

DATA PRIVACY
AND DATA PROCESSING NOTICE

W5 IT LIMITED LIABILITY COMPANY
(7678 Abaliget, Kossuth Lajos street 12.)

Abaliget, 10.09.2021.

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I. PRESENTATION OF THE DATA PROCESSOR

To ensure the legality of its internal data management processes and the rights of the data subjects, the **W5 IT Limited Liability Company** (hereinafter: Company, Data Manager, or "We") creates the following data protection information.

Name of the data controller: **W5 IT Limited Liability Company**
Trade Register Number of the Data Controller: **Cg. 02-09-072933**
Registered Office of the Data Controller: **7678 Abaliget, Kossuth Lajos street 12.**
Tax Identification Number of the Data Controller: **14432945-2-02**
Email Address of the Data Controller: **privacy(at)w5labs.com**
Representative of the Data Controller: **Zoltán Csepregi managing director**

Our company processes personal data in accordance with all applicable legal provisions, primarily the following regulations:

- CXII of 2011 on information self-determination and freedom of information. law (hereinafter Info. tv.),
- 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 flow of such data, and on the repeal of Directive 95/46/EC (General Data Protection Regulation) (hereinafter: Regulation or GDPR).

Our company handles personal data confidentially and takes all necessary technical and organizational measures related to data storage and processing to ensure the preservation and secure management of the data.

Our company has created this information notice for the purpose of presenting the objectives and characteristics of personal data processing related to visiting the website <https://w5labs.com> and using the services provided by the website, as well as informing the data subjects.

II. DEFINITONS

Data Controller: any 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 (unless otherwise specified in this Data Processing Information, the Data Controller refers voluntarily, explicitly, and unambiguously to W5 IT LLC. according to the voluntary, specific, informed statement, declaration, or unambiguous action by the data subject indicating his or her consent to the processing of his or her personal data);

Supervisory Authority or NAIH: the National Authority for Data Protection and Freedom of Information;

Third Party: any natural or legal person, public authority, agency, or other body other than the data subject, the data controller, the data processor, and the persons who, under the direct

authority of the data controller or data processor, are authorized to process personal data.

Profiling: any form of automated processing of personal data or set 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 of personal data, that aims to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning the individual's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location, or movements;

Personal Data: 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;

Special Categories of Personal Data: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

Client: individuals personally interested in the products and services of the data controller, inquiring through the website, by phone or any other means, as well as those entering into a contract or establishing a legal relationship with the data controller.

III. CHARACTERISTICS OF INDIVIDUAL DATA PROCESSING PURPOSES

1. Cookie management on the website

In order to maintain and develop the services of the website <https://w5labs.com>, as well as to enhance the user experience, the so-called we use cookies.

What is a cookie?

Cookies are small text files placed on the user's device by the browser for identification and information collection. The cookie consists of a unique sequence of numbers and is primarily used to distinguish computers and other devices that download the website. Cookies have several functions, including collecting information, remembering user settings, and giving the website owner the opportunity to learn about user habits to increase the user experience. We use cookies on our website for the following purposes:

- development of our pages,
- session cookies,
- analytical cookies,
- spam protection cookies,
- performance cookies,
- creating and analysing web analytics on how visitors use the website,
- increase user experience,
- navigation on our pages and thereby facilitating the use of the website,
- obtaining information about user habits,
- placement of targeted advertisements.

What cookies does the website use?

We provide the following information about the cookies used by the website:

Cookie name	Data managed by Cookies	Cookie lifetime	Cookie function, purpose of data management
Google Analytics code <code>_ga</code>	Data for distinguishing users, the data controller does not manage personal data.	2 years	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in every page request of the website and is used to calculate visitor, session and campaign data for website analytics reports.
Google Analytics code <code>_gid</code>	Data for distinguishing users, the data controller does not manage personal data.	24 hours	This cookie is set by Google Analytics. Each page visited stores and updates a unique value and is used to count and track page views.
Google Analytics code <code>_gat</code>	Data for distinguishing users, the data controller does not manage personal data.	1 minute	This cookie is part of Google Analytics and is used to limit requests.
Hotjar codes (details available under the Hotjar link)	User behavioural data.	365 days, session, 30 minutes, 100 seconds	Collects data about user behaviour

More information about third-party cookies is available at the following links:

Google Analytics:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>

Hotjar: <https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookies>

The website does not sell, rent or distribute the information collected by cookies to third parties other than as written in the cookie manager, except to the extent necessary to provide the services for which the data subject has previously and voluntarily given his consent.

Legal basis for the data management implemented by cookies?

We use cookies that are essential for the operation and use of the site based on our legitimate interest according to Article 6 (1) point f) of the GDPR, the legal basis for the use of additional cookies is the consent of the data subject, which can be given through the cookie manager.

How can you check and disable cookies?

Through the consent manager, previously given consent can be revoked in any case.

In addition, all modern browsers allow changing the cookie settings. Most browsers automatically accept cookies by default, but these can usually be changed to prevent automatic acceptance and offer you a choice each time whether or not to allow cookies.

Since the purpose of cookies is to facilitate or enable the usability and processes of the website, by preventing or deleting the use of cookies, users may not be able to fully use the website's functions, or the website may function differently in their browser than intended.

You can find information about the cookie settings of the most popular browsers at the following links:

Google Chrome

<https://support.google.com/accounts/answer/61416>

Firefox

<https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalak-tarolnak-szami?redirectlocale=hu&redirectslug=S%C3%BCtik+kezel%C3%A9se>

Microsoft Edge

<https://support.microsoft.com/hu-hu/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

Microsoft Internet Explorer

<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>

Opera

<https://help.opera.com/en/presto/browser-behavior/#cookies>

Safari

<https://support.apple.com/hu-hu/HT201265>

2. LinkedIn profile sending

In today's digitized world, almost everyone maintains their professional profile on LinkedIn. Through our careers page, we provide our visitors with the opportunity to send us their LinkedIn profile.

During electronic communication with the data subject, we handle your personal data as described in this information.

Purpose of data management

The purpose of data management is to check the professional background of the interested party, based on the LinkedIn profile sent by him. Data entered on LinkedIn is not stored by the Data Controller, the data contained there is subject to LinkedIn's data management rules.

(More details: <https://www.linkedin.com/legal/privacy-policy>)

Personal data handling

Name, e-mail address, as well as any other information that the data subject considers important during the contact initiated by the data subject. In the case of making contact or applying for a job, the person concerned has the opportunity to voluntarily provide his telephone number if he wishes to be contacted directly by telephone.

Legal basis for data management

The legal basis for processing personal data is Article 6 (1) point b) of the Regulation, so data processing is necessary to fulfil a contract (obligation) in which the data subject is one of the parties, or it is necessary to take steps at the request of the data subject prior to the conclusion of the contract. The Data Controller considers the communication with the data subjects to be preliminary data processing related to an employment contract (agreement) to be concluded later.

In addition, point f) of Article 6 (1) of the Regulation (legitimate interest) also gives the Data Controller a legal basis for data management. It is the Data Controller's legitimate interest to process personal data necessary for a response if contacted in a matter.

Source of personal data

Personal data is provided directly by the data subject to the Data Controller.

Recipients of personal data made available

Only those employees of the Data Controller who have the authority to propose or make decisions in connection with the message sent by the data subject or the administration required based on it are authorized to handle personal data.

Transfer of personal data to a third country or to an international organization

The Data Controller does not forward the above personal data of the data subject either to a third country or to an international organization.

Duration of processing personal data

The message(s) between the Data Controller and the data subject will be deleted by the Data Controller after the termination of the communication or at the request of the data subject.

Automated decision-making and profiling

None of this happens during data management.

Service of personal data

The processing of personal data is a condition for answering the message, and thus for communication between the data subject and the Data Controller.

3. Data management related to electronic communication

In today's fast-paced world, we primarily communicate with our users, customers, partners, and clients electronically. Anyone can contact our company directly by e-mail, be it a request for a quote, a request for information, technical questions, or any other topic.

In the course of electronic communication with the data subject - related to any case - we handle your personal data as described in this information sheet.

Purpose of data management

Electronic communication, response to consumer inquiries. The data provided by the data subject is handled solely for the purpose of communicating with him or handling the contents of the message. The data subject has the right to contact our Company electronically in any matter.

The Data Controller initiates contact with any data subject only in connection with the fulfillment of an existing contract or with other legal grounds, in compliance with the rules on data protection.

Personal data handled

Name, e-mail address, and all other information that the data subject considers to be relevant in the matter initiated by the data subject. In the event of a contact or a request for an offer, the person concerned has the option of voluntarily providing their telephone number, if they wish to be contacted directly by telephone with our answer.

Legal basis for data management

The legal basis for processing personal data is Article 6 (1) point b) of the Regulation, so data processing is necessary to fulfil a contract (obligation) in which the data subject is one of the parties, or it is necessary to take steps at the request of the data subject prior to the conclusion of the contract. The Data Controller considers the communication with the data subjects to be preliminary data management related to a contract (agreement) to be concluded later, or data management related to an already concluded contract.

In addition, point f) of Article 6 (1) of the Regulation (legitimate interest) also gives the Data Controller a legal basis for data management. It is the Data Controller's legitimate interest to process personal data necessary for a response if contacted in a matter.

Source of personal data

The affected.

Recipients of personal data made available

Only those employees of the Data Controller who have the authority to propose or make decisions in connection with the message sent by the data subject or the administration required based on it are authorized to handle personal data.

Transfer of personal data to a third country or international organization

We do not transfer personal data to third countries or international organizations.

Duration of processing personal data

If a contract (obligation) of any kind is established between the Data Controller and the data subject, personal data obtained during communication will be processed in connection with the given contract, at most until the expiration of the statute of limitations.

If no contract or agreement is concluded between the Data Controller and the data subject after the data management prior to the conclusion of the contract, the Data Controller will delete your message(s) after the communication has been terminated.

Automated decision-making and profiling

None of this happens during data management.

Service of personal data

The processing of personal data is a condition for answering the message, and thus for communication between the data subject and the Data Controller.

4. Logging during service operation

Purpose of data management

During the operation of IT systems, it is essential to ensure the security of the system and the smooth activity of users, for which we log the events on the website and in the software. The further purpose of this is to ensure uninterrupted operation, as well as to detect and prevent malicious attacks against the site, as well as their subsequent detection, as well as to help protect against further such incidents.

Personal data handled

The IP address of the visitor, the time of the visit and the address of the page he reached.

Legal basis for data management

The legal basis for the processing of personal data is the legitimate interest according to Article 6 (1) point f) of the Regulation, which is defined in the purpose of data management.

Source of personal data

The affected.

Recipients of personal data made available

Only those employees of the Data Controller who have the right to propose or make decisions in connection with the message sent by the data subject or the administration required based on it are entitled to know the personal data.

Transfer of personal data to a third country or international organization

We do not transfer personal data to third countries or international organizations.

Duration of processing personal data

Log files are kept for 2 years.

Automated decision-making and profiling

None of this happens during data processing.

Service of personal data

The management of personal data is a condition for visiting the website and using the service.

IV. RIGHTS OF THE DATA SUBJECT RELATED TO DATA PROCESSING

Right to information

The data subject has the right to information related to data management, which the Data Controller fulfils by providing this information.

Data management based on consent

If the legal basis of any data processing is the data subject's consent, he is entitled to withdraw his previously given consent to data processing at any time. However, it is important to know that the withdrawal of consent can only apply to data that has no other legal basis for its processing. If there is no other legal basis for processing the personal data concerned, in that case, after the withdrawal of consent, the personal data will be permanently and irreversibly deleted. Withdrawal of consent based on the Regulation does not affect the legality of data processing carried out on the basis of consent prior to the withdrawal.

Access right

At the request of the data subject, the Data Controller will inform you at any time later whether their personal data is being processed and, if so, will provide access to the personal data and the following information:

- a) the purposes of data management;
- b) categories of personal data concerned;

- c) recipients or categories of recipients to whom or to whom the Data Controller has disclosed or will disclose the personal data, including in particular third-country recipients and international organizations;
- d) the planned period of storage of personal data, or if this is not possible, the criteria for determining this period;
- e) we also inform you of your right to request from the Data Controller the correction, deletion or restriction of the processing of your personal data and to object to the processing of such personal data;
- f) the right to submit a complaint addressed to a supervisory authority or to initiate court proceedings;
- g) if the data were not collected directly from the data subject, all available information about their source;
- h) if automated decision-making takes place, the fact of this, including profiling, as well as, at least in these cases, the logic applied, i.e. the significance of such data management and the expected consequences for the data subject.

Right to rectification of personal data

At any time, the data subject is entitled to have inaccurate personal data corrected at his request without undue delay. Taking into account the purpose of the data management, the data subject is also entitled to request the addition of incomplete personal data, among other things, by means of a supplementary statement.

Please report any changes to your personal data as soon as possible, thereby facilitating legal data management and the enforcement of your rights.

Right to erasure

The data subject has the right to request that the Data Controller delete his personal data without undue delay if one of the following reasons exists:

- a) the personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- b) in the case of consent-based data processing, withdraw your consent, which is the basis of the data processing, and there is no other legal basis for the data processing;
- c) the data subject objects to data processing and there is no overriding legal reason for data processing, or objects to data processing for direct business acquisition;
- d) we handled personal data illegally;
- e) personal data must be deleted in order to fulfill the legal obligation prescribed by EU or member state law applicable to the Data Controller;
- f) the collection of personal data took place in connection with the offering of services related to the information society.

The right to restrict data processing

The data subject has the right to have the data controller restrict data processing at his request if one of the following conditions is met:

- a) disputes the accuracy of personal data; in this case, the limitation applies to the period that allows us to verify the accuracy of the personal data;
- b) the data management is illegal and opposes the deletion of the data, instead requesting the restriction of their use;
- c) the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to present, enforce or defend legal claims; obsession

- d) the data subject objected to data processing; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

Right to protest

If the legal basis for the processing of personal data is the legitimate interest of the Data Controller (Article 6 (1) point f) of the Regulation, or if the data processing is necessary for the execution of a task performed in the framework of the exercise of public authority conferred on the data controller (Article 6 (1) paragraph e) of the Regulation point) the data subject has the right to object at any time to the processing of his personal data for reasons related to his own situation, including profiling based on the aforementioned provisions.

If the data controller processes the data subject's personal data for the purpose of direct business acquisition (for example, sending informational letters), the data subject has the right to object at any time to the processing of his/her personal data for this purpose, including profiling, if it is related to direct business acquisition. If the data subject objects to the processing of his personal data for the purpose of direct business acquisition, then the personal data may no longer be processed for this purpose.

Balance of interest test

If the legal basis for the processing of personal data is the legitimate interest of the controller or a third party in accordance with Article 6 (1) point f) of the Regulation, we prepare a written "interest assessment test" based on preamble paragraph (47) and Article 5 (2) The data subject can request it by sending a letter to the e-mail address [privacy\(at\)w5labs.com](mailto:privacy@w5labs.com).

Right to data portability

The data subject is entitled to receive the personal data relating to him/her provided to the Data Controller in a segmented, widely used, machine-readable format, and is also entitled to have the Data Controller forward this data to another data controller if:

- a) it is based on the consent of the person concerned with the data management, or on the contract according to point b) of Article 6, paragraph (1) of the Regulation; and
- b) data management takes place in an automated manner.

V. PROCEDURE FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT

The data subject can exercise the above rights in an electronic letter sent to the address [privacy\(at\)w5labs.com](mailto:privacy@w5labs.com), in a postal letter delivered to the Company's headquarters, or in person at the Company's premises. Our company will begin the examination and fulfillment of the request of the data subject after its receipt without undue delay. We will inform the data subject of the measures taken on the basis of his request within 30 days of its receipt. If we are unable to fulfill your request, we will inform you within 30 days of the reasons for the refusal and your rights of redress.

Within five years after the death of the data subject, the rights specified in this information sheet, which the deceased was entitled to during his lifetime, were included by the data subject in an administrative order, or in a public document or in a private document with full evidentiary force, with a statement made to the Data Controller - if the data subject made more than one statement to a data controller, at a later date with a statement made - an authorized person is entitled to enforce it. If the data subject has not made a corresponding legal declaration, his close relative according to the Civil Code is entitled even in the absence thereof in Articles 16 (right to rectification) and 21 (right to protest) of the Decree, as well as - if the data processing was already illegal during the life of the data subject or the purpose of the data management has ceased with the death of the data subject - to exercise the rights defined in Articles 17 (right to erasure) and 18 (right to restriction of data processing) of the Regulation within five years after the death of the data subject. The close relative who is the first to exercise this right is entitled to assert the rights of the data subject in accordance with this paragraph.

VI. RIGHT TO REMEDIES RELATED TO DATA PROCESSING

In order to enforce his right to judicial redress, the data subject may go to court against our Company if, in his opinion, our Company, or a data processor commissioned by us or acting on the basis of our instructions, or a joint data controller, has protected his personal data in the legislation on the handling of personal data, or in accordance with the mandatory legal requirements of the European Union acts in violation of the regulations specified in the act. The court acts out of sequence in the case. Adjudication of the lawsuit falls within the jurisdiction of the court. According to the choice of the person concerned, the lawsuit can also be initiated before the court of the place of residence or residence of the person concerned, or the seat of our Company (Court of Pécs).

By filing a report with the National Data Protection and Freedom of Information Authority (NAIH), anyone can initiate an investigation against the Company, citing that a violation of rights has occurred in connection with the processing of personal data, or that there is a direct risk of such violation, or that the Company is restricting the enforcement of its rights related to data processing, or that the enforcement of these rights rejects your request. The notification can be made at one of the following contacts:

National Data Protection and Freedom of Information Authority (NAIH)

Postal address: 1363 Budapest, Pf.: 9.

Address: 1055 Budapest, Falk Miksa street 9-11

Phone: +36 (1) 391 1400

Fax: +36 (1) 391-1410

Email: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

This information comes into force on September 10, 2021.

W5 IT LLC.
Zoltán Csepregri
Managing Director

