

**Mobilengine Ltd.**

**DATA PROCESSING, DATA PROTECTION POLICY  
AND CONDITIONS OF USE**

**V 1.0  
24 May 2018**

### DECLARATION

#### REGARDING THE DRAFTING AND ENTRY INTO FORCE OF THE DATA PROTECTION POLICY

Mobilengine Ltd. (company registration number: 08305181; VAT number: GB188853839, registered seat: 1 Northumberland Avenue, London, WC2N 5BW, customerservice@mobilengine.com, phone: +44 207 872 5866) hereinafter as Mobilengine (data controller) has drafted and falls within the scope of the following data protection policy prepared on this day. Mobilengine undertakes to comply with this policy, the provisions of the applicable national legislation as well as the requirements prescribed by the legal acts of the European Union during any data processing activity carried out in connection with its activity, in particular, the following legislation:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 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 (General Data Protection Regulation);
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services (in particular Section 13/A);
- Act C of 2003 on electronic communications (in particular Section 155)
- Act XC of 2005 on the freedom of electronic information.
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 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 (General Data Protection Regulation);
- Act XLVII of 2008 on the Prohibition of Unfair Business-to-Consumer Commercial Practices;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (in particular Section 6);
- Act CXII of 2011 on the right of informational self-determination and on freedom of information (hereinafter: Privacy Act);
- Opinion 16/2011 on EASA/IAB best practice recommendation on online behavioural advertising;
- Recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements of the provision of prior information;
- Section 169 (2) of Act C of 2000 on Accounting.

Mobilengine software and <http://www.mobilengine.com> shall be governed by this data protection policy.

The data protection policy is available at: <http://www.mobilengine.com/gdpr>.

Mobilengine reserves the right to amend this policy any time. Any amendment to this policy shall take effect once it has been published at the above address. Mobilengine is committed to protect the personal data of its clients and partners, and deems it of the utmost importance to respect its clients' right of self-determination. Mobilengine keeps personal data confidential and takes all safety, technical and organisational measures necessary to ensure the safety of such data.

Mobilengine sets out its data processing practices below:

During the processing of personal data, Mobilengine applies two methods depending on whether the personal data are received and processed by Mobilengine as a data controller or data processor.

Regarding data received by Mobilengine as a Data Controller, the rules of procedure are set out in Chapter 2., regarding data received as Data Processor, the rules of procedure as set out by Chapter 6.

**1. DATA AND CONTACT DETAILS OF DATA CONTROLLER:**

Name: Mobilengine Ltd.  
Registered seat: 1 Northumberland Avenue, London, WC2N 5BW, UK  
E-mail: office@mobilengine.com  
Phone.:+44 207 872 5866  
Company registration number: 08305181  
Tax number: GB188853839

**THE PURPOSE OF THE DATA PROCESSING POLICY**

The purpose of this Data Processing Policy is to specify the scope of the personal data processed by Data Controller, the method of data processing, ensure the privacy of natural persons in accordance with the effective legislation and compliance with the requirements of data protection and data security, and to prevent unauthorised access to or use of personal data, modification or unauthorised disclosure of personal data.

**DATA CONTROLLER DECLARES THAT ITS DATA CONTROLLING ACTIVITY COMPLIES WITH THE FOLLOWING PRINCIPLES.**

- a) **Lawfulness, fairness and transparency:** Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
- b) **Purpose limitation:** Personal data may only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with **Article 89 (1)**, not be considered to be incompatible with the initial purposes;
- c) **Data minimisation:** Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ;
- e) **Storage limitation:** Personal data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with **Article 89 (1)** subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject;
- f) **Integrity and confidentiality:** Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- g) **Accountability:** Data controller shall be responsible for, and be able to demonstrate compliance with the above.

## DEFINITIONS

**“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;

**“processing”**: 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**“controller”**: 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 Union or Member State law;

**“processor”**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**“recipient”**: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

**“Consent of the Data Subject”**: 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;

**“personal data breach”**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

## 2. DATA CONTROLLING

**LEGAL BASIS FOR PROCESSING** Data processing carried out by Mobilengine is based on [GDPR, Article 6 (1) a)] a consent that is freely given. Controlling is carried out upon the freely given, clear, informed and unambiguous consent of the data subject that contains the explicit consent of the data subjects to control their data provided during the usage of the Mobilengine Software, that is, the Mobilengine iOS and Android mobile application, computer application, developer application, server application, and other software solutions as well as the usage of any solution included in Mobilengine Whitepaper - hereinafter Mobilengine Software, and during visiting or using [www.mobliengine.com](http://www.mobliengine.com) (for entire or specific processes).

**SCOPE OF USERS (VISITOR, REGISTERED VISITOR, SUBSCRIBER)**: With particular attention to Article 1(1)-(2) 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 (General Data Protection Regulation), the Data Subjects are the **visitors** of <http://www.mobliengine.com>, **registered users** of Mobilengine Software and **subscribers** making a contract with

Mobilengine. **Registered users** include natural persons who registered online or via another method to Mobilengine Software and gave their own data and those registered in the Mobilengine Software by a **subscriber** or listed in the recipients of newsletters. During the operation of <http://www.mobilengine.com>, Mobilengine Software and the newsletter, Mobilengine (as Data Controller) processes the data of the **visitors** and **registered users** (as Data Subjects).

Regarding **technical data**, Data Subjects consent to be bound by the provisions of this Data Protection Policy by visiting and/or enter [www.mobilengine.com](http://www.mobilengine.com) to collect information or log in to and/or use Mobilengine Software. Regarding **any other data**, Data Subjects accept the provisions of the Data Protection Policy, based on the consent provided during the registration and contract process and - in accordance with Article 6 (1) a) and Article 7 of the GDPR - give their consent to controller to process their data in compliance with the GDPR and their own data controlling policy with regard to the fact that pursuant to Article 7 (3) of the GDPR, Data Subject may withdraw his or her consent at any time, by sending a written notification to **Controller**.

Data Subject shall provide correct and valid data to Controller (Data Subject shall compensate for damages arising out of the provision of incorrect data). Consequences arising out of the provision of incorrect or incomplete data shall be borne exclusively by Data Subject. Controller does not check the data or their veracity.

**SCOPE OF THE DATA CONTROLLED:** name, user ID, e-mail address, phone number, the address of the website visited, the IP address of the user, the hardware and software version of user's mobile device, GPS and other location data of user's mobile device and data related to the operational system and the browser of user's personal computer. During the visit to [www.mobilengine.com](http://www.mobilengine.com) or the usage of Mobilengine Software, Mobilengine records visitors' data to check the operation of the service, to provide tailor-made services, to prevent abuse and to transfer the data to related Mobilengine companies. Legal basis for the processing: the consent of the Data Subjects and Section 13./A (3) of Eker (Act CVIII of 2001 on certain issues of electronic commerce services and information society services).

**PURPOSE OF DATA CONTROLLING** The purpose of data controlling related to visiting the website, using the Mobilengine Software and registering is to provide high quality service regarding content and IT aspects, identify users and reference data, ensure safe storage of the data and back-up data, log the operation of the Mobilengine Software, ensure operative monitoring and retraceability to guarantee high service quality, analyse system errors, display personalized content and statistical reports and ensure customer relationship management. In addition to customer relationship management, the purpose of data controlling related to the service agreements concluded with customers is to fulfil contractual obligations during service provision and issue invoice in compliance with the accounting rules.

Data Subjects explicitly give their consent to Controller to control their data provided or directly uploaded into the Mobilengine Software or sent via other communication channels for the purposes specified herein, in line with the applicable legislative framework and with view to the principle of purpose limitation. Data processing is carried out by Controller using its own IT systems and during the operation of the Mobilengine Software, Controller uses third-party services for hosting, storage and other cloud-based IT services, such as BI statement services, report generating software, tracking of error recording, mobile application developing and operating services, data-archiving services, system monitoring services, test system services and e-mail services (data processor). IT systems listed above operated by Mobilengine or used via third-party service providers are hereinafter referred to **Mobilengine Integrated IT system**. Mobilengine stores the data on its Integrated IT system, the third-party service providers of which thus became data processors.

Data Subjects give their consent to Mobilengine to use its subcontractors or service provider partners - who are regarded as data processors of Mobilengine - in particular, among others the following companies: Mobile Engine Kft. (address: 1061 Budapest, Paulay Ede u.50.), Mobilengine Ltd. Hungarian branch office (address: 3530 Miskolc, Erzsébet tér 5. 1/1.), Mobilengine North America Corp (address: 745 Atlantic Avenue, Boston, MA 02111, USA), Robotinformatika (address: 3531 Miskolc Kiss Ernő utca 19.), BauApp Kft. (address: 3530 Miskolc, Erzsébet tér 5. 1/1.). The companies listed above are hereinafter referred to as **Mobilengine Related Companies**.

By accepting this data processing policy, Data Subject explicitly consents to the processing of any data provided (e.g.: via e-mail) that goes beyond the scope of personal data, that is, sensitive data. Controller, however, informs Data Subject that it only processes data requested by Controller. The acceptance of this policy shall be considered by Data Subject to be in writing. Controller declares that the data provided by the Data Subjects are processed only for the specific purpose and it may not use such data for purposes other than indicated. Upon the request of an authority, or legal obligation, Controller shall disclose the data to the relevant body (e.g.: authority), by accepting this data processing policy, Data Subjects give their explicit consent to such disclosure, consequently, Controller is not obliged to ask for further consent from Data Subjects. Data Subjects shall not submit any request to Controller for that purpose. Controller may not be held liable regarding the data provided. In all cases where Controller wishes to use the data provided for purposes other than the original purpose of the data collection, Controller shall inform Data Subject and ask his or her prior, explicit consent and provide opportunity to the Data Subject to prohibit processing.

### DECLARATION OF CONSENT OF THE DATA SUBJECT

- (I.) Regarding technical data, **Visitor** to www.mobilengine.com, when visiting the website, automatically
- (II.) Regarding technical and other data based on consent, **registered user** of Mobilengine Software, once the registration is finalized and/or when Data Subject enters and/or uses the Mobilengine Software,
- (III.) Regarding technical and other data provided in relation to the conclusion of an agreement, contracting partner (**Subscriber**) of Mobilengine, when the product order is sent or the agreement related to the order is signed,

### **gives his or her consent**

to the processing of his or her data in accordance with the provision of this Policy. In case data processing is carried out by Controller pursuant to the provisions of this Policy, Data Subject may not enforce any claim for damages, compensation, general damages for infringement of personal right or other claims against Controller.

### **Newsletter:**

Data Subject may subscribe or be subscribed by another Data Subjects to receive newsletters from Mobilengine. If Data Subject does not wish to receive newsletters sent by Mobilengine, he or she may unsubscribe from the newsletter by clicking “Leiratkozás” or “Unsubscribe” at the bottom of the newsletter. The data of the Data Subject will be erased after the Data Subject has unsubscribed.

### DATA SUBMITTED DURING THE REGISTRATION

Personal data	Purpose of data processing
Last name and first name	<ul style="list-style-type: none"> <li>- First communication</li> <li>- Unique identifier necessary for the usage of the Mobilengine Software</li> </ul>
E-mail address	<ul style="list-style-type: none"> <li>- First communication</li> <li>- keeping contact;</li> <li>- Unique identifier necessary for the usage of the Mobilengine Software</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> <li>- Other communication purposes of Mobilengine.</li> </ul>
Phone number	<ul style="list-style-type: none"> <li>- First communication</li> <li>- keeping contact;</li> <li>- To use the Mobilengine Software, identification, data communication and data transfer;</li> </ul>

**DATA ACCESSIBLE FOLLOWING REGISTRATION**

The website [www.mobilengine.com](http://www.mobilengine.com) and the Mobilengine Software stores data related to **users entering the website** using their registered username/e-mail address and password, that can be connected with the personal data of the user who entered the website, consequently, Controller processes the data detailed below as personal data.

Personal data	Purpose of data processing
---------------	----------------------------

Username	<ul style="list-style-type: none"> <li>- Unique identifier necessary for the usage of the Mobilengine Software</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> <li>- To use the Mobilengine Software, identification, data communication and data transfer;</li> </ul>
Password	<ul style="list-style-type: none"> <li>- To use the Mobilengine Software, unique identification;</li> </ul>
IP address	<ul style="list-style-type: none"> <li>- Data required for the smooth operation of Mobilengine Software and www.mobilengine.com</li> </ul>
GPS and other locational data	<ul style="list-style-type: none"> <li>- Data required for the smooth operation of Mobilengine Software</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> </ul>
Hardware and software version of a mobile device	<ul style="list-style-type: none"> <li>- Data required for the smooth operation of Mobilengine Software</li> </ul>

**DATA PROVIDED DURING THE PREPARATION AND CONCLUSION OF THE AGREEMENT (ORDER/CONFIRMATION OF ORDER)**

<b>Personal data</b>	<b>Purpose of data processing</b>
Signatory, contact person (etc.) Last name and first name	Required for contact, purchase and the issuance of the invoice in accordance with the relevant requirements.
E-mail address	Keeping contact
Phone number	Keeping contact, efficient arrangement of issues related to invoicing or shipping.
Invoicing name and address	Issuing invoices in accordance with the relevant requirements, preparing the agreement, determining, amending the content of the agreement, tracking contractual performance, invoicing fees and enforcing claims related to the agreement.

**TECHNICAL DATA**



Data generated during the usage of www.mobliengine.com and the Mobilengine Software, which is recorded by **Mobilengine Integrated IT system** as a result of the IT processes. These data are, among others, the data of visit, the IP address of Data Subject, the type of the browser, the address of the website previously visited. (The IP address is a series of numbers based on which the computers of the users using the internet can be clearly identified. Thanks to the IP addresses, the user using the relevant computer can even be located geographically. The addresses of the websites, the date and the time, as such, are not suitable for identifying the Data Subject, but if they are connected with other data (e.g.: data provided during the registration), they can be used to draw consequences about the user.) Data recorded automatically are logged automatically when logging in or out without a specific declaration or action of the Data Subject. The sets of data processed electronically in various registries are not connected and these data may not be assigned directly to the Data Subjects - unless it is permitted by the law. Only Controller and the Data Subjects have access to the data and the data are stored in the Mobilengine Integrated IT system with the involvement of the necessary data processors. The data of the Data Subject who registers are stored in the same database with his or her technical data according to the purposes of the processing. Data Subject gives his or her consent to the above when registering at the website and accepting this policy.

Personal data	Purpose of data processing
IP address	Data used to improve service quality.
Data of the websites and downloaded documents visited during the browsing activity at www.mobilengine.com.	Data used to improve service quality.
The time spent browsing www.mobilengine.com.	Data used to improve service quality.
Type of the browser	Data used to improve service quality.
Type of the operation system	Data used to improve service quality.

### 3. HANDLING COOKIES

Cookies are alphanumeric data sets with various content sent by the webserver and stored on the user’s computer for a pre-defined validity period. Cookies are used to collect certain data of the visitors and track internet usage.

Thus, with the help of cookies , the interests, internet usage patterns and browsing history of the Data Subject can be accurately determined. Since cookies function as label files, that can identify visitors returning to the website the username and the password can also be stored by the usage of cookies.

If during the site visit the browser of the user sends back the cookies previously saved on the hard drive, the service provider that sent the cookie can connect the current visit with the previous ones, but as cookies are linked to the domains, it is only possible regarding the content of the relevant website. Cookies are not in themselves suitable for identifying the user, they can only identify the visitor’s computer.

Based on their validity period and origin, there are various types of cookies:

- “session cookies protected with a password”
- “secure cookies”
- “Necessary cookies”
- “Functionality cookies”
- “cookies responsible for managing site statistics”

The existence of processing, the scope of the data processed: Unique identification number, dates, times

The scope of the Data Subjects: Each Data Subject visiting the website.

Purpose of data processing: The identification and tracking of the users.

Duration of processing, the deadline for the erasure of the data:

Type of cookie	Legal basis for the processing:	Duration of processing
<b>Session cookies</b>	Paragraph (3) Section 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.	The period until the end of the relevant visitor session.
<b>Permanent or saved cookies</b>	Paragraph (3) Section 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.	Until the data subject is erased

Informing the data subjects about their rights related to processing: Data subjects may erase cookies in the Tools/Settings menu of their browser by choosing Data Protection settings.

Legal basis for the processing: Consent from the Data Subject is not required if the data are used for the sole purpose of carrying out the transmission over an electronic communication network or necessary for Mobilengine in order to provide an information society service explicitly requested by the Data Subject.

#### 4. Duration of processing, the deadline for the erasure of the data:

Personal data mandatorily provided during the registration process is controlled from the date of the registration until the erasure of the data. Logged data are stored for 6 years from the date of logging. Controller shall inform Data Subject about the erasure of any personal data electronically, in accordance with Article **19 of the GDPR**

If the e-mail address provided by the Data Subject is included in the data to be erased based on the request of the Data Subject, Controller shall erase the e-mail address once the notification has been sent.

Regarding the mandatory data to be stored in line with the legal requirements, Mobilengine is not able to comply with the request, in particular in case of accounting documents, as pursuant to **Section 169 (2) of Act C of 2000 on Accounting**, these data shall be stored for 8 years. Accounting documents supporting the preparations of the accounts either directly or indirectly (including the general accounts, the analytic and detailed registries) shall be retained for at least 8 years, in a legible format and traceable manner and according to the reference numbers of the accounting records.

**Possible data controllers entitled to have access to the data, the recipients of personal data:** Personal data may be controlled by the employees of Mobilengine or Mobilengine Related Companies in line with the principles specified above.

**Informing the data subjects about their rights related to processing:**

- Data subject is entitled to request from the Controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject
- and to object to processing.
- Data Subject is entitled to withdraw his or her consent at any time.

**Access to, erasure, modification of the personal data, or restriction of procession, data portability or objection to processing can be requested by Data Subject in the following manner:**

- by regular mail sent to the registered address of the company
- via e-mail to **customerservice@mobilegine.com**.

**5. The legal basis for the processing:**

- Paragraph (1), Article 6 of the GDPR, Section 5 (1) of the Privacy Act,
- Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (in particular Section 13/A; (hereinafter: Eker):
- For service provision purposes, Mobilengine may process personal data that are technically, strictly necessary to provide the services. In case of equivalent conditions, Mobilengine shall choose and apply in each case the technical tools used in connection with information society services to ensure that personal data are processed only if it is strictly necessary for the provision of the service and to comply with the purposes of this legislation and only to the extend and for the period necessary.

For invoices issued in accordance with the account legislation, Article 6 (1) c).

**6. Data processing**

**MOBILENGINE SOFTWARE SERVICE WORKFLOW DATA**

In the cases and regarding the set of data specified below, Mobilengine performs exclusively data processing activities as a representative of Subscriber based on a subscriber, agency or license agreement to the extent it is necessary for the provision of Mobilengine service. When using the Mobilengine Software, Subscriber becomes Data Controller regarding the data recorded in the Mobilengine Software by Subscriber and its Users. During the usage of the Mobilengine Software, Subscriber can register natural persons or legal entities as employees, agents or other parties related to Subscriber or record personal data of these Data Subjects in another manner in the database of Mobilengine Software. Subscriber can record these data on the management platform of the Mobilengine Software, or on a software platform specifically developed for the relevant Subscriber, or directly requesting it from a Mobilengine employee. Subscriber can also record data automatically in the Mobilengine Software using the integration channel connecting the Mobilengine Software and the its own IT system. In such

cases, the Subscriber is the exclusive Controller and Mobilengine only has a data processor role. The data processing activity of Mobilengine is provided on the condition that Subscriber provides comprehensive information to the each of its registered Users and other Data Subjects regarding the subject, content and scope of the processing and the Users and other Data Subjects have given their consent to data processing in accordance with the legislative requirements both regarding form and content. This information and consent is the full responsibility of Subscriber. Mobilengine is not able or obliged to check the provision of this information and whether the consent is given. Subscriber takes note of the fact and acknowledges that Mobilengine shall not be held liable for any damage arising out of the failure to comply with this obligation to provide information and request consent or incomplete implementation of the obligation, and in the event of any damage, Subscriber shall release Mobilengine from any sanctions or liability to pay a compensation.

The scope of the data processed:

Personal data	Purpose of data processing
Raw data: User data stored among the data registered during the usage of the Mobilengine Software	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> </ul>
Raw data: Personal data that may have been registered during the usage of the Mobilengine Software	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> </ul>
Historic data	To comply with the IT parameters of the service agreement.
Log files: Set of files used for logging and tracking the processes, error messages generated, incoming and outgoing data on the Software mobile and server application of Mobilengine.)	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> </ul>
User reports (pdf summary, excel sheets, dashboards)	To comply with the IT parameters of the service agreement.

User data (username, e-mail address, ID, password)	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> <li>- Unique identifier necessary for the usage of the Mobilengine Software</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> </ul>
GPS and other locational data	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To use the Mobilengine Software and have access to selected content and applications;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> </ul>
Uploaded files, documents: uploaded to the Mobilengine Software	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> </ul>
Personal data not related to user data: personal data recorded of other private individuals recorded by the user	<ul style="list-style-type: none"> <li>- To comply with the IT parameters of the service agreement.</li> <li>- To ensure the logical operation of the Mobilengine regarding the data and the processes;</li> <li>- To generate reports and statistics for the Mobilengine Software and send notifications;</li> </ul>

**Legal basis for data processing:** the individual agreement made between Data Controller and Mobilengine. Data Subject (user) gives his or her consent freely and in advance to Controller to process the data.

**Controlling period:** Regarding user data, Subscriber can access and erase the personal data at any time via the User Manager. Historic data, log files and user reports are processed until the withdrawal of the user’s consent but no later than the for 5 years following the termination of the services agreement. The option for certain data elements to be erased is under development. In case of any request to erase certain data elements, Mobilengine provides comprehensive information to what extent it is possible to erase the relevant data.

**Requesting erasure or modification of the data:**

With view to the fact that based on the individual agreements concluded with the Subscribers, Mobilengine is a data processor, Data Subjects may not request rectification or erasure of the data directly from Mobilengine, since the data are processed based on the agreement made between Mobilengine and Subscriber.

Data Subjects have the right to obtain from the Subscriber (controller) the rectification of incorrect personal data or the erasure of the personal data concerning him or her without undue delay and the Subscriber (controller) shall have the obligation to erase personal data concerning the Data Subject without undue delay.

Data Subject may exercise this right by submitting his or her request to the Subscriber who shall erase or rectify the data by using the Mobilengine Software.

Subscriber (controller) may contact Mobilengine (processor) regarding these issues via the contact person indicated in the individual agreement or using the mailing address of Mobilengine specified above.

### PROCESSING OF EXTERNAL SERVICE PROVIDERS:

The following data processors can provide detailed information regarding the processing of the data by the servers of external service providers. In the **Mobilengine Integrated IT system** and during the operation and development of the Mobilengine Software, Mobilengine uses third-party services for server hosting, storage and other cloud-based IT services, such as BI statement services, report generating software, tracking of error recording, mobile application developing and operating services, data-archiving services, system monitoring services, test system services and e-mail services.

These data processors are listed below:

#### HOSTING SERVICE PROVIDER

Activity performed by data processor: Hosting services

Name of data processor: Magyar Telekom Nyrt.

Address: 1519 Budapest, Pf.:434

Contact: [www.telekom.hu/uzleti](http://www.telekom.hu/uzleti)

The existence of processing, the scope of the data processed: All data provided by the Data Subject.

The scope of the Data Subjects: All Data Subjects using the Mobilengine Software.

Purpose of data processing: Storing the business data necessary for the operation of the Mobilengine Software.

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the storage service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

#### BI DASHBOARD SERVICE PROVIDER

Activity performed by data processor: statistical reports, reports, generating dashboards.

Name and contact details of data processor: Periscope Data

Address: 1125 Mission Street, San Francisco, CA 94103, USA

Contact: [www.periscopedata.com](http://www.periscopedata.com)

Name and contact details of data processor: Google Cloud SQL database service

Contact: <https://cloud.google.com/sql/>

The existence of processing, the scope of the data processed: Statistical data included in business specifications, that may include personal data suitable for identification.

The scope of the Data Subjects: All Data Subjects using the Mobilengine Software BI Dashboard.

Purpose of data processing: To provide access to and ensure smooth operation of the Mobilengine Software, generate reports, statistical reports and present the appropriate content.

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the BI dashboard service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

### E-MAIL SERVICE PROVIDER

Activity performed by data processor: e-mail communication for customer service purposes and sharing files

Name and contact details of data processor: Google Ireland Limited

Address: Gordon House Barrow Street Dublin 4 Ireland

Website: <https://cloud.google.com>

The existence of processing, the scope of the data processed: All data provided by the Data Subject.

The scope of the Data Subjects: All Data Subjects using the Mobilengine Software.

Purpose of data processing: Performing activities related to sales and customer service, direct communication with the Subscriber and other communication related to providing support to Subscriber.

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the e-mail service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

### BACKUP SERVICES:

Activity performed by data processor: storage of backup data

Name and contact details of data processor: Google Cloud Storage Multi-Regional object storage

Contact: <https://cloud.google.com/products/storage/>

The existence of processing, the scope of the data processed: All data provided by the Data Subject.

The scope of the Data Subjects: All Data Subjects using the Mobilengine cloud service.

Purpose of data processing: Storage service for the back-up of Mobilengine Software.

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

### OTHER EXTERNAL SERVICE PROVIDERS:

1. Activity performed by data processor: CRM system storing client data.

Name and contact details of data processor: Salesforce

Contact: <https://www.salesforce.com/eu>

Name and contact details of data processor: Hubspot

Contact: <https://www.hubspot.com/>

The existence of processing, the scope of the data processed: All data provided by the Data Subject.

The scope of the Data Subjects: All Data Subjects using the Mobilengine Software.

Purpose of data processing: customer relation management

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the external service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

2. Activity performed by data processor: processing client data and data of the visitors to the website

Name and contact details of data processor: GoDaddy

Contact: <https://uk.godaddy.com/hosting/web-hosting?isc=gofhehg07>

The existence of processing, the scope of the data processed: The e-mail addresses of Data Subjects downloading the business brochure.

The scope of the Data Subjects: All Data Subjects downloading the business brochure.

Purpose of data processing: Keeping contact with clients

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the external service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

3. Activity performed by data processor: Sending text messages during the installation of mobile applications.

Name of data processor: NEXMO

Contact: <https://www.nexmo.com/>

The existence of processing, the scope of the data processed: The phone numbers of clients installing Android mobile applications.

The scope of the Data Subjects: All Data Subjects installing Android mobile applications.

Purpose of data processing: Identification of subscriber.

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the external service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.



4. Activity performed by data processor: Customer service contact system.

Name of data processor: Freshworks

Contact: <https://www.freshworks.com/>

The existence of processing, the scope of the data processed: E-mail address, name and phone number of subscribers using Mobilengine customer service portal.

The scope of the Data Subjects: All Data Subjects using Mobilengine customer service portal.

Purpose of data processing: Providing customer service.

Duration of processing, the deadline for the erasure of the data: Data controlling shall last until the termination of the agreement between data processor and the external service provider or the request of the Data Subject submitted to Controller to erase the data.

Legal basis for data processing: Article 6 (1) f) of the GDPR and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

**USING GOOGLE ANALYTICS**

This website uses Google Analytics, which is the web analysis service of Google Inc. (“Google”). Google Analytics uses so called cookies, text files saved on your computer to help analyse the use of the website visited by the User. Information generated by cookies and related to the website used by the User are generally recorded and stored in one of the Google servers located in the USA. By activating the IP anonymization for the relevant website, the IP address is shortened by Google within the member states of the European Union or in other states party to the agreement on the European Economic Area. Entire IP addresses are transferred to the Google servers located in the USA to be shortened there only in exceptional cases. Based on the assignment of the operator of this website, Google will use this information to assess how the User used the website and prepare reports for the operator of the website related to the website activity and provide further services related to internet usage and the usage of the website. Within the framework of Google Analytics, the IP address forwarded by the browser of the User is not connected to other data by Google. Storage of cookies can be blocked by the User with the appropriate setting applied in the browser. However, we would like you to note that in this case it may happen that not all functions of this website will be entirely available. If you download and install the browser plugin below, you can block Google to collect and process the data generated by the cookies and related to the website usage of the User (including the IP address). <https://tools.google.com/dlpage/gaoptout?hl=hu>

**HANDLING COMPLAINTS**

The existence of processing, the scope of the data processed and the purpose of data processing:

Personal data	Purpose of data processing
Last name and first name	Identification, keeping contact.
E-mail address	Keeping contact
Phone number	Keeping contact

The scope of the Data Subjects: Users raising objections or making complaints.

Duration of processing, the deadline for the erasure of the data: Copies of the records or transcript of the complaint as well as the reply shall be kept for 5 years in accordance with Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

**Possible data controllers entitled to have access to the data, the recipients of personal data:** Personal data may be controlled by sales and marketing employees of the controller in line with the principles specified above.

**Informing the data subjects about their rights related to processing:**

- Data subject is entitled to request from the Controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject
- and to object to processing.
- Data Subject is entitled to withdraw his or her consent at any time.

**Access to, erasure, modification of the personal data, restriction of procession or data portability can be requested by Data Subject in the following manner:**

- by regular mail sent to the registered address of the company
- via e-mail to **customerservice@mobilegine.com**.

**Legal basis for the processing: the consent of the Data Subject,** Article 6 (1) c), Section 5 (1) of the Privacy Act and Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

We would like to inform you that

- the provision of the personal data is based on a **contractual obligation**.
- the processing of the personal data is a **precondition** for the conclusion of the agreement
- **you are obliged** to provide personal data so that we can handle your complaint.
- **The consequence** of any failure to provide the relevant data is that we will not be able to handle the complaint submitted to our company.

### SOCIAL NETWORKING SITES

The existence of processing, the scope of the data processed: Name and the profile picture of the User registered in Facebook and LinkedIn

The scope of the Data Subjects: Each Data Subject, who signed up for Facebook or LinkedIn and “liked” the website.

Purpose of data processing: Sharing, “liking” or promoting the website, its specific content elements, products, campaigns on the social networking sites.

Duration of processing, the deadline for the erasure of the data, providing information related to the data processors that have the right to have access to the data and the rights of the Data Subjects related to processing: Data Subject can find information regarding the source, processing, the method of transfer and the legal basis on the relevant social networking sites. Processing is carried out on the social networking sites, consequently, the regulation of the social networking site is applicable regarding the duration and method of processing, the possibilities of the modification or erasure of the data.

Legal basis for the processing: the consent freely given by the Data Subject to the processing of the data concerning him or her on the social networking sites.

#### CUSTOMER RELATIONS AND OTHER DATA PROCESSING

Data Subject may contact the processor at the contact details indicated on the website (phone, e-mail, social networking sites etc.) in case of any questions or problems during the usage of our processing services. Processor shall erase the incoming e-mails, messages, and any data provided on the phone or via Facebook etc, along with the name and e-mail address and other freely given personal data of the Data Subject submitting the enquiry for up to 5 years following the processing activity.

We provide information about processing activities not detailed herein when the relevant data are recorded. Mobilengine shall provide information, disclose or provide data or documents if it is specifically requested by an authority or other bodies in accordance with the relevant legislation.

In such cases, Mobilengine provides personal data to the requesting party - if the specific purpose and the scope of the data are given - to the extent and that is strictly necessary for the achievement of the relevant purpose.

#### RIGHTS OF THE DATA SUBJECTS

##### **Right of access**

You have the right to obtain from the controller confirmation as to whether or not personal data are being processed, and, where that is the case, access to the personal data and the information included in the regulation.

##### **Right to rectification**

of inaccurate personal data Taking into account the purposes of the processing, You have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

##### **Right to erasure**

You have the right to obtain from the controller the erasure of your personal data without undue delay and the controller shall have the obligation to erase personal data without undue delay where the relevant grounds apply:

##### **Right to be forgotten**

Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that You have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

##### **Right to restriction of processing**

You have the right to obtain from the controller restriction of processing where one of the following applies:

- You contest the accuracy of the personal data; the restriction shall apply for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and You oppose the erasure of the personal data and request the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but You require them for the establishment, exercise or defence of legal claims;
- You have objected to processing; in such case restriction shall apply for a period until it is verified whether the legitimate grounds of the controller override those of the data subject.

### Right to object

You have the right to object, on grounds relating to Your particular situation, at any time to processing of Your personal data based on a legitimate interest or official authority, including profiling based on those provisions.

### Objection in case of direct marketing purposes

Where personal data are processed for direct marketing purposes, You have the right to object at any time to processing of personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. If You object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

### Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or has similar, significant effects.

The paragraph above shall not apply if the decision:

- Is necessary for entering into, or performance of, a contract between You and a data controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard Your rights and freedoms and legitimate interests; or
- is based on Your explicit consent.

### DEADLINE FOR TAKING THE NECESSARY MEASURES

The controller shall provide information on action taken on the request above without undue delay and in any event within **1 month** of receipt of the request.

That period **may be extended by 2 further months** where necessary. The controller shall inform You of the extension of the deadline **within 1 month** of receipt of the request, together with the reasons for the delay.

If the controller does not take action on Your request, **the controller shall inform You without delay and at the latest within one month of receipt of the request of the reasons for not taking action** and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

**SECURITY OF PROCESSING**

Taking into account the state of the art and technology, the cost of implementation and the nature, the current technological capabilities of Mobilengine, the scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

**CURRENTLY KNOWN TECHNICAL LIMITATIONS OF THE MOBILENGINE SOFTWARE IN THE AREA OF DATA ERASURE AND MODIFICATION**

In accordance with the provisions of GDPR, Mobilengine is committed to take into account data protection options and the possibility to erase or subsequently modify personal data in its future developments. However, due to several years of development and considering the current technology there are some limitations and restrictions in Mobilengine regarding the subsequent erasure or modification of personal data. In accordance with the provisions of GDPR, Mobilengine is also committed to reduce or resolve these restrictions within an economically rational period. Restrictions applicable within the scope of this Policy are listed below: If upon or regardless of the request of Data Subject, Subscriber or Controller requests erasure and/or modification of any data that is beyond the capacity of the current technological parameters of the Mobilengine Software, Mobilengine is able and willing to take the necessary measures related to the relevant request, exclusively based on an agency agreement and agency fee mutually agreed by Subscriber and Mobilengine according to the timing set out by such agreement.

<b>Personal data</b>	<b>Limitations of subsequent erasure or modification of data</b>
----------------------	--

<p>Username</p>	<ul style="list-style-type: none"> <li>- The user can be erased or the relevant data can be modified with the user management application</li> </ul>
<p>Password</p>	<ul style="list-style-type: none"> <li>- We only store derived data Review, release or loss of data are not possible. Data reset is possible.</li> </ul>
<p>IP address</p>	<ul style="list-style-type: none"> <li>- Mobilengine Software has limited capacity to erase historic data recorded in the log files and in the database.</li> <li>- Erasure of the entire account is possible;</li> <li>- Based on a separate assignment, erasure of all data related to a certain period is possible.</li> </ul>
<p>GPS and other locational data</p>	
<p>Raw data: User data stored among the data registered during the usage of the Mobilengine Software</p>	
<p>Raw data: Personal data that may have been registered during the usage of the Mobilengine Software</p>	
<p>Historic data</p>	
<p>Log files: Set of files used for logging and tracking the processes, error messages generated, incoming and outgoing data on the Software mobile and server application of Mobilengine.)</p>	
<p>User reports (pdf summary, excel sheets, dashboards)</p>	
<p>User data (username, e-mail address, ID, password)</p>	
<p>GPS and other locational data</p>	
<p>Uploaded files, documents: uploaded to the Mobilengine Software</p>	
<p>Personal data not related to user data: personal data recorded of other private individuals recorded by the user</p>	

COMMUNICATION OF A PERSONAL DATA BREACH TO THE DATA SUBJECT

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

The communication to the data subject shall describe **in clear and plain language** the nature of the personal data breach and communicate the name and contact details of the data protection officer or other contact point where more information can be obtained; describe the likely consequences of the personal data breach; describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject shall not be required if any of the following conditions are met:

- the controller **has implemented appropriate technical and organisational protection measures**, and those measures were applied to the personal data affected by the personal data breach, in particular those that **render the personal data unintelligible** to any person who is not authorised to access it, such as encryption;
- the controller has taken subsequent measures **which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise**;
- **it would involve disproportionate effort**. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so.

### NOTIFICATION OF A PERSONAL DATA BREACH TO THE SUPERVISORY AUTHORITY

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

### MAKING A COMPLAINT

Complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information in case of infringement of controller.

Hungarian National Authority for Data Protection and Freedom of Information

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Postafiók: 5.

Phone number: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)