

Privacy Policy

Updated July 1st, 2022.

This Privacy Policy will help you better understand how we collect, use your personal information. If we change our privacy practices, we may update this privacy policy. If any changes are significant, we will let you know by email.

Terms we use in this Policy

Personal data – data of a person who can be identified by the use of such data. This Privacy Policy explains how we use the personal information you provide to us.

You, Yours – any natural person whose Personal data we process and to whom this Privacy Policy applies.

GDPR – 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).

Website – our website and its subpages: webcapital.hu

Recipients – entities to whom we may transfer a part of your personal data, in connection with the performance of certain activities or services by them on our behalf. They may not do anything about your personal data until we have instructed them to do so, and only to the extent we have indicated. They will store your personal data securely and only for as long as we indicate or as required by applicable law.

Cookies – the so-called Internet cookies, i.e. tiny information recorded by the server on your computer disc in the form of small text files.

Privacy Policy – this policy sets forth the principles governing cookies and processing and protection of personal data.



Data Collector

This site is owned and operated by **Webcapital LLD** ("we", "our" or "us") and this Privacy Policy discloses how we collect data, what information we collect, why we collect it and how we use it. We keep your personal data confidential and if you have questions about how we handle personal data, please let us know. The first point of contact for privacy aspects at our organization is the Data Protection Officer, who can be contacted via email: **contact@webcapital.hu** or via phone: **+36 70 636 5488.**

We reserve the right to make changes to this Privacy Policy (together with other related Webcapital GDPR documents), in accordance with the requirements and changes in European Union legislation and /or changes in the terms within the GDPR.

This Privacy Policy was updated on 01 June 2022 and the most recent version of the Privacy Policy can always be found on our website.

What personal data do we process?

1. Website visitors

Geo location, IP address and "cookies"
(more information about our cookie policy can be found here)

2. Job Candidates

Data collected by applying for an open job position or by sending an open application:

- Personal Information: name and surname, address, email, phone number
- Professional Data: Cover Letter and CV/Resume

3. Potential Clients

Name and surname, email and/or phone number, message



We process and store personal data for a limited time as follows: for website visitors: 26 months, for job candidates - 2 years, for clients - 5 years.

Why do we process personal data?

Depending on collected data, we process the personal data in order:

- 1. to comply with a legal obligation
- 2. to be able to implement and perform our services
- 3. to give you the information needed
- 4. for marketing purposes or messages about our services
- 5. to enable us to be practical and efficient using cookies
- 6. to process a job application

All gathering of personal data is based on either:

- 1. consent of the person sharing the data;
- 2. the execution of a contract to which the data subject is party;
- 3. compliance with a legal obligation
- 4. the legitimate interest of Webcapital or a third party
- 5. the vital interest of the data subject or another person, or the public interest

We will not use the data for any purpose nor on any basis other than those listed above. If we need to process personal data for reasons other than those mentioned above, we will explicitly ask for your permission.



We also collect your information that you make available to us when you cooperate with us, or use our services, which are necessary for the execution of the contract), and we process them for the duration of our contractual relationship. This includes data necessary for the delivery of contracted services, and the issuance of invoices, data proving the authority to enter into a contract, and data collected during communication with us (e.g. contact information).

Social media

All data gathered through Webcapital's social media which can be considered personal data pursuant to the GDPR is processed in accordance with this Privacy policy in a manner prescribed by law. Specifically, Webcapital's can be found on the following social media whose privacy policy is linked below:

Facebook, LinkedIn, Instagram.

Third-parties data processing

In the context of the quality of our services, we can make use of the services of third parties which consist of our contractors and suppliers. In regard to data protection, they have the role of processors or subprocessors, who process the personal data on the basis of our exact order. If these third parties have access to the personal data or they themselves record and/or otherwise process, we conclude a DPA with those third parties. This means, among other things, that these third parties may only process your personal data for the aforementioned purposes.

We use <u>Google Analytics</u> for internet analytics, their privacy policies are linked here.

We will only process and store the personal data within the European Economic Area, unless otherwise agreed in a written contract. Exceptions to this are situations in which we want to map contact moments via our website. Your data will be stored by third parties outside the EU when using Google Analytics, and we suggest that you read their Privacy Policy via the corresponding link.



In connection with the processing activities described in this Policy, your data may be transferred to and/or processed in countries outside of the EU and the European Economic Area ("EEA"). The US and other countries may have data protection laws that differ from the laws of your country. In these cases, we provide appropriate safeguards to protect your personal data pursuant to Article 45 and 46 of the GDPR. These safeguards include compliance with the European Commission's standard contractual clauses for transfers of personal data and reliance on the appropriate legal framework.

Security

We have taken appropriate organizational and technical measures for the protection of the personal data, insofar as these can reasonably be required of us, taking into account the interest to be protected, the state of the technology, and the costs of the relevant security measures:

- 1. our employees and any third parties who necessarily have access to the personal data are obliged to confidentiality
- 2. our employees have received a correct and complete instruction on the handling of personal data
- 3. our employees are sufficiently familiar with the responsibilities and obligations according to the GDPR
- 4. we do not tolerate situations that can bring Webcapital into violation of laws and regulations

If there is a data leak incident regarding the personal data concerned, we will notify you no later than 72h after we notice the data breach or have been informed about this by our subprocessors.



Your rights

You have the right:

- 1. to access and right to be informed
- 2. to rectification and right to erasure
- 3. to restriction of processing personal data and right to object
- 4. to data transfer
- 5. not to be subject to a decision based solely on automated processing

These rights can be exercised by contacting our Data Protection Officer, via email or phone number stated below.

If this does not lead to a satisfactory outcome, then there is always the right to file a complaint with the Personal Data Protection Agency, the supervisory authority in the area of privacy or any other supervisory authority in his/her habitual residence, place of work or place of the alleged infringement of the data subjects rights. If you have questions about how we handle personal data, please let us know and feel free to reach directly to our Data Protection Officer via email: contact@webcapital.hu or via phone: +36 70 636 5488.

Changes and amendments

We reserve the right to modify this Policy relating to the Website or Services at any time, effective upon posting of an updated version of this Policy on the Website. When we do we will revise the updated date at the bottom of this page. Continued use of the Website after any such changes shall constitute your consent to such changes.

Acceptance of this policy

You acknowledge that you have read this Policy and agree to all its terms and conditions. By using the Website or its Services you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to use or access the Website and its Services.



Contacting us

If you have any questions about this Policy, please contact us.