

# PRIVACY POLICY

This document will (hereafter: privacy policy) inform you as the visitor and/or user of our website and our services about the data processing and data protection rules.

**What core principles do we adhere to during the data processing?**

## **MicroStation 44 s.r.o. follows the following core principles:**

- a) we process your personal data lawfully, fairly and transparently for you;
- b) we only collect personal data for predetermined, clear and lawful goals and we do not handle your data in ways that are contradictory to those goals;
- c) data collected and processed by us are suitable and relevant for the data processing and are limited to the necessary minimum;
- d) our Company will take all reasonable steps in order to ensure the accuracy, availability; we will immediately delete or correct all inaccurate data;
- e) we store your personal data in such a form that will make your personal data identifiable only for the time necessary for reaching our goals;
- f) we will apply appropriate technical and organizational policy to ensure the security of your personal data and to ensure their protection against lawless or illegal manipulation, involuntary loss, destruction and corruption.

## **Our Company will**

- a) collect , manipulate, record, organize, store and use your data based on your prior permission and to the minimally necessary extent;
- b) in some cases the handling of your data is based on legal requirements and is of compulsory character, in these cases we will specially draw attention to this fact;
- c) in certain cases our Company or a third party may have a legal claim on the handling of your data, e.g. operation, development and security of our website,

**Who we are?**

## **Name of our Company: MicroStation 44 s.r.o.**

Seat: 945 05 Komárno, Hviezdna 11/20.  
Webpage: [www.smartproject.app](http://www.smartproject.app)  
Postal address: 945 05 Komárno, Hviezdna 11/20  
Telephone: +36207755635  
E-mail address: [1nf0@smartproject.app](mailto:1nf0@smartproject.app)  
Tax number: SK2120598865  
Business ID: 51137470

**Data protection officer:**

Óvári Zoltán

E-mail address:

[1nf0@smartproject.app](mailto:1nf0@smartproject.app)

In order to provide a high quality of services our company will in the process of data handling employ the following data processors:

<b>Name</b>	<b>Address</b>	<b>Capacity</b>
Mózes Csaba	2330 Dunaharaszti Csók István 9/c	<i>IT services</i>
MIRADOR s.r.o.	94505 Komárno, Hviezdna 11/20.	<i>bookkeeping</i>

As soon as we will amend the list of data processors we will list the changes here.

**Data handled by us:**

<b>Name of the action</b>	<b>Legal title</b>	<b>Handled data</b>	<b>Duration</b>
<b>Visit of the website</b> <ul style="list-style-type: none"><li>● Goal: correct and high quality service of our website, monitoring and improvement of quality of our services</li></ul>	Lawful interest of our Company	<ul style="list-style-type: none"><li>● IP address</li><li>● time of visit</li><li>● data about the visited subpages,</li><li>● your operating system and web browser type</li></ul>	3 months
<ul style="list-style-type: none"><li>● identification of rogou users attacking our website</li></ul>			
<ul style="list-style-type: none"><li>● recordkeeping of number of visits and statistical records</li></ul>			

<b>Registration</b> <ul style="list-style-type: none"> <li>● Goal: To provide a holistic user experience</li> <li>● outage notifications, company contact information updates, stb.</li> </ul>	consent	<ul style="list-style-type: none"> <li>● last name,</li> <li>● first name,</li> <li>● e-mail address,</li> <li>● telephone number</li> </ul>	until the cancellation of the registration or until the withdrawal of consent
<b>Newsletter service</b> <ul style="list-style-type: none"> <li>● Goal: maintenance of contact,</li> <li>● notifications about new sales and products</li> </ul>	hozzájárulás	<ul style="list-style-type: none"> <li>● full name,</li> <li>● e-mail address,</li> <li>● <i>other, non required data fields, e.g. interests, residence, etc</i></li> <li>..</li> </ul>	newsletter unsubscription
<b>Usage of the app or web app</b>	contract and consent	<ul style="list-style-type: none"> <li>● full name,</li> <li>● e-mail address,</li> <li>● telephone number</li> <li>● ID document and ID document number</li> </ul>	contract cancellation, until the cancellation intent notice from the contracting party
<b>Query responses, complaint response</b> <ul style="list-style-type: none"> <li>● responses to suggestions and complaints</li> </ul>	legal requirement	<ul style="list-style-type: none"> <li>● full name,</li> <li>● e-mail address,</li> <li>● telephone number,</li> <li>● correspondence address,</li> <li>● other personal note</li> </ul>	5 years

We only request personal information from our visitors if they intend to sign up and sign in.

We do not merge data obtained for marketing services and registrations. It is not our primary goal to identify our visitors.

With regards to data handling you can request further information via email ([inf0@smartproject.app](mailto:inf0@smartproject.app)) or via our correspondence address. We will send our response within 30 days to the contact address provided by you.

#### **What are cookies and how do we treat them?**

Cookies are small data files, which get to your computer through our website by your browser downloading and saving them.

The majority of the most common web browsers (Chrome, Firefox, stb.) by default accepts and allows the downloading and usage of cookies. It is, however, dependent on you whether by editing your preferences of your browser you will reject or disallow them, or whether you will delete the already downloaded cookies. You can get more information about cookies in the help section of your browser.

Certain cookies do not require your prior consent. We will give a short briefing about these during the start of your first visit to our website. Cookies like these include verification, multimedia player, load balancer, user interface customization and user centered security cookies.

With regards to cookies requiring your consent we will inform you about them at the start of your first visit - in case the data handling starts - to our website and will request your consent.

Our company does not use and allow cookies that allow third parties to collect data about you without your consent.

You are not obliged to allow cookies, although our company cannot guarantee the correct functionality of our webpage in case of their absence

#### **Which cookies do we use?**

Type	Name	Consent	Description	Goal	Validity
<i>system cookies</i>		<i>does not require</i>	<i>session cookie of the firewall of the web app, which provides prevention against cross site reference forgeries</i>	<i>normal functioning of the page</i>	<i>until the end of browser session</i>
<i>tracing cookies</i>		<i>requires</i>	<i>customization</i>	<i>Storage of your preferences and enhancing of the effectivity of our services</i>	<i>30 days</i>
<i>tracking cookies by third parties</i>		<i>does not require</i>	<i>identification of new sessions and users; saved by the Google Analytics tracking app</i>	<i>connects to third party services</i>	<i>30 days</i>

You can get detailed information about third party cookies here: [www.google.com/policies/technologies/types/](https://www.google.com/policies/technologies/types/).

furthermore you can read more about data protection here <https://www.google.com/analytics/learn/privacy.html?hl=hu>.

## **What else you need to know about the data handling on our website?**

Your personal information is provided to us by you voluntarily during registration and during communication with our Company, therefore we ask you to pay attention to the trueness, correctness and accuracy of these information, as you are responsible for these. Incorrect, inaccurate or incomplete data can be an obstacle in the availability of our services.

In case you do not submit your own data but data of someone else, we consider it that you have obtained the necessary authorization.

You can withdraw your constant with data handling at any time:

- by deleting your registration,
- by withdrawing your consent with data handling, or
- by withdrawing the consent with handling or usage of any data submitted to us during registration, or by requesting their blockage.

For technical reasons we are able process your withdrawal of consent within a **30 day deadline**. However, we would like to kindly remind you that for reasons relating to compliance to legal requirements or practicing our legal interests we may handle certain data even after your withdrawal of consent.

In case you use misleading personal information, or when our visitors commit a criminal offence, or when our visitor attacks any system of our company, we will immediately delete the user's data after canceling their registration, or we will keep the data for the time necessary to establish the civil liability or the time necessary for the criminal process if this is needed.

## **What do you need to know about the direct marketing and newsletter data handling.**

By submitting a declaration during registration or by modifying your personal data (thereby unequivocally expressing your intention to consent) on the direct marketing and newsletter interface later have given us your consent to use you personal data for marketing purposes as well. In this case we will also handle your data for sending newsletters and/or direct marketing and will send you advertisements and other messages, informational material, offers and/or newsletters until withdraw your consent.

**You can consent to direct marketing and newsletter jointly or separately, and you can at any time withdraw these consents.**

We will always interpret the cancellation of registration as withdrawal of consent. We will not interpret the withdrawal of consent for direct marketing and/or newsletter as a withdrawal of consent for data handling with regards to our webpage.

What data and on what grounds do we keep after you have withdrawn your consent? In case of consents, each consent corresponds to a given goal, so the registration on the website and the registration for the newsletter are two separate goals, with two separate databases and the two are in no relation to one another.

For technical reasons we are able process your withdrawal of consent within a **30 day deadline**.

## **Other data processing questions**

We are only allowed to forward your data in limits set by legislation, in case of our data processors we bind them contractual conditions in order to prevent them from using your data for goals contradictory to the consent that you have given. More information on this can be found in point no. 2.

The courts, prosecution, and other authorities may contact our Company in order to subpoena data or documents. In these cases we are obliged to comply with their requests, but only to an extent essentially necessary for the fulfillment of their aim.

Our employees and contractors instrumental in the process of data handling and processing may under a condition of non disclosure to a predetermined extent to get to know your personal data.

We are protecting your data by appropriate technical and other measures, as well as ensuring it's security, availability; furthermore we protect it from unauthorized access, change, corruption and publication, as well as any other unlawful usage.

Within the organizational measure we restrict physical access, we are constantly training our employees, and we keep all paper based documents locked away with appropriate protection. With the technical measures we employ cryptographic methods, password-protection and anti-virus software. We would, however, like to direct your attention to the fact that data transmission through the Internet cannot be considered to be considered to be fully secure. Our company will do everything in order to make this process as safe as possible, but we cannot accept full responsibility for data transfers through our webpage, however, we adhere to strict rules in order to protect your data's security and in order to prevent illegal access to your data.

With regards to the security question we would like to ask you to properly save your password to our website and do not share this password with anyone.

## **What are your rights and which legal remedies are available for you?**

With regards to your data handling

- you are entitled to request informations,
- you are entitled to request correction, update and completion of data handled by us,
- you can protest your data's handling and can request its deletion and locking (except for mandatory data handling)
- you may resort to legal remedies in courts,
- you can submit a complaint with the regulatory authority as well as you can initiate a proceeding.

**Regulatory authority:**



Hraničná 12  
820 07 Bratislava 27  
Slovak republic

**Identification:**

Business number (IČO): 36064220  
Tax number (DIČ): 2021685985

**Secretariat of the office:**

+421 2 3231 3214

**E-mail:**

[statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

**Upon your request** we will provide you with information with regards to the data handled by us or by data processors commissioned by us in the in the following extent:

- the data,
- its source,
- the goal of the data handling and its legal ground,
- duration, and if this is not possible then about the aspects necessary to establish the duration,
- the name, address and information regarding the data processing of our data processors,
- data protection incidents, effects, counteractions as well as measures taken to prevent them,
- about the legal grounds and addressee of forwarding of your personal data, in case they are being forwarded.

We will answer your inquiry in at least 15 days and at most 1 month. This information is provided for free, except in case you have submitted an inquiry in the present year in an identical topic.

We will however refund the fee paid by you in case we have handled your data illegally, or when the request for information has led to a correction. We can only refuse your requests for information in cases set by statute by informing you of the statute and about the ways you can seek remedies in court and from the regulatory authorities. Our Company will notify you and everyone involved in data processing if your data is corrected, locked, marked or deleted, except for cases, when the absence of this notice does not counter your legal interes.

In case we do not comply with your request to delete or correct data, after 8 days from receiving your request (but 1 month at most) and do not provide a legal reason or explanation, you can seek remedy in court and at the regulatory authority.

If you raise a protest against our handling of your personal data, we will inspect your claim within 8 days (but maximum within 1 month) from the time we received your claim and will inform you of our decision in writing. In case we came to the conclusion that your protest is well grounded, we will cease all data handling including further data recording and forwarding and we will also inform about your protest and all the measures taken as its consequence all third parties who have been given access to your data and who are legally required to take steps in order to enforce your right to protest.

We will refuse to comply with your request, if we can prove, that the data handling was justified by legal grounds with priority to your interests, rights and freedom, or which are in relation to enforcement and protection of legal claims. In case you do not agree with our decision, or if we miss the deadline, you can after 30 days from the last day of the deadline or after you receive our decision resort to a remedy in court.

The decision on data protection cases falls within the jurisdiction of the courts, the process can be initiated upon the deliberation of the affected party to be started in the court corresponding to the temporary or permanent residence. Foreign nationals can file a complaint to the regulatory authority corresponding to the place of his residence as well.

**We would kindly like to ask you, in order to solve the problem as quickly as possible, to contact our Company first before seeking remedies in courts or contacting the regulatory authorities.**

#### **Amendments to the Privacy Policy**

Our Company reserves the right to amend this privacy policy any time; we will give notice to the interested parties about these changes. Notices with regard to the amendments of this Privacy Policy are published on our website [www.smartproject.app](http://www.smartproject.app).

**MicroStation 44 s.r.o.**