

## **\*\*Privacy Policy\*\***

The "Data Controller" or "Company" is committed to handling personal data with the utmost care. Accordingly, the Data Controller has developed its data management, data processing, and data deletion regulations and internal system to protect personal data in compliance with legal requirements, considering its activities, legal obligations, and the nature of its relationships with clients and partners.

This notice provides a detailed description of how and for what purposes the Data Controller processes your (hereinafter referred to as the "Data Subject") personal data and the rights you are entitled to concerning your data managed by the Data Controller.

### **\*\*The Data Controller\*\***

Data of the Data Controller:

Name of the representative: Béla Török

Email address: [contact@zeroitlab.com](mailto:contact@zeroitlab.com)

### **\*\*Relevant Legislation on Data Processing\*\***

The Data Controller adheres to the provisions of data protection laws regarding the processing of personal data of natural persons during its data processing activities. The principles of the Data Controller's data processing comply with the following laws:

- 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, "GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Infotv.");
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services ("Eker tv.");
- Act LXVIII of 2008 on the basic conditions and certain limitations of economic advertising activity ("Grt").

For any issues not or not fully regulated in this notice, the provisions of the GDPR, the Infotv., and other laws listed above shall apply.

### **\*\*Amendment of the Notice\*\***

The Data Controller reserves the right to unilaterally amend this notice. The current version of the notice is available on the website operated by the Data Controller.

### **\*\*Definitions\*\***

For the purposes of this notice, the following terms shall mean:

- "Processor": a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Data Controller;
- "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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;
- "Restriction of processing": the marking of stored personal data with the aim of limiting their processing in the future;
- "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;

- "Data transfer": making data available to a specific third party;
- "Data deletion": making data unrecognizable in such a way that its recovery is no longer possible;
- "Data breach": a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed;
- "Recipient": a natural or legal person, public authority, agency, or another body, to whom or 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;
- "Third party": a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- "Website": the website operated by the Data Controller at zeroitlab.com and its subpages;
- "Processing based on legitimate interest": processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party;
- "Representative": a natural or legal person established in the Union who, designated in writing by the controller or processor pursuant to Article 27 of the GDPR, represents the controller or processor with regard to their respective obligations under this Regulation;
- "Profiling": any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements;
- "Relevant and reasoned objection": an objection to a draft decision as to whether there is an infringement of this Regulation, or whether the intended action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;
- "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 necessary for the performance of a contract": processing necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract.

#### **\*\*Cookie Notice\*\***

The Data Controller informs visitors to the website that data collection and data processing occur through the use of anonymous user identifiers ("cookies") and their acceptance by the Data Subject when using the website (in the absence of web-based contact).

Cookies do not contain any personal data and are not capable of identifying individual users.

Cookies may be "permanent" or "temporary". Permanent cookies are stored by the browser until a specified date

unless deleted by the user beforehand, whereas temporary cookies are not stored by the browser and are automatically deleted when the browser is closed.

With the help of cookies, the browser can be uniquely identified, and the website remembers the user's actions and personal settings for a certain period (e.g., username, language, font size, and other display settings), and stores the fact and time of visiting the given page. This way, you do not have to re-enter them each time you visit our website or navigate from one page to another on our website.

In general, "cookies" and other similar programs make it easier to use the website, help the website provide a real web experience and an effective source of information for visitors, and ensure the proper functioning of the site, prevent abuse, and provide uninterrupted and adequate quality services on the site for the website operator.

Type of Cookie	Purpose of the Cookie	Legal Basis for Data Processing	Retention Period
Google Analytics	The Website uses the Google Analytics tool to collect and analyze data on how users utilize the Website. This data is used to compile reports and improve the Website. The data is collected in a non-personally identifiable form, such as the number of users, where they came from, and which pages they viewed on the Website. Based on the data collected, users cannot be identified. To view Google's privacy policy, <a href="#">click here</a> .	User consent.	Google Analytics cookies are created when the user visits a website with an active Google Analytics tracking code. The cookies are stored by the user's browser for up to 2 years from the date of creation.  For more information, <a href="#">click here</a> .
Session Identifier (Website Language)	Session cookies enable the recognition of the user's chosen language settings on the Website.	Mandatory acceptance.	The data is retained by the system until the end of the given session. Thereafter, the collected data will no longer be available.
Meta Pixel	The Meta Pixel is a code that enables the Website to generate reports on conversions, create target audiences, and provide detailed analytical data to the site owner about visitor usage. The Meta remarketing pixel tracking code allows the display of personalized offers and advertisements to website visitors on the Meta platform. The Meta remarketing list is not suitable for personal identification.	User consent.	For more information about the Meta Pixel, <a href="#">click here</a> .

## Accept/Disable Cookies

### Acceptance and Authorization of Cookie Usage

Accepting or enabling the use of cookies is not mandatory. You can refuse the use of cookies through the settings of your computer or other device used for browsing, or through the browser settings you use to access the Website. In such cases, some pages may not display properly, and the system may inform you via a message that cookies need to be enabled to view the website.

Without the use of cookies, we cannot guarantee the full use of the website for you. Names, headquarters, and data processing tasks of data processors related to cookies:

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States, detailed information on analytical data processing: [Google Privacy Policy](#)

Otherwise, technically recorded data includes the data of the computer logging into the Website, which is generated during browsing and automatically logged by the Data Controller's system as a result of technical processes (e.g., IP address, session ID). Due to the nature of the Internet, automatically recorded data is logged automatically by the system without the user's separate declaration or action – through the use of the Internet. The Internet does not function without these automatic server-client communications. These data cannot be combined with other personal data – except in cases required by law. Only the Data Controller has access to these data. Automatically recorded log files during the operation of the Website are stored for the justified duration necessary for ensuring the operation of the Website.

### Purpose of Data Processing, Scope of Data Processed, Duration of Data Processing

The Data Controller always processes personal data solely for specific purposes, to the necessary extent, to exercise rights, and to fulfill obligations. Each stage of data processing must comply with the purpose of data processing, and the collection and processing of data must be fair and lawful. Personal data can only be processed to the extent and for the duration necessary to achieve the purpose.

### Contact

Activity Related to Data Processing	Contacting the Data Controller via the "Contact" webpage or by sending an email to the provided contact email address.
Data Subject	User utilizing the "Contact" function on the Website or user sending an email.
Scope of Personal Data Processed	<ul style="list-style-type: none"><li>• Name</li><li>• Email address</li><li>• Optionally: company name, phone number, and any other personal information provided by the user.</li></ul>
Purpose of Data Processing	To establish contact. Managing messages, sending responses.
<b>Duration of Data Processing</b>	Until the data subject withdraws their consent.
Legal Basis for Data Processing	Voluntary consent of the data subject.

## Event Registration

Data Subject: Applicants	Applicants
Scope of Personal Data Processed:	<ul style="list-style-type: none"><li>• Name of the applicant</li><li>• Employer of the applicant</li><li>• Position of the applicant</li><li>• Email address of the applicant</li><li>• Phone number of the applicant</li><li>• Data related to food allergies and intolerances of the applicant</li></ul>
Purpose of Data Processing:	To facilitate registration for events hosted by the Data Controller, manage the events, and maintain contact with participants.
Duration of Data Processing:	Until the conclusion of the event
Legal Basis for Data Processing:	Voluntary consent of the data subject during registration

### 6.3 Photos and Videos Taken at Events and Trainings

Activity Related to Data Processing:	Organization of events hosted by the Data Controller
Data Subject:	Applicants
Scope of Personal Data Processed:	<ul style="list-style-type: none"> <li>• Videos of participants</li> <li>• Photos of participants</li> </ul>
Purpose of Data Processing:	Promotion and publicity of events and trainings on the Data Controller's websites and social media platforms.
Duration of Data Processing:	Until the legitimate interest ceases, or until a successful written objection is submitted by the data subject.
Legal Basis for Data Processing:	Legitimate interest

### Job Application

Activity Related to Data Processing:	Filling positions advertised by the Data Controller
Data Subject:	Job applicants
Scope of Personal Data Processed:	<ul style="list-style-type: none"> <li>• Applicant's name</li> <li>• Applicant's email address</li> <li>• Applicant's phone number</li> <li>• Additional personal data provided in the CV (e.g., date of birth, photo, etc.)</li> </ul>
Purpose of Data Processing:	Selection of potential candidates
Duration of Data Processing:	Until the written withdrawal of consent.
Legal Basis for Data Processing:	Voluntary consent of the data subject.

### Offer Submission, Contract Conclusion, Project Implementation

Activity Related to Data Processing:	Services provided within the Data Controller's business activities
Data Subject:	Employees, collaborators, and project participants of the client
Scope of Personal Data Processed:	<ul style="list-style-type: none"> <li>• Client (organization) name</li> <li>• Registered address</li> <li>• Mailing address</li> <li>• Name of the client's contact person</li> <li>• Contact person's email address</li> <li>• Contact person's phone number</li> </ul>
Purpose of Data Processing:	Communication related to offer submission, contract conclusion, and projects, sending documents.
Duration of Data Processing:	Until the enforceability of claims arising from the contract.
Legal Basis for Data Processing:	Legitimate interest

## Newsletter Subscription

Activity Related to Data Processing:	Newsletters and service notifications sent by the Data Controller for marketing purposes
Data Subject:	Employees, collaborators, and project participants of the client
Scope of Personal Data Processed:	<ul style="list-style-type: none"><li>• Data subject's name</li><li>• Data subject's email address</li></ul>
Purpose of Data Processing:	Distribution of the Data Controller's marketing materials via email, promotion of events, and sending newsletters and notifications to data subjects.
Duration of Data Processing:	Until the written withdrawal of consent.
Legal Basis for Data Processing:	Data subject's voluntary consent

## Rules of Data Processing

If data processing serves multiple purposes, consent must be given for all purposes of data processing. If data processing is not required for the performance of a contract, compliance with a legal obligation, or based on legitimate interest, then personal data can only be processed with the explicit consent of the Data Subject. The Data Subject has the right to withdraw their consent at any time. However, the withdrawal of consent is only effective for data processing based on consent and does not affect data processing carried out on other legal grounds. The withdrawal of consent does not affect the lawfulness of data processing that occurred prior to the withdrawal.

## Access to Data and Data Transfer

The Data Controller has developed IT support in line with the purpose of data processing, ensuring that only individuals who need to process the personal data have access to it. Additionally, if required by the legal basis of the data processing, the Data Controller is entitled and obligated to transfer or make the data accessible to the authorized party. The Data Controller may transfer the personal data it processes to service providers in a contractual relationship with the Data Controller, to the extent and for the duration necessary for these individuals to perform their tasks, but no more than the extent and duration specified for the data processing mentioned above.

## Data Processor

The Data Controller is entitled to engage a data processor in the performance of data processing activities throughout the entire period during which it holds the data.

When utilizing a data processor, the Data Controller mandates, as a contractual obligation, that the contracted data processor complies with GDPR regulations and maintains the required records to protect personal data.

The Data Controller employs the following Data Processor(s) for the specified activities related to personal data processing:

The Data Controller does not use a data processor

Transfers may take place in the following cases:

- in order to fulfil an obligation to provide data to public authorities or courts;

in cases where the data controller is required by law to provide data for the purposes of judicial or extrajudicial procedures;

for the performance or monitoring of a contract concluded or of obligations entered into in connection with a contract, where the Data Controller provides a service jointly with another partner.

The Data Controller shall provide information on the recipients of the transfers at the request of the data subject. The Data Controller shall ensure that the persons identified above handle the processing in compliance with the data protection rules in force at the time and with the legal provisions on confidentiality.

## **Deleting data**

The Data Controller shall continue to process the data to the extent and for the duration required by law or necessary to achieve the purpose of the processing in accordance with the Data Controller's current Data Management Policy. When the purpose of the processing ceases, the data shall be erased or, if it has the possibility to do so, anonymised in accordance with the principle of limited storage.

### Data security

The Data Controller shall retain in the course of processing.

confidentiality: it protects the information so that only those who are entitled to access it have access to it;

integrity: to protect the accuracy and integrity of the information and the processing method;

availability: it ensures that when the authorized user needs it, he has effective access to the information and the means to obtain it.

The Data Controller, as data controller or data processor in the scope of its activities, shall ensure the security of the data and shall take the technical and organizational measures and establish the rules necessary to enforce the GDPR and other data protection and confidentiality rules.

During the storage of data, the Data Controller shall ensure that the data cannot be accessed by unauthorized persons and that the confidentiality of the data is not compromised throughout the period of data processing. In particular, it shall take appropriate measures to protect the data against unauthorized access, alteration, disclosure, transmission, disclosure or deletion, accidental damage or loss, and against inaccessibility resulting from changes in the technology used.

The Data Controller shall at all times ensure an adequate level of data protection during the processing of the data, which shall be ensured or guaranteed by the implementation of various technical and organizational measures. These measures shall provide the level of protection required by the risks involved and the nature of the personal data and shall take into account the state of the art, the nature, scope, context and purposes of the processing and the risk to the rights and freedoms of natural persons caused by the varying likelihood and severity of the risks. To this end, the Data Controller shall use data management systems, develop and implement procedures to ensure that access to information is restricted to those who have a legitimate interest in the performance of the activities and to minimize the possibility of any unlawful use of information obtained in the course of the activities, other than for the purposes for which it was collected or in contradiction with those purposes.

## **Rights of the Data Subject and how to exercise them**

On the basis of the applicable legislation, the following may be requested from the Data Controller:

- \*Informing data subjects about the processing of their personal data;
- \*rectification of the Data Subject's personal data;
- \*erasure of the Data Subject's personal data (except for mandatory processing);
- \*request the portability of data;
- \*object to unauthorized processing or transfer;
- \*initiate the restriction of processing;
- \*initiate a legal remedy.

The Data Controller provides the following remedies to the Data Subject in the event of a breach of rights in relation to the processing of personal data:

You may request information about the processing of your personal data and request the rectification of your personal data. Upon request, the Controller shall provide information about the data it processes, the purposes, legal basis and duration of the processing, the name, address (registered office) and activities of the data processor in relation to the processing, as well as the persons who receive or have received the data and the purposes for which the data are received or have been received. The information shall be provided in writing and in an intelligible form within the shortest possible time from the date of the request, but not later than 30 days, unless a shorter time limit is laid down by law.

The personal data of the Data Subject will be deleted:

- \*if its treatment is unlawful,
- \*if the Data Subject requests it (unless the processing is based on a mandatory legal provision),
- \*where the purpose of the processing has ceased to exist,
- \*where it is incomplete or
- \*inaccurate, and this situation cannot be lawfully remedied, provided that erasure is not excluded by law,
- \*if the statutory time limit for the storage of the data has expired,
- \*if it has been ordered by a court or the National Authority for Data Protection and Freedom of Information.

The Data Controller will notify you of the rectification and erasure. The notification may be omitted if this does not harm the legitimate interests of the data subject having regard to the purposes of the processing.

In the context of the right to restriction of processing, the Data Subject has the right to request the restriction of his or her personal data processed by the Controller, among others, if:

- \*contests the accuracy of the personal data,
- \*the processing is unlawful, but the Data Subject opposes the erasure of the data,
- \*the purpose of the processing is fulfilled but the Data Subject requires the personal data for the establishment, exercise or defense of legal claims,

Under the right to data portability, the Data Subject has the right to receive his or her personal data processed by the Controller in a structured, parsed, commonly used, machine-readable format, to transmit such data to another controller; provided that:

- \*the processing of personal data is based on the data subject's consent or is necessary for the performance of a contract, and
- \*the processing is carried out automatically.

The Data Controller may withdraw his or her consent at any time with regard to the personal data processed by the Data Controller on the basis of the Data Subject's consent, without prejudice to the lawfulness of the processing carried out on the basis of the consent prior to the withdrawal. The Data Subject may object to the processing of his or her personal data if

- \*processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party,
- \*the exercise of the right to object is otherwise permitted by law.

The Data Controller shall examine the objection within the shortest possible period of time from the date of the request, but not later than 30 days, unless a shorter period is provided for by law, and shall inform the applicant in

writing of the outcome of the examination. If the Data Controller finds that the objection is justified, it shall cease the processing, including further collection and further transmission, and block the data, and shall notify the objection and the action taken on the basis of the objection to all those to whom it may have previously disclosed the personal data concerned by the objection and who are obliged to take measures to enforce the right to object.

If the Data Controller does not agree with the decision of the Data Controller, or if the Data Controller fails to comply with the time limit provided for in the Data Protection Act, the Data Controller may take the matter to court within 30 days of the notification of the decision or the last day of the time limit.

National Authority for Data Protection and Freedom of Information (Supervisory Authority)

The Data Subject may lodge a complaint about the processing of his or her personal data with the National Authority for Data Protection and Freedom of Information (NAIH) (address: H-1055 Budapest, Falk Miksa utca 9-11., postal address: 1374 Budapest, PO Box 603; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or with the data protection authority of his or her place of nationality or residence.

If your rights have been infringed, you can also take your complaint to court, regardless of whether you have lodged a complaint with the NCA, as provided for in the Data Protection Act. Depending on the decision of the Data Subject, the proceedings may be brought before the competent court of the Data Subject's permanent or temporary residence. It may be advisable to discuss the complaint with the Data Controller before initiating legal proceedings.

The Data Subject's rights and remedies are set out in detail in Sections 14-18 and 21-23 of the GDPR and Articles 15-21 of the EU General Data Protection Regulation (GDPR).

Budapest, 1 January 2022.