

DATA MANAGEMENT INFORMATION

FOR PARTNERS AND ADVERTISERS

in force from 1 April 2022

1 INTRODUCTION

Our company, Native Hirdetés Kft., has created the [related] intelligent content recommendation and native advertising system (hereinafter referred to as the "System") in order to provide our contractual partners (hereinafter referred to as the "Partner") with a solution for the efficient sale of unused space on their websites (hereinafter referred to as the "Website"), and to enable our advertisers (hereinafter referred to as the "Advertiser") to publish their advertisements more easily and quickly, and to continuously monitor their performance.

In the course of operating the System, using the services we offer and in connection with them, we inevitably process certain personal data. We will always act in accordance with the principles of good faith, fairness, transparency, accuracy and accountability in the processing of data, while fully respecting and enforcing the data processing rights of our Partners and Advertisers. We have designed our data management in accordance with the requirements of 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: GDPR).

We aim to ensure that personal data is adequate, relevant and limited to what is necessary for the purposes for which it is processed. In the course of processing, we will ensure that the personal data we process is kept confidential and that unauthorised access to it is prevented.

2 CONTACT

name: Native Advertising Limited Liability Company

registered office/address: 1064 Budapest, Podmaniczky utca 57. 2. floor.

14. website: www.related.hu

e-mail: office@nativhirdetes.hu

3 DATA PROCESSOR

3.1. The performance of tasks related to the operation and development of the System, and consequently the processing of personal data that we collect from you is carried out by our company using the following external company:

name: Mediadyn Korlátolt Felelősségű Társaság

registered office/address: 9700 Szombathely, Váci Mihály utca 65. 4. floor.

19. e-mail: office@mediadyn.hu

3.2. Detailed information about the data processor who performs accounting activities for our company can be obtained from the contact details in point 2.

4 OUR DATA MANAGEMENT

4.1 REGISTRATION-RELATED DATA PROCESSING

Using the services of the System requires registration - **and** the conclusion of a contract - **with** both the Partners and Advertisers.

4.1.1 ADVERTISER REGISTRATION/CONTRACTING

| | |
|--------------------------------------|---|
| THE SCOPE OF THE DATA PROCESSED | We will record and store the accompanying data of the application and confirmation made on the registration interface - which is also the online contracting interface. Such data include name, address (registered office), tax number, name of the legal representative of the legal entity, so that customers using our services as legal entities your data are not subject to the GDPR. |
| PRINTED FROM | Natural person Advertiser, including self-employed persons, and legal person Advertiser representative. |
| PURPOSE OF PROCESSING | Making the System's services available, allowing the publication of advertisements. |
| JOGALAP | The processing of personal data is subject to a contract with the Advertiser (Article 6(1)(b) GDPR) |
| TIME | The data are based on the Civil Code 2013. V. act (Ptk.) 6:22. § (1), the above purposes for the purposes of a framework contract stored for 5 years after the end of the period of use. |
| DATA SUPPLY POSSIBLE CONSEQUENCES | SUBSCRIBE TO The Advertiser cannot provide the service we provide to use. |

4.1.2 REGISTRATION OF PARTNERS / CONCLUSION OF CONTRACTS

| | |
|--------------------------------------|--|
| THE SCOPE OF THE DATA PROCESSED | Our company records and stores the accompanying data of the application and confirmation made on the registration form as an online contracting interface. Such data includes name, address (registered office), tax number, name of the financial institution holding the account, bank account number, name of the legal representative of the legal entity. Customers using our services as a legal person your data are not subject to the GDPR. |
| PRINTED FROM | Natural person Partner, including sole proprietor, and legal person Partner representative. |
| PURPOSE OF PROCESSING | Making the System's services available, allowing the publication of advertisements. |
| JOGALAP | The processing of personal data is necessary for the performance of the contract with the Partner (Article 6(1) GDPR) paragraph (b)). |
| TIME | The data are based on the Civil Code 2013. V. act (Civil Code), subject to § 6:22 (1), stored for 5 years after the termination of the contract for the above purposes. |
| DATA SUPPLY POSSIBLE CONSEQUENCES | SUBSCRIBE TO The Partner cannot use the service we provide to use. |

4.2 PROCESSING OF DATA RELATING TO THE CONCLUSION OF CONTRACTS OUTSIDE THE SYSTEM

In some cases, the conclusion of contracts with Partners and Advertisers for the publication of advertisements is the responsibility of the

It happens outside the system. In this case, the following processing will be carried out:

4.2.1 CONTRACTING WITH ADVERTISERS

| | |
|--------------------------------------|---|
| THE SCOPE OF THE DATA PROCESSED | Our company records and stores the contract's accompanying data. Such data include the name, address (registered office), tax number, name of the representative in the case of a legal person Advertiser, with the understanding that customers using our services as legal persons your data are not subject to the GDPR. |
| PRINTED FROM | Natural person Advertiser, including self-employed persons, and legal person Advertiser representative. |
| PURPOSE OF PROCESSING | Use of our services. |
| JOGALAP | The processing of personal data is subject to a contract with the Advertiser necessary for the performance of a contract (Article 6(1) GDPR). paragraph (b)) |
| TIME | The data are based on the Civil Code 2013. V. act (Civil Code), subject to § 6:22 (1), stored for 5 years after termination of the contract for the above purposes. |
| DATA SUPPLY POSSIBLE CONSEQUENCES | SUBSCRIBE TO The Advertiser cannot provide the service we provide to use. |

4.2.2 CONTRACTING WITH PARTNERS

| | |
|--------------------------------------|---|
| THE SCOPE OF THE DATA PROCESSED | Our company records and stores the contract's accompanying data. Such data include the name, address (registered office), tax number, name of the financial institution holding the account, bank account number, name of the representative of the legal person, with the Partner data is not covered by the GDPR. |
| PRINTED FROM | Natural person Partner, including sole proprietor, and legal person Partner representative. |
| PURPOSE OF PROCESSING | Use of our services. |
| JOGALAP | The processing of personal data is necessary for the performance of the contract with the Advertiser (Article 6(1) GDPR). paragraph (b)) |
| TIME | The data are based on the Civil Code 2013. V. act (Civil Code) 6:22 (1), we will store the data for 5 years after the termination of the contract for the above purposes. |
| DATA SUPPLY POSSIBLE CONSEQUENCES | SUBSCRIBE TO Our partner no can from by us provided by use the service. |

4.3 PROCESSING OF PERSONAL DATA OF CONTACT PERSONS

| | |
|---------------------------------|--|
| THE SCOPE OF THE DATA PROCESSED | A contact Name, contact person Company telephone number, contact company e-mail address. |
| PRINTED FROM | Contact person. |
| PURPOSE OF PROCESSING | With legal and private business partners who are in contact with us or have contact with us, as well as with Advertisers, in connection with the maintenance of relations, the facilitation of the conclusion of contracts, the performance of contracts |

| | |
|---|--|
| | resolve questions and requests efficiently and quickly. |
| JOGALAP | We process your contact details on the basis of legitimate interest (Article 6(1)(f) GDPR) |
| TIME | A Contact details a contact person until the date of termination of his/her employment, or termination of the contract after termination a Civil |
| | The data will be processed by our Company until the end of the limitation period pursuant to Act V of 2013 on the Hungarian Code of Laws, i.e. five years. If a contact employment of the contact person is terminated, the Partner and the Advertiser shall notify our Company thereof and the contact person may notify us thereof. Following such notification, our Company shall immediately delete. |
| DATA SUPPLY POSSIBLE CONSEQUENCES OF NON-COMPLIANCE | Failure to provide the data will result in the failure to conclude the contract or to communicate between the Partner and the Advertiser and our Company. may involve. |

4.4 DATA PROCESSING IN RELATION TO INVOICING

| | |
|---------------------------------|---|
| THE SCOPE OF THE DATA PROCESSED | Name, address (registered office), tax number. Our service is legal data of users as individuals are not included in the GDPR. |
| PRINTED FROM | Natural person Advertiser - including individual entrepreneur too -. |
| PURPOSE OF PROCESSING | Issue invoices, fulfil accounting obligations. |
| JOGALAP | Processing based on law (Article 6(1)(c) GDPR) subject to the provisions of point (a) of Act C of 2000 on accounting. Act (Act on Accounting) § 166 (1)-(3)). |
| TIME | 8 years after the date of issue of the accounting document. § 166 (6), § 169.) |
| DATA PROCESSOR | The person who performs the accounting activity. About the person of the The Data Controller will provide information on request. |
| ADDRESS | Competent authority. |

4.5 DATA PROCESSING RELATED TO TRANSFER PAYMENTS

| | |
|---------------------------------|--|
| THE SCOPE OF THE DATA PROCESSED | To transfer money related to details: Name, bank account number, amount, date of transfer. |
| PRINTED FROM | Natural person Advertiser - including individual entrepreneur - including. |
| PURPOSE OF PROCESSING | A Our company by provided by service of the fee for the service equalisation. |

| | |
|---|---|
| JOGALAP | Processing necessary for the performance of a contract (Article 6(1)(b) GDPR) |
| TIME | 8 years after the date of issue of the accounting document. § 166 (6), § 169.) |
| DATA PROCESSOR | The person who performs the accounting activity. About the person of the The Data Controller will provide information on request. |
| ADDRESS | Competent authority. In the case of a transfer payment, the payment transaction details are OTP Bank Plc. |
| DATA SUPPLY CONSEQUENCES OF NON-COMPLIANCE | POSSIBLE The person concerned cannot pay the invoice by bank transfer, cannot use our services to use. |

4.6 DATA PROCESSING RELATED TO CONTACTING

| | |
|---|--|
| THE SCOPE OF THE DATA PROCESSED | You can contact us both on our website and via the contact details in point 2. To contact us, please use the depending on the form of contact, name, postal address, e-mail and/or telephone number. |
| PRINTED FROM | Initiating contact. |
| PURPOSE OF PROCESSING | We need the data to respond to enquiries by phone, letter or e-mail. We will not use the information you provide for any other purpose than responding to your enquiries, nor will we use it for any other purpose. to contact. |
| JOGALAP | Processing of personal data based on voluntary consent (Article 6(1)(a) GDPR) |
| TIME | The personal data provided to request information up to 1 year from the date of the reply, or until consent is withdrawn. |
| DATA SUPPLY POSSIBLE CONSEQUENCES OF NON-COMPLIANCE | If the personal data required to reply (depending on the method of contact: e-mail address, telephone number, name, address) are not provided, our company will not be able to provide the answer to the question or problem. |

4.7 DATA MANAGEMENT RELATED TO SYSTEM SECURITY

| | |
|---------------------------------|--|
| THE SCOPE OF THE DATA PROCESSED | In order to ensure the secure operation of the System, we log the following data: the IP address of the computer that initiated the access; the date and time of the access/request; the type of browser used; the version number; and the type of operating system used (together referred to as "log file data"). is placed on the user's computer. |
| PRINTED FROM | User. |
| PURPOSE OF PROCESSING | We need the data to ensure the secure operation of the System, to prevent unauthorised access to the System and the data stored in it, and to prevent unauthorised persons from not to have access to it. |
| JOGALAP | It is in our legitimate interest to ensure the lawful and secure operation of the System, to prevent unlawful use, to protect the Site from external attacks and to ensure the proper functioning of the Site (GDPR 6. Article 2(1)(f)) |
| TIME | The data recorded in the log file will be stored for a maximum of 60 days after recording. This time period is necessary to identify possible errors, fraud or misuse. The cookie will be deleted after 1 hour from the last time it was active. |
| DATA PROCESSOR | System operator, developer. |

4.8 COOKIE-RELATED DATA PROCESSING

The type of cookie we use:

- *Session cookie:* necessary for the operation of the System, without which the System would not function at all or would not function as intended. This cookie may be lawfully used without the consent of the data subject on the basis of our legitimate interest.

The following cookies are placed on your computer when you visit our website:

| Cookie name | Provenance | Purpose, scope of data collected | Validity period | Legal basis |
|-----------------|------------|---|----------------------------------|--|
| related_session | internal | It is essential for the functioning of the System. Without this cookie, the user would not be able to access the System, to switch between pages without the System asking for re-authentication. Without the cookie, the System would not be able to would be useless. | A 1 hour from the last activity. | System operability, essential functions is in the legitimate interest of the Data Controller (GDPR 6. Article 3(1) point f)) |

The cookie used is neither suitable for profiling nor for displaying behavioural advertising.

Please note that it is possible to delete or disable cookies in your browser, as cookie management is supported by most browsers. If you do not want cookies to be placed on your computer, you can set your browser's "Options" or "Settings" menu to not allow cookies. In the setting, individual cookies can be manually deleted, stopped or disabled completely. It is also possible to allow cookies only on certain websites. Please note, however, that if you disable cookies, certain functions of the System will not be available.

The following links may help you to configure your browser settings:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Edge: [Delete and manage cookies \(microsoft.com\)](#)
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies>
- Internet Explorer: <https://support.microsoft.com/hu-hu/topic/cookie-k-t%C3%B6r%C3%A9se-%C3%A9s-kezel%C3%A9se-168dab11-0753-043d-7c16-ed5947fc64d>
- Safari: [Managing cookies and site data in Safari on Mac - Apple Support](#)

5 DATA TRANSFER, DATA PROCESSING, PERSONS ENTITLED TO ACCESS THE DATA

We will not disclose the personal data we process to third parties or public authorities, unless required to do so by law, by a decision of a public authority or with the prior consent of the Partner or the Advertiser. In all cases, we will verify that the data can be lawfully transferred before responding to any requests for data from public authorities.

We do not transfer data to third countries.

In addition to the employees of our company, Mediodyn Kft., as the developer of the System, the System operator, who is also a data processor.

The natural or legal person carrying out the accounting activity has access to the accounting documents and the personal data relating to them as a Data Processor. Detailed information about the person in charge of the accounting activity can be obtained from our Company using any of the contact details in point 2.

Transfers to data processors may be made without the specific consent of the data subjects.

The servers storing the personal data processed are located in the data centres of Rackforest Ltd. as a server hosting provider, additional data processing data centres. The authorised employees of Rackforest Ltd. have physical access to the machines.

6 INFORMATION ON DATA SECURITY MEASURES

Both our Company and the data processors indicated in this Privacy Policy store and process personal data in a closed, continuously monitored IT environment to ensure the security of the personal data processed, and to ensure that unauthorised persons cannot access, modify, remove or copy personal data. We also ensure that the data management system can be restored in the event of a malfunction, that the data management system is operational, that any errors in its operation are reported and that the personal data stored cannot be altered by the malfunctioning of the system. In the context of the above, we ensure that measures are in place to protect against unauthorised access, including the protection of software and hardware devices and physical protection (access protection, network protection). Our computers are password protected and our systems are up to date. We have firewall protection to guard against possible external attacks. We ensure that data files can be restored by regular backups. Paper documentation is kept in a locked filing cabinet. A higher level of protection (https protocol) is used in the System.

7 DATA SUBJECT'S RIGHTS AND MEANS OF REDRESS

| | |
|---|---|
| RIGHT TO INFORMATION (Article 13 GDPR) | The data subject has the right to be informed in an intelligible form by our company of the essential circumstances of our processing, which right is exercised by this privacy notice provides. |
| RIGHT OF RESPECT (Article 15 GDPR) | In addition, the data subject has the right to be informed, in addition to the information contained in this notice, whether we process personal data concerning him or her or personal data that can be associated with him or her, and, if so, to have access to such data, the purposes of the processing and the envisaged duration of the processing. He or she may be informed of the possible recipients, the transfer of data and the other relevant circumstances of processing. |
| RIGHT TO REMEDY (Article 16 GDPR) | The data subject has the right to ask us to correct his or her personal data and, within the limits of the purpose of the processing, to supplement them if he or she becomes aware that his or her personal data are inaccurate or incorrect or are incomplete. |
| RIGHT TO BE DESTROYED (Article 17 GDPR) | The data subject has the right to request the erasure of his or her personal data (unless restricted by law) in the following cases: <ul style="list-style-type: none"> - so that, if the personal data of the data subject are no longer needed by us for the purposes for which they were collected and processed; - where the processing was based on the data subject's consent and the data subject has withdrawn that consent and there is no other legal basis for the processing; - if you object to the processing and, following a balancing of interests, it is determined that the interests of the data subject override the interests of our Company; - if the processing is for direct marketing purposes and the data subject objects to the processing; - if the processing of personal data of the data subject takes place unlawfully; |

| | |
|---|--|
| | <p>- if required by law; -for processing of data relating to the provision of information society services. Delete this to right limit of the right is the expression of opinion freedom of expression and the right to be informed (Article 17 GDPR) Where the legal basis for a processing operation is the GDPR. consent pursuant to Article 6(1)(a), the data subject shall have the right to withdraw his or her consent to the processing at any time. In the absence of any other legal basis for the processing of personal data, the personal data shall be permanently and irrevocably deleted following the withdrawal of consent. Withdrawal of consent prior to withdrawal, processing based on consent does not affect the legality of.</p> |
| <p>LOGIN TO RESTRICT RIGHT READ MORE (Article 18 GDPR)</p> | <p>The data subject has the right to restrict the use of his or her personal data if he or she contests the accuracy, correctness or completeness of his or her personal data. The data subject also has the right to restrict the use of his or her personal data if the processing is unlawful and our Company would oppose the erasure of the data. Furthermore, restriction of the use of personal data may be requested if our Company no longer needs the personal data for the purposes of processing, but the data subject requests it legal needs the establishment, exercise or defence of legal claims or where the data subject has objected to the processing. The restriction may last as long as we verify the accuracy of the personal data in the case of clarification of the accuracy of the personal data. In the case of an objection to processing, the restriction may be maintained until it is established that Whether our legitimate grounds prevail over the interests of the data subject.</p> |
| <p>RIGHT TO DATA PORTABILITY (GDPR 20. Article)</p> | <p>In the case of data processing provided to us on the basis of the data subject's voluntary consent or on the basis of a contract, the data subject is entitled to receive a copy of his or her data in machine-readable (doc; docx; xml) and traditional formats and to have these data transferred to another to the controller without hindrance.</p> |
| <p>RIGHT OF ACCOUNT (Article 21 GDPR)</p> | <p>The data subject may object to the processing of his or her personal data at any time on grounds relating to his or her particular situation, if the processing is based on a legitimate interest of our Company. In this case, the data may only continue to be processed if we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims are related to.</p> |

We will inform each recipient to whom or with which we have disclosed the personal data of any rectification, erasure or restriction of processing we have carried out, unless this proves impossible or involves a disproportionate effort. Upon request, we will provide information about these recipients to the data subject.

8 DEADLINE FOR ACTION

Requests to exercise the rights of the data subject may be made in writing or electronically at any of the contact details listed in point 2.

We will take a decision on the request without undue delay, but at the latest within one month of receipt, and inform the data subject of the action taken on the request. If necessary, the time limit may be extended by two months.

9 RIGHTS OF DATA SUBJECTS IN RELATION TO DATA PROCESSING

Please note that if you believe that your rights to the protection of your personal data have been infringed, you should contact us using one of the contact details in section 2 to investigate the complaint and remedy the possible infringement as soon as possible:

Civil proceedings can be brought before the competent court to remedy any infringements. A court of law has jurisdiction to hear the case. Proceedings may also be brought before the court of the place of residence or domicile of the person concerned. The court shall decide the case by default.

For more information and contact details of the courts, please visit: <http://birosag.hu/torvenyszekek>

Furthermore, the data subject has the right to lodge a complaint with the competent authority (*National Authority for Data Protection and Freedom of Information, headquarters: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.: 9. phone: +36 (1) 391 1400, ügyfelszolgalat@naih.hu, website: www.naih.hu.*)