
PRIVACY POLICY

1. NAME OF THE CONTROLLER

Description of the Controller:	iData Kft.
Controller's corporate registration number:	Cg.01-09-864260
Controller's registered seat:	1103 Budapest, Gergely utca 112/C.
Controller's e-mail address:	info@idata.hu
Controller's representative:	Lajos Szabó, András Szabó
Data protection officer:	Krisztina Vass

2. RULES OF DATA PROCESSING

IData Kft. (hereinafter: Company) processes the personal data of its customers and other natural persons based on its privacy and data security policy. The scope of the policy covers all processes at the Company's organizational units where personal data are processed under article 3 (2) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Info Act") and Regulation 2016/679 of the European Parliament and the Council („GDPR”).

The terms of the policy are identical with the terms defined in the Info Act and in the GDPR.

The Company processes personal data only for the previously defined, lawful and specific purpose, in order to exercise rights and fulfill obligations, to the minimum extent and for the minimum period required for fulfilling the purpose. Data processing shall comply with the purpose at all stages – the Company shall erase the data if the purpose of data processing ceased to exist or data processing is otherwise unlawful.

Prior to collecting data, the Company shall in all cases notify the data subject about the purpose and the legal ground for data processing.

The Company's employees processing data at the organizational units and the employees of organizations taking part in, or carrying out a part of data processing upon order by the Company shall handle the accessed personal data as business secrets. The persons accessing and processing personal data shall make a Confidentiality Declaration.

If anyone processing data in the name of the Company finds that the personal data processed by the Company are erroneous, deficient or untimely, s/he shall correct them, or initiate correction by the colleague responsible for data recording.

The Company cooperates with data processors within the circle specified in paragraph 4, who cooperate in data processing in the name of, and under control by the Company, subject to the Company's full liability as controller. The Company shall enforce the privacy obligations of the data processors - laid down in the Info Act and in the GDPR - in the service contract signed with the data processors.

The Company's leading official shall at all times specify the data protection organization in consideration of the Company's specific features as well as the tasks and scopes of data protection and the related activities, and appoints a person to supervise data processing.

The Company's associates shall ensure during their work that unauthorized persons do not access personal data, and personal data are placed and stored in a manner that they cannot be accessed, learned, changed or annihilated by unauthorized persons.

The Company takes efforts – in order to comply with the GDPR – in order to minimize personal data processing, to pseudonymise personal data as soon as possible, to provide for the transparency of the functions and processing of personal data, to enable the data subjects to track data processing and to enable the Company to create and improve security features.

The Company deals with no automated data processing, also including profiling.

The Company's data protection system is supervised by the leading official through a data protection officer appointed or designated by him/her.

3. ENFORCING THE RIGHTS OF DATA SUBJECTS

You may request deletion of the processed personal data or restriction of their use if you believe that the personal data are no longer required for the purpose of collection or other manner of processing, or you believe that the personal data are processed unlawfully.

In addition, you may at any time protest against data processing for any reason related to your own situation. In the case of protest, the Company may no longer process the personal data for marketing purposes, and for other purposes only if it is proven that data processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or they are related to submitting, enforcing or defending legal claims. The limitation of data processing may also be requested simultaneously with the protest.

Finally, you may also request limitation of data processing if you dispute the accuracy of the personal data, and in this case the limitation shall refer to the period that enables the controller to verify the accuracy of the personal data.

You may request information from us about what personal data we process, for what purpose, in what manner and you may request copies of the data stored by the employer. Such requests are fulfilled free of charge on the first occasion for each data.

For the sake of data protection, your rights of disposal and access can only be exercised after previous personal identification. In case of such a request, please get in touch with us at the following contacts:

- Electronically: info@idata.hu
- By mail: iData Kft., 1103 Budapest, Gergely utca 112/C

Complaints about the lawfulness of data processing and proposals for actions regarding data processing are also received at these contacts.

In the event where the Company acts as a data processor, the data processing-related rights of the data subjects are provided based on the controller's decisions. At the same time, the Company immediately forwards to the controller the legal declarations and instructions received in this regard.

Complaints may be submitted to, and legal remedy is available at the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, 1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1374 Budapest, Pf.: 603.) or at the court competent at your address or residence.

4. DATA PROCESSORS AND FURTHER DATA PROCESSORS

Our Company uses data processors – as well as sub-data processors if we act as a data processor – for the following activities:

- Processing service-related customer data:
 - o Handling mail deliveries
- Online tracking, anti-theft service: remote monitoring
- In-house customer service: recording telephone calls
- Outsourced telephone customer service for road toll declarations: running telephone customer service
- Data processing related to arrears management

5. DATA PROCESSING FOR SERVICES

Processing customer data for GPS tracking

Purpose of data processing: Processing customer data – based on the service contract – for GPS tracking and forwarding them to the data processor for invoicing (invoice processing, printing and mailing)

Scope of the processed data: invoicing data:

Buyer customer number

Buyer's name

Buyer's address

Buyer's VAT number

All data of the buyer invoice: ordered product/service, its VTSZ/SZJ (customs tariff no./service register) number, quantity, unit price, net and gross value

Legal ground for data processing: contractual fulfilment

Deadline of data storage: 2 years after the termination of the service contract, for invoicing data: the termination of the right to charge rates and taxes

Method of data storage: On paper and electronically

Online tracking

Tracking contracting partners and their employees based on the service contract. The contracting partners can register on iData Kft.'s internet platform by downloading the

customer programme and entering the user name and the password. Data are processed on the iData Kft. platform, the process involves iData Kft., as data processor, accessing the given vehicles' registration number, positioning data and – if provided by the registered user (not obligatory) – the name of the vehicle's driver.

Private-corporate switch

In the event of service contracts with companies, the customers register on iData Kft.'s platform similarly to the previous paragraph. The Company can access the same data as in the case of online tracking. The purpose of tracking is that the customer can check the company car usage by the driver for private purposes in a manner that the driver's rights to privacy and personal data are not injured.

Other GPS tracking-related services

Tracking work time, fuel consumption, work time usage and temperature, as well as commodity protection.

The procedure is the same as in both cases above.

In the above data processing activities, iData Kft. acts as a data processor, whereby personal data are processed for customers as controllers based on the service contract signed with the customers.

Purpose of data processing: GPS tracking for the customers based on a service contract, after registration at iData Kft.'s website

Scope of the processed data: Registration number, name of the driver of the vehicle equipped with GPS, positioning data

Legal ground for data processing: contractual fulfilment

Deadline of data storage: 2 years after the termination of the service contract, for invoicing data: the termination of the right to charge rates and taxes

Method of data processing: Electronic

Protection against theft

Similarly to online tracking, a service contract is signed with the customers, with the difference that contracts are also concluded with private persons. In this case, iData Kft. acts as a **controller**.

Purpose of data processing: GPS tracking of customers for protection against theft, based on a service contract, after registration at iData Kft.'s website

Scope of the processed data: Registration number, name of the driver of the vehicle equipped with GPS, positioning data

Legal ground for data processing: contractual fulfilment

Deadline of data storage: 2 years after the termination of the service contract, for invoicing data: the termination of the right to charge rates and taxes

Method of data processing: On paper and electronically

Data processing for road toll declaration

After signing the contract, iData Kft. and BetaBlue act as participants in the procedure for road toll declarations. Declarations can be made through an on-board unit (OBU). BetaBlue Kft. acts as a data processor when attending the declaration procedure, having access to the registered customers' registration plate number and the route, the amount paid and – if provided by the customer – the driver's name, e-mail address and telephone number.

Purpose of data processing: Cooperating in fulfilling the customers' obligatory road toll declaration based on BetaBlue Kft.'s General Terms and Conditions

Scope of the processed data: registration plate number, positioning data, amount paid by the registered customers, name, e-mail address and telephone number of the driver of the vehicle with GPS

Legal ground for data processing: contractual fulfilment

Deadline of data storage: 2 years as specified in the GTC of the National Toll Payment Services Plc. (Nemzeti Útdíjfizetési Szolgáltató Zrt.), for invoicing data: the termination of the right to charge rates and taxes

Method of data processing: Electronic

Data processing for parking

iData Kft. mediates mobile parking services through the GPS unit installed in the customers' vehicles, based on service contracts.

Purpose of data processing: Fulfilling the customers' parking fee payment obligation to the National Mobile Payment Plc. (Nemzeti Mobilfizetési Zrt.) based on service contracts

Scope of the processed data: Registration plate number, positioning data, email address

Legal ground for data processing: contractual fulfilment

Deadline of data storage: 2 years after the termination of the service contract, for invoicing data: the termination of the right to charge rates and taxes

Method of data processing: Electronically and on paper

Liaising with buyers, partners and suppliers

Request for quotation, reply to quotation, preparation of contract, management and registration of contact details, keeping personal contact, reconciliation of contact details and updating of data.

The legal basis for data processing: Legitimate interest – It is in the Controller's legitimate interest to record contact details necessary for the performance of the contracts.

The scope of data processed: Name, address, email address, phone number, position, company name

Source of data: Partner company / buyer's employee or partner company's website

Planned duration of data processing: The last working day of March of the 4th year following the termination of the partnership contract or until objection by the Data Subject.

Method of data processing: electronically as well as on paper

Advertising the service(s), provision of information to the target audience in the context of direct marketing

Advertising or direct marketing or marketing communication matching the interests of the targeted client concerning new or renewed services, sending newsletters, measuring customer satisfaction, invitation to a marketing event or conference.

The legal basis for data processing: Legitimate interest – Direct marketing is in the controller's legitimate interest.

The scope of data processed: email, name

The data subject disclosed the following data to the controller while using a service. The Controller hereby informs the data subject that the data processed during the activities defined as "liaising with buyers, partners and suppliers" has been reclassified on the grounds of legitimate interest and such data will be used for direct marketing purposes.

Source of data: The Controller has lawfully processed the data of the Data Subjects for other data processing purposes.

Planned duration of data processing: Until the Data Subject objects to it.

Method of data processing: electronically as well as on paper

Data processing for customer service

Upon providing services, the Company intends to make sure that its customers can enforce their rights to receive information and legal remedy under the provisions of the Consumer Protection Act.

Customer service data are processed for BetaBlue Kft. by iData Kft. as a data processor.

At the customer service the customers can manage their matters and submit complaints regarding the Company's services.

Issues may be managed personally, on the telephone and in writing. Written contacts can be made both by mail and electronically.

Complaint management

Clients may make complaints as follows:

Oral complaint:

- a) Personally, at the customer service and the branch offices of iData Kft. during customer service hours; and
- b) On the telephone

The telephone calls are recorded under the consumer protection regulations.

The customers may also mandate a representative to manage their matters, which only requires a written authorization under Act V of 2013 on the Civil Code. In this case, the representative's data are also processed by the Company.

If the data subject disagrees with the complaint management or the complaint cannot be investigated immediately, minutes are taken and printed from the customer registration. The Company shall deliver a copy of the minutes to the consumer.

The minutes taken about the complaint shall contain the following:

- Customer's name;
- Customer's address/registered office, if necessary, mail address;
- Place, date and method of submitting the complaint;
- Detailed description of the complaint, by recording the complaint-related objections separately so that all objections laid down in the customer's complaint are fully investigated;
- Number of contract affected by the complaint, customer number depending on the case;
- List of documents and other evidence presented by the customer;
- Signature of the person taking the minutes and the customer (the latter is required if the complaint is made personally);
- Place and date of drawing up the minutes.

Reports not made personally

Non-personal reports are made on the telephone or in writing.

- a) On the telephone,
- b) By mail,
- c) Or via e-mail to the info@idata.hu address.

Client service on the telephone

The Company runs a telephone customer service. All oral complaints made on the telephone to the customer service and telephone communication between the agent and the customer are recorded.

All recordings are supplied with an individual ID number and stored for 5 years. Upon request, the recording is delivered to the customers free of charge.

The Company shall store the minutes taken about the complaint and a copy of the response for 5 years and present them to controlling authority if requested.

Common rules

The customer service shall always lay down in writing the Company's opinion about the complaint and shall notify the consumer about the actions taken, together with reasons, within 15 days after receiving the complaint, except where the customer notifies the Company about the complaint in writing and the Company takes actions without delay.

Purpose of data processing: Complaint management related to services

Scope of the processed data: The customer's name; address / registered seat, if necessary, mail address; the place, date and method of submitting the complaint; detailed description of the customer's complaint by separately recording the objections affected by the complaint to ensure that all objections mentioned in the customer's complaint are fully

investigated; number of the contract affected by the complaint, customer number, depending on the case; list of papers, documents and other evidence presented by the customer; signature of the person taking the minutes and the customer (the latter is required for personally made oral complaints); place and date of taking the minutes

Legal ground for data processing: Consent by the data subject under article 5 (1) a) of the Info Act, with the legal ground set forth in article 17/A-C of the Consumer Protection Act and article 6 (1) a)-c) of Regulation 2016/679 of the European Parliament and the Council.

Deadline of data storage: The Company shall store the minutes taken about the complaint, a copy of the response and the recording supplied with an individual ID number for 5 years [article 17/A (7) and 17/B (3) of the Consumer Protection Act].

Method of data processing: On paper and electronically

Data processing for arrears management

Users who are late with payment receive a payment demand specifying the legal consequences. The demand is sent in mail with a return receipt. Should this be unsuccessful (failure to pay, absence of request for permit to pay in instalments) the Company sends another payment demand with a notice receipt, indicating the payable amount.

After, or parallel with the unsuccessful demands, the Company starts a collection procedure, by considering the expected result, consisting of a payment demand stage and, if necessary, a collection stage.

The data on customers in arrears are forwarded to lawyers, notaries public and court executors.

Purpose of data processing: Handling customer data for arrears management in the controller's service field

Scope of the processed data: name; name at birth; mother's name; place and date of birth; permanent address; telephone number; mail address; e-mail address; legal title and the amount of the arrears.

Legal ground for data processing: article 6 (1) b) of Act CXII of 2011 and article 6 (1) b) of Regulation 2016/679 of the European Parliament and the Council.

Deadline of data storage: Payment of the arrears or lapse of the arrears-related civil law claims (5 years)

Method of data storage: On paper and electronically