of the Service Provider and securing the Website	Legitimate interest	Securing the Website	30 days from visiting the Website as latest
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The Website may be freely visited and browsed by anyone without expressly providing any personal data to the Service Provider. However, when visiting the Website at any time, the Data subject's computer or mobile device sends a request to the Service Provider. It is like sending a letter to which You wish to get the content of the Website as an answer. The Service Provider can only answer this request if the Data subject provides his / her address. This address is the Data subject's internet identifier address, IP address for short. The Service Provider sends the requested Website to this IP address. This is an automatic process, by typing the domain of the Website to the web browser or by clicking to a link published anywhere that is directing to the Website the Data subject gives his/her consent to provide the IP address for this purpose and to be processed by the Service Provider. To make this „correspondence” smooth the servers of the Service Provider store the IP address of the Data subject in log files.

The identification and storing of IP addresses is necessary to protect the IT systems of the Service Provider and the Website as well. Protection against possible malicious activities against the Website is partly ensured by that the Service Provider is logging the operation of the Website and in this log, it lists the IP addresses from which requests to its servers were made. If the Service Provider detects an activity from an IP address that interferes with the secure operation of the Website, the address will be blacklisted. Any malicious activity is prevented and resolved through legal action. If nothing unordinary occurs, the Service Provider deletes the log files and the IP addresses. IP addresses stored in log files will not be used by the Service Provider for any other purpose and will be automatically deleted within 30 days and we keep it only if the Data subject has performed any prohibited activity from that IP address. These activities are either listed above or other activities that violate local, state, national or international law.

III.2. Keeping contact during contractual relationship

Scope of data processed	Purpose of processing	Legal ground for processing	Naming of the legitimate interest	Duration of processing
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E-mail address of the contact person designated by the Partner	Keeping contact in order to perform contractual obligations	Legitimate interest	Informing the Partner in order to perform contractual obligations	Until objection against processing or until designating a new contact person but for the purpose of enforcing possible claims until the end of the 5th year from the termination of the contract (end of
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				the limitation period for enforcing claims, Article 6:22. § Section (1) of the Hungarian Civil Code)
First and last name of the contact person designated by the Partner	Keeping contact in order to perform contractual obligations	Legitimate interest	Informing the Partner in order to perform contractual obligations	Until objection against processing or until designating a new contact person but for the purpose of enforcing possible claims until the end of the 5th year from the termination of the contract (end of the limitation period for enforcing claims, Article 6:22. § Section (1) of the Hungarian Civil Code)
Phone number of the contact person designated by the Partner	Keeping contact in order to perform contractual obligations	Legitimate interest	Informing the Partner in order to perform contractual obligations	Until objection against processing or until designating a new contact person but for the purpose of enforcing possible claims until the end of the 5th year from the termination of the contract (end of the limitation period for enforcing claims, Article 6:22. § Section (1) of the Hungarian Civil Code)

If a contractual relationship is established between the Service Provider and the Partner, then the abovementioned personal data of the contact person designated by the Partner is indicated in the contract. In these cases, the legal ground for processing is the legitimate interest of the Service Provider and its purpose is to provide information and other communications to the Partner regarding any issues arising during the contractual relationship. The Partner

acknowledges that it is the Partner's responsibility and liability to obtain consent from the designated contact person to provide his/her data to the Service Provider.

III.3. Contacting by e-mail or phone

In order to provide assistance for existing or future Partners and for any interested parties, and in order to provide information and to enable the enforcing rights (warranties, guarantees) the Service provider makes it available to make contact by e-mail or by phone.

III.3.1. In case of contacting by e-mail:

If the Partner or the Data subject contacts us by e-mail at the address hello@uxstudioteam.com then in order to be able to fulfill requests with proper quality assurance, certain personal data must be processed. Without these, we will not be able to fulfill the requests.

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Partner's contact person or the Data subject	Identifying the Partner's contact person or the Data subject, fulfillment of requests	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.
E-mail address of the Partner's contact person or the Data subject	Identifying the Partner's contact person or the Data subject, fulfillment of requests	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.

III.3.2. In case of contacting by phone:

If the Partner or the Data subject contacts us by phone or if we call back the Partner or the Data subject, then we draw the attention of the Partner or the Data subject that for quality assurance purposes and to fulfill the request the following data will be processed. We inform our Partners and the Data subjects that the phone conversation will not be recorded

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Partner's contact	Identifying the Partner's contact person or the Data subject, fulfillment of requests	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year

person or the Data subject			following the year in which the request was resolved.
Phone number of the Partner's contact person or the Data subject	Identifying the Partner's contact person or the Data subject, fulfillment of requests	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.

III.4. Requesting and offer / contacting through the Website

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Data subject	Contacting the Data subject regarding the offer / question asked	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.
E-mail address of the Data subject	Contacting the Data subject regarding the offer / question asked	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.
Phone number of the Data subject (optional)	Contacting the Data subject regarding the offer / question asked	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.
Location (city or country) of the Data subject (optional)	Making a personalized offer	Performance of contract	Until objection against processing but for quality assurance by 31 st December of the year following the year in which the request was resolved.

In order make it easier and faster to contact us we made a separate contacting form available on the Website. With respect to that we cannot limit the personal data that the Data subject may share with us in the message section of the contact form, we kindly request to only share

the most necessary data and information with us, so please do not share any personal data with our company in your message. In addition, if You think it makes contacting easier, your phone number and if You would like to receive a personalized offer, then Your location is welcomed.

III.5. Training / subscribing to a waiting list

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Data subject	Contacting the Data subject in connection with a training, data necessary for invoicing	Performance of contract	For 30 days after the training was held
E-mail address of the Data subject	Contacting the Data subject in connection with a training,	Performance of contract	For 30 days after the training was held
Phone number of the Data subject	Contacting the Data subject in connection with a training,	Performance of contract	For 30 days after the training was held
Home / Billing address of the Data subject	Contacting the Data subject in connection with a training, data necessary for invoicing	Performance of contract	For 30 days after the training was held

Depending on the number of applicants, the Service Provider holds UX Design Training up to three times a year and once a year a Product Design Course for Data subjects interested in connection with processing of personal data of individuals participating in the training is necessary to ensure their participation in the training, and to share the educational material with them.

If the Data subject could not apply for a training because the capacity is full, the he / she has the possibility to subscribe to a waiting list, in which case the Service Provider will notify the Data subject if a place becomes vacant. The Service Provider notifies the subscribed Data subjects in the order of subscribing. For subscription the processing of the following personal data is necessary:

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Data subject	Sending notification about vacancy	Consent	Until withdrawing consent, but until the starting date of the training as latest

E-mail address of the Data subject	Sending notification about vacancy	Consent	Until withdrawing consent, but until the starting date of the training as latest
Phone number of the Data subject	Sending notification about vacancy	Consent	Until withdrawing consent, but until the starting date of the training as latest
Workplace and position of the Data subject (optional)	Sending notification about vacancy	Consent	Until withdrawing consent, but until the starting date of the training as latest

III.6. Making a purchase through the Website

The Service Provider sells a product design book on the Website, which the Data subject may purchase through the Website. The processing of the following personal data is required for the purchase and for the performance by the Service Provider.

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Data subject	Identifying the Data subject, data necessary for delivery and receipt	Performance of contract	2 years from the delivery and receipt in accordance with Article 6:163 of Act V of 2013 on the Civil Code
E-mail address of the Data subject	Sending feedback and information to the Data subject regarding the purchase	Performance of contract	Until sending feedback about the purchase
Phone number of the Data subject (optional)	Identifying the Data subject, fulfillment of delivery	Performance of contract	Until fulfillment of delivery
Home or delivery address / Billing address of the Data subject	Identifying the Data subject, data necessary for delivery and receipt and for invoicing	Performance of contract	2 years from the delivery and receipt in accordance with Article 6:163 of Act V of 2013 on the Civil Code

III.7. Invoicing

III.7.1. If the invoice about any service or product is issued for a legal entity, then the Service Provider process the personal data found below

Scope of processed data	Purpose of processing	Ground for processing	Naming of Legitimate interest	Duration of processing
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E-mail address of the contact person designated by the Partner / Data subject	Keeping contact with the Partner / Data subject in connection with invoicing	Legitimate Interest	Sending the invoice to the Partner / Data subject to be issued mandatorily by the Service Provider in accordance with the law	Until the last day of the 5th year following the year in which the contract was terminated
First and last name of the contact person designated by the Partner / Data subject	Keeping contact with the Partner / Data subject in connection with invoicing	Legitimate Interest	Identifying the Partner / Data subject in connection with the invoice to be issued mandatorily by the Service Provider in accordance with the law	Until the last day of the 5th year following the year in which the contract was terminated

The Service Provider only processes the e-mail address as personal data in the case if the e-mail address of the contact person contains the name of a natural person. If the contact e-mail address is general (e.g. info@example.com or finance@example.com) then the Service Provider process the data but it shall not be considered as personal data. The Service Provider draws the Partner's and the Data subject's attention that if the e-mail address contains the name of a natural person the consent of the contact person to provide such data shall be obtained by the Partner / the Data subject.

III.7.2. If the invoice about any service or product is issued for a natural person then the Service Provider process the personal data found below

Scope of processed data	Purpose of processing	Ground for processing	Duration of processing
First and last name of the Data subject	Data mandatorily to be recorded in the issued invoice	Compliance	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting
Home / billing address of the Data subject	Data mandatorily to be recorded in the issued invoice	Compliance	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting

E-mail address of the Data subject	Keeping contact with the Data subject in connection with invoicing	Compliance (Article 6 Section (1) Point c) of the GDPR)	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting
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The mandatory content of the invoice and the duration of processing is prescribed by law therefore the Service Provider processes these in order to comply with its legal obligation.

III.8. Visiting us at our office

Scope of data processed	Purpose of processing	Legal ground for processing	Naming of the legitimate interest	Duration of processing
The image of the Data subject	Identifying the data subject	Legitimate interest	Security and property protection purposes and to prevent unauthorized access	Until objection against processing but for 72 hours from the visit as latest

If someone would like to visit us at our office then because there is a camera installed in the office building which contains our office and because there is a reception service at the office building the image of the Data subject will be recorded and some additional data may be required by the reception. With respect to that the office building managed, the camera operated, and the reception service is provided by a company that is independent of us, we have no control over the scope of data requested. In this case, the management of the office building and the reception service is considered to be the controller of personal data.

III.9. Newsletter subscription

The Data subject may subscribe to our newsletters. There are several ways to do this. Through the Website. In connection with this, the Service Provider processes the Data subject's e-mail address under the explicit consent of the Data subject until he / she withdraws this consent. There are several ways to withdraw consent, for more details, see Section VI of present Policy.

Scope of processed data	Purpose of processing	Ground for processing	Duration of processing
E-mail address of the Data subject	Sending informative and educational messages to the Data subject	Consent	Until the withdrawal of consent i.e. unsubscribing from the newsletter

First and last name or nickname of the Data subject (optional)	Sending informative and educational messages to the Data subject	Consent	Until the withdrawal of consent i.e. unsubscribing from the newsletter
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IV. What are cookies and why we use them?

Cookies are data packages that are sent by our web servers to Your computer automatically, where they are stored – depending on the type of the cookie – for a definite period of time.

Cookies do not hold any security risk to Your computer or not cause any malfunction.

In order to ensure the smooth operation of the Website, certain cookies (known as session cookies) are automatically installed on Your computer when You visit the Website. The purpose of such cookies is to ensure the security of the Website, to preserve the data recorded on our online forms, to display multimedia content and to balance the traffic on the Website. Personal data collected through the use of these cookies (in particular the IP address of Your computer) will be processed for our legitimate interest in the safe and smooth operation of the Website for the duration of Your stay on our Website. Closing Your browser will automatically delete them from Your computer.

With Your consent given on the Website, the following types of cookies may be installed on Your computer for the following purposes:

- Cookies for web analytical measurements and for statistical purposes (e.g. Google Analytics). These are important to us because we are provided with information about the specific characteristics of our visitors (IP address, city, type of device, browser, operating system You are using, and what sub-pages You have visited on our site). We use these data anonymized for statistics and reports to improve the Website our marketing strategy.
- Remarketing cookies (such as Google AdWords) allow us to analyze how You use our site and, consequently, to display personalized content to You, including advertising on online platforms outside our site (e.g. other websites or social media).

In addition, we distinguish between session-specific cookies and persistent cookies. A cookie valid for a single session only survives until the Data subject closes the browser. Permanent cookies continue to live and are not automatically deleted when You close Your browser. Why do they stay there and what's good about it? Well, such persistent cookies, for example, help to make the site run faster and remembering things that the Data subject has set for himself/herself on the Website.

You can manage cookies in Your browser's settings. How these settings are set depends on the type of Your browser.

You may find information on cookie settings for the most popular browsers on the following link:

- Google
Chrome: https://support.google.com/chrome/answer/95647?hl=hu-hu&p=cpn_cookie_s
- Firefox:
<https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalnak-tarolnak-szami>
- Internet
Explorer: <https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/hu-hu/HT201265>

The Service Provider uses the following cookies on the Website:

Name of the cookie	Type of cookie	Function of the cookie

V. Where and how do we process personal data?

Personal data is processed on paper or electronically. If the data is processed on paper (for example, in the case of contractual data), it will be placed in a secluded location. Data is stored electronically on cloud-based servers.

The Service Provider takes all necessary technical and organizational measures and precautions to protect personal data and the quality thereof and providing continuous physical and procedural protection which complies with the data protection regulations, for example the servers are at a locked place and the computers are protected by passwords and firewalls.

Notwithstanding the above, the Service Provider shall not be liable for any damage, destruction or unauthorized access to the data in the event of technical error, natural disaster, terrorist or criminal act.

VI. How can one withdraw consent if the ground for processing is based on consent?

If under present Policy the legal ground of processing is the Data subject's consent, then the Data subject has the right to withdraw this consent. Depending on the purpose of processing there are many ways to do it. You may withdraw Your consent given at browsing at any time, free of charge and without limitation by revisiting the Website and clicking on the pop-up window. In addition, if You do not have the possibility to withdraw Your consent this way, you may withdraw it by sending a message to hello@uxstudioteam.hu or in case of newsletter

subscription by clicking on the "unsubscribe" button at the bottom of the email or by sending a letter to the Service Provider's registered seat address.

Please note that the withdrawal of consent does not affect the legality of the processing prior to the withdrawal.

VII. Your rights related to processing of Your personal data

Request for information (right to access): You may request information about the processing of Your personal data at any time, either in person, at our registered seat address, in writing by sending a registered letter or by email to hello@uxstudioteam.com

Pursuant to Article 15 Section (1) of the GDPR, a request may include information on the data processed, their source, purpose, legal ground, duration, name and address of any processor, processing activities and Your rights in relation to processing. In the case of data transfer, to whom and for what purpose Your data have been or will be transferred.

A request for information is considered authentic by us if You are clearly identified by it. If the request is sent by e-mail or post, only the e-mail sent from Your registered e-mail address will be considered as authentic, and we will only be able to send information to the postal address registered by us. Unless You voluntarily verify Your identity otherwise, we will not be able to send information to an e-mail address or postal address that is not registered in our records in order to protect Your privacy.

Rectification: You may at any time request the rectification, modification or amendment of Your data in the same manner described above. We can also do this only on the basis of a request from a credible source presented when submitting the request.

Restriction: You may request that we restrict the processing of our personal information in particular if:

- a) You argue the accuracy of the personal data we process. In this case, the limitation refers to the period during which the accuracy of the data is checked.
- b) Although the legal ground for processing does not stand for us, but You are requesting us in writing to keep them for the purpose of filing, asserting or defending any legal claim You may have

Objection: If we process Your personal data on the ground of legitimate interest, You may at any time object to the processing of Your personal data. In such cases, we will review the legality of the objection and, if it is well established, we terminate the processing of data and notify anyone to whom the personal data subject to the objection may have been previously transmitted.

Deletion ("Right to be forgotten"): You may request the deletion of Your personal data at any time for any of the reasons set out in Article 17 Section (1) of the GDPR.

We may refuse deletion if the processing of Your personal data is required by law or if it is necessary to enforce our legal claims. We will always inform You about the refusal of the request for deletion. Once it is deleted, the data cannot be recovered.

Transfer of Personal Data (Portability): You may at any time request us to transfer the data processed in connection with You in a structured, widely used, machine-readable format to You or to another controller.

We kindly ask You to not exercise the above rights improperly, but only if it has a real ground or if any of the conditions set out in the GDPR actually exist.

VIII. To whom we transfer personal data and who has right to access them?

Except as provided below, your personal data will be kept confidential and will not be disclosed to any third party.

VIII.1. Data forwarding in connection with contractual relationships

VIII.1.1. If the Service Provider stores the contracts concluded with Partners and the Data subjects and therefore the personal data contained therein electronically, then it uses Google Drive which is provided by:

- Company name: **Google Ireland Ltd**
- Registered seat: **Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland**
- Registration number: **368047**
- Represented by **Elizabeth Margaret Cunningham director**
- Phone: **+353 1 436 1000**
- Server location: **Dublin, Ireland**

(hereinafter as: “**Google**”)

Google processes EU related data within the territory of the European Union through its servers located in Dublin, Ireland. Google may not access, modify, delete, use or otherwise manipulate the Applicant related data stored on the server provided by Google.

Google provides the protection of data on multiple levels, such as physically protecting data storage servers, which are secured and supervised by security guards and technicians, it restricts access to server rooms by its employees and by providing uninterruptible power supply and other state-of-the-art infrastructure, restricting access to data, continuously monitoring its system, encryption and firewall protection. The Google Privacy Policy is available at <https://policies.google.com/privacy/frameworks>.

VIII.1.2. If the Service Provider concludes the contract with the partner or the Data subject electronically then the Service Provider uses a third-party application named HelloSign. HelloSign is provided by:

- Company name: **JN Projects Inc.**
 - Registered seat: **333 Brannan Street San Francisco, CA 94107, United States of America**
 - Registration number: **001401137**
 - Represented by: **Jospeh H. Walla director**
 - E-mail: legal@hellosign.com
- (hereinafter as: “**HelloSign**”)

HelloSign is a limited liability company registered and operating in the United States of America. Shall HelloSign forward data to servers located outside the territory of the European Union, namely to the United States of America the data of the Applicant is safe and is under the same protection as it is within the EU because HelloSign is a Privacy Shield certified organization. Privacy Shield is an agreement between the European Union and the United States of America that ensures that processing of data by HelloSign in the US complies with the GDPR
(<https://www.privacyshield.gov/participant?id=a2zt0000000TSqHAAW&status=Active>)

HelloSign's privacy policy is available at <https://www.hellosign.com/privacy>

VIII.2. Data forwarding related to contacting us through the Website

VIII.2.1. The Service Provider manages the data received by the Data subjects through the contacting form placed on the Website with Google Sheets provided by Google. For Google Sheets the provisions of section VIII.1.1. shall be applied.

VIII.2.2. The forms received through Google Sheets is stored by the Service Provider in the CRM system named Pipedrive which is provided by:

- Company name: **Pipedrive OÜ**
- Registered seat: **Mustamäe tee 3a, Tallinn, 10615, Estonia**
- Registration number: **11958539**
- Tax number: **EE101382096**
- Represented by **Timo Rein director**
- E-mail: dpo@pipedrive.com, support@pipedrive.com
- Phone: **+37 2577 04478**
- Server location: **Frankfurt, Germany**
(hereinafter as: "**Pipedrive**")

Pipedrive's privacy policy may be reached through this link
<https://www.pipedrive.com/en/privacy>

VIII.3. Data forwarding related to training

The Service Provider manages the data received by the Data subjects in connection with application and subscribing to a waiting list also with Google Sheets for which also the provisions of section VIII.1.1. above shall be applied.

VIII.4. Data forwarding related to purchases made through the Website

VIII.4.1. To manage transactions the Service Provider uses the webshop engine named Shopify which is provided by:

- Company name: **Shopify International Limited**
- Registered seat: **2nd Floor Victoria Buildings, 1-2 Haddington Road, Dublin 4, D04 XN32, Ireland**
- Registration number: **560279**
- Tax number: **IE 3347697KH**

- Represented by: **Joseph Andrew Frasca, Russel Norman Jones and Lelia O’Shea directors**
 - E-mail: privacy@shopify.com
- (hereinafter as: „Shopify”)

All Shopify servers are located in the European Union (Ireland) and personal data stored on them may not be accessed from a third country except as noted in this Policy. The parent company of Shopify is a company incorporated under the laws of Canada and if Shopify transmits any data to its parent company, in the opinion of the European Commission it is in accordance with the provisions of the GDPR.

Shopify ensures the protection of data on multiple levels, physically protecting data storage servers by placing them at a secluded location which is protected by security guards and monitored by technicians 24/7 and all 365 days of the year and by limiting access to servers among its employees, it uses access system to the servers and protects its infrastructure through uninterruptible power supplies in order to avoid power shortages and other advanced tools, limiting access to data, using firewalls, continuous monitoring of its system and when transmitting data it uses encryption. More information about Shopify's security solutions is available at <https://www.shopify.com/security>

You may find Shopify’s privacy policy here: <https://www.shopify.com/legal/privacy#values>

VIII.4.2. The Service Provider stores the books available for purchase in the warehouses of the service provider named Webshippy, and the delivery is also carried out by the same, and the contact details of which are:

- Company name: **WEBSHIPPY Magyarország Logisztikai és Szállítványozási Korlátolt Felelősségű Társaság**
- Registered seat: **1044 Budapest, Ezred utca 2. B2. ép. 13., Hungary**
- Company registration number: **01-09-282775**
- Tax number: **25569421-2-41**
- Represented by: **András Perényi managing director individually**
- E-mail: info@webshippy.com
- Phone: **+36 1 99 88 099**

(hereinafter as: “Webshippy”)

In order to fulfill orders Webshippy has access to the Service Provider’s Shopify account.

Webshippy’s privacy policy is available at: <https://webshippy.com/adatkezelesi-tajekoztato/>

VIII.4.3. Data forwarding related to payments

The payments made in connection with purchases made through the Website is processed by a third-party payment solution provider, which is:

- Company name: **PayPal Holdings Inc.**
- Registered seat: **2211 North First Street, San Jose, CA 95131, United States of America**
- Registration number: **C3842984,**
- Represented by **Daniel H. Schulman director**

- E-mail: dpo@paypal.com
- Phone: +1 408 967 7400
- Fax: +1 302 655 5049
- European correspondence address: **PayPal (Europe) S.à r.l. et Cie, S.C.A. (registered seat: 22-24 Boulevard Royal L-2449, Luxembourg, registration number: B118349, phone: +352 2663 9100, fax: +352 2663 9250)** (hereinafter as: „PayPal”)

The Service Provider informs the Data Subject that payment data is not stored, managed or anyhow processed by the Service Provider. The Service Provider will receive only a payment feedback from PayPal. The Data Subject shall provide their payment information on the Website directly to PayPal through the software plug-in built into the Website. More information about PayPal is available at www.paypal.com.

PayPal’s privacy policy is available at: <https://www.paypal.com/hu/webapps/mpp/ua/privacy-full>

VIII.5. Data forwarding related to invoicing

The Service Provider issues its invoices with one of Hungary's largest online billing system, szamlazz.hu. If the data subject provides his / her own data as billing data, then as described above, since it is considered as personal data it is subject to processing by the Service Provider. Operator of szamlazz.hu website as our processing partner is:

- Company name: **KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság**
- Registered seat: **1031 Budapest, Záhony utca 7., Hungary**
- Company registration number: **01-09-303201**
- Tax number: **13421739-2-41**
- E-mail: info@szamlazz.hu
- Represented by: **Balázs Ángyán as managing director**

(hereinafter as: „KBOSS”)

KBOSS has a privacy policy complying with the GDPR which is available at: <https://www.szamlazz.hu/adatvedelem/>

VIII.6. Data forwarding related to accounting

To the below company performing accounting services for the Service Provider:

- Company name: **INTENTOR Könyvelőiroda Szolgáltató Korlátolt Felelősségű Társaság**
- Registered seat: **1142 Budapest, Ungvár utca 39., Hungary**
- Company registration number: **01-09-913183**
- Tax number: **14642010-2-42**
- Represented by: **Nóra Virág Kovács and Dénes Kulcsár managing directors individually**
- E-mail: iroda@konyveled.hu

VIII.7. Data forwarding for the purpose of enforcing claims

If the Service Provider wishes to enforce a legitimate claim, it may transmit documents containing personal data. The Service Provider is entitled to transfer personal data to a legal representative, authority or court for the purpose of raising and / or enforcing a claim.

VIII.8. Data forwarding related to newsletter subscriptions

The Service Provider uses the service named Drip to send its newsletters, the provider of which may be contacted at:

- Company name: **DRIP GLOBAL (UK) LTD,**
- Registered seat: **9th Floor, 107 Cheapside, London, EC2V 6DN, United Kingdom**
- Registration number: **11324538**
- Represented by: **John Tedesco director**
- E-mail: privacy@drip.com

(hereinafter as: „Drip”)

The privacy policy of Drip is published at <https://www.drip.com/privacy>

VIII.9. Access to personal data by the reception and the management of the office building

At the office building where the Service Provider’s office is located there is a CCTV system and also reception service. When entering the office building the image of the Data subject may be recorded and the reception may request personal data from the Data subject.

The management of the office building may be contacted at:

- Company name: **Mozsár Trade Center Ingatlankezelő Bt.**
- Registered seat: **1066 Budapest, Mozsár utca 16.**
- Company registration number: **01-06-729791**
- Tax number: **20602082-2-42**
- Represented by: **Dr. Walter Henss and Enikő Bokor managing directors individually**
- E-mail: info@mozsartc.hu

The reception service is provided by a company that is independent from us and whose contact details are the following:

- Company name: **HIGH SECURITY Távközlési és Biztonságtechnikai Korlátolt Felelősségű Társaság**
- Registered seat: **1138 Budapest, Toborzó utca 2., Hungary**
- Company registration number: **01-09-171856**
- Tax number: **12741340-2-41**
- Represented by: **Attila Srankó and Zoltán Hersics managing directors individually**
- E-mail: contact@hisec.hu
- Phone: **+36 1 460 0187**

As regards the data processed by the reception, the Service Provider has no control over the scope of the data processed and how it is processed, the reception is considered as controller.

IX. What third-party social media plug-ins may be found on our Website?

To receive feedback on the contents we share on the Website and to share them we use social media sites meaning we use the services (plugins) of third-party providers. The plugins are only active when You specifically click on the button to allow them to contact social media sites. The plugins of the following two social media sites can be found on our website: Facebook, Twitter, LinkedIn, Tumblr, Instagram, YouTube, Behance, Dribbble.

If You are logged in to any of these sites it may occur that Your visit on the site will be attached to Your personal profile. If you click on the specific button, your browser will forward the relevant information directly to that social media site and store them there.

Information about the scope and purpose of the data collected, further processing of Your data and use of Your data by the social media provider, and Your rights regarding personal data can be found in privacy statements of the social media providers, which are available at:

Facebook: <https://www.facebook.com/policy.php>

Twitter: <https://twitter.com/en/privacy>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Tumblr: https://www.tumblr.com/privacy/en_eu

Instagram: <https://help.instagram.com/402411646841720>

YouTube: <https://policies.google.com/privacy>

Behance: <https://www.adobe.com/privacy.html>

Dribbble: <https://dribbble.com/privacy>

X. To whom and in what cases are we required to disclose personal data?

We may be requested to disclose personal data we process to authorities upon request. Our company cannot be held liable for any such transfer or any resulting consequences. We will always inform You about the transfer.

XI. What are the responsibilities with regard to the personal data You provide?

When You provide us Your personal data, You are responsible for ensuring that the information and contributions You make are true and correct.

We ask You to provide us third-party data only if specifically authorized to do so by the third party. Our company assumes no liability for any resulting claims.

If a third-party object the processing of personal data by credibly verifying his / her identity, we will immediately delete third-party data without notifying You. Please only provide third-party personal data only if you have informed the third party of the availability of this Policy.

Please do not provide any additional personal data other than the ones requested by the Service Provider under Section III. above. Should You provide any additional personal data to which was requested, then the Service Provider immediately makes them unrecognizable and irrevocably deletes them, furthermore the Service Provider excludes all liability for unsolicited personal data which was provided without the Service Provider's request.

XII. Management of Personal data breach

Any personal data breach that may occur will be reported to the supervisory authority within 72 hours from becoming known to us in accordance with the law, and we will also maintain records of any breach that may occur. In the cases specified by law, we also inform the Employees concerned.

XIII. Data Protection Officer (DPO)

Pursuant to Article 37 of the GDPR appointment of a DPO is mandatory if:

- a) the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
- b) the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or
- c) the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10.

With respect to that the Service Provider is not subject to any of the clauses above and because there is no other compelling reason to appoint a DPO we are not appointing anyone for this position.

XIV. Amendment of the Privacy Policy

If the scope of the processed data, the legal ground of the processing or other circumstances change, this Policy will be amended and published in accordance with the provisions of the GDPR within 30 days from the amendment. Please be sure to read the Privacy Policy changes carefully as they contain important information about the processing of Your personal data.

XV. Whom can You turn to for information in connection with Your personal data or to exercise Your rights against?

With Your questions related to personal data processing and the rights related thereto contact us at hello@uxstudioteam.com by e-mail or by post at 1052 Budapest, Deák Ferenc tér 3. II. em., Hungary.

The data subject is entitled to exercise his / her rights related to the processing of personal data against the Service Provider as controller. If the subject wishes to exercise his / her rights, he / she must notify the Service Provider first.

If You feel that Your rights have been violated, You may make a complaint at the National Authority for Privacy and Freedom of Information:

Name: **National Authority for Privacy and Freedom of Information**

Address: **1125 Budapest, Szilágyi Erzsébet fasor 22 / C., Hungary**

Mailing address: **1530 Budapest, PO box: 5., Hungary**

Phone: **+36 1 391 1400**

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>