

Commitment of Pixel Apps Kft. Regarding Personal Data Processing

Pixel Apps Kft. shall take care that the processing of personal data obtained by its services shall be in compliance with the Hungarian legal regulations in force at all times. Upon setting the principles, rules and proceedings of data protection, the provisions of Act CXII of 2011 on the information self-determination right and information freedom were taken into consideration in particular.

Pixel Apps Kft. shall respect the confidential information of its business partners and customers and it shall handle all data and facts obtained as confidential and such data and facts shall be used exclusively for developing its services and preparing statistics. Data shall only be used for other purposes with the express consent of the data subject.

Pixel Apps Kft. shall only store data if the data subject consents that or if obliged by law. The personal data provided shall not be forwarded or disclosed to any third person without the express consent of the data subject. Pixel Apps Kft. shall take care of the protection of data by all means.

Pixel Apps Kft. is committed to protect the data files managed and it shall ensure at the available technical level at all times that those shall not be interconnected with and assigned to the data subject except for legal exceptions.

Pixel Apps Kft. considers the high-level technical protection of its IT systems and the locations serving for the preservation of data highly important priority. The servers used for storing data are managed by the company found at its registered seat and other premises.

Rights of Persons Involved in Personal Data Processing and their Opportunities to Enforce such Rights

Data subjects may ask the data processor to

1. provide information about the management of their personal data,
2. to correct their personal data,
- 3, to cancel or close their personal data except for compulsory data management

In the event that Pixel Apps Kft. takes part in the management of personal data as a data processor, then it shall forward the request of the data subject with to the data controller (Customer) with right of disposal.

1. a. Upon the request of the data subject the data controller shall provide information about the data controlled by itself or processed by the data processor assigned by itself, the source thereof, the purpose of data management, the legal title and duration thereof, the name and address of the data controller and its activity related to data management as well as the circumstances and impact of the data protection incident and the measures taken to eliminate it, furthermore in case of forwarding the personal data of the data subject about the legal title and recipient of the data forwarded.

1. b. The data controller shall provide information within the shortest time but no later than 25 days of the submission of the request in an easily understandable form.

The information shall be free of charge if the person requesting the information had not submitted a request related to the same circle of data in the same year to the data controller. Otherwise a compensation for costs may be charged.

1. c. The provision of information to the data subject may only be refused by the data controller in the cases set forth in the Info Act. In case of refusing to provide information, the data controller shall inform the data subject in writing on the basis of which provision of the Info Act the information shall not be provided. In case of refusing to provide information, the data controller shall be obliged to inform the data subject about the opportunities of legal remedy in front of the court of justice and addressing the Hungarian National Authority for Data Protection and Freedom of Information. The data controller shall inform the Authority about the refused requests annually before the 31st January of the year following the reference year.

2. a. The personal data shall be corrected by the data controller if it is untrue and the true data is available.

3. a. The data controller shall close the personal data if the data subject requests that or if it is assumed on the basis of available information that cancellation would injure the legitimate interest of the data subject. Closed personal data shall be processed exclusively until the purpose of data processing excluding the cancellation of the personal data exists.

3. b. The data controller shall indicate the personal data processed if the data subject disputes the correctness or accuracy thereof but the incorrectness or inaccuracy of the disputed personal data cannot be clearly concluded.

3. c. The data controller shall have 25 days to cancel, close or correct personal data. In the event that the data controller fails to fulfil the request of correction, closure or cancellation of the data subject, it shall notify the reasons for refusal in writing within 25 days.

3. d. The data controller shall notify the data subject and anyone to whom the data had been previously forwarded for the purpose of data processing about the correction, closure and cancellation of the data. Such notification shall be omitted if this does not injure the legitimate interest of the data subject taking the purpose of data processing into consideration.

3. e. If the data controller does not fulfil the request of the data subject for correction, closure or cancellation, it shall inform the data subject about the factual and legal reasons of refusing the request for correction, closure or cancellation within 25 days of receiving such request in writing or electronically with the consent of the data subject. In case of refusing the request for correction, closure or cancellation, the data controller shall inform the data subject about the opportunities of legal remedy in front of the court of justice and addressing the Hungarian National Authority for Data Protection and Freedom of Information.

3. f. The rights of the data subject set forth in the present Section may be restricted by law for the internal and external security of the state owned, such as national defence national security, crime prevention or law enforcement or execution of sentences; furthermore for governmental, municipal, economic or financial interest, for the major economic or financial interest of the European Union and in order to prevent and explore disciplinary and ethical offences related to exercising professions and breach of labour law and work safety duties including supervision and monitoring in each case furthermore in order to protect the rights of the data subject and others.

4. The data subject may object to the processing of their personal data

a) if processing or forwarding personal data is required exclusively to fulfil the legal obligation of the data controller or to enforce any legitimate interest of the data controller, the data recipient or any third person except if such data processing is required by law;

b) if personal data is used or forwarded for direct marketing, public opinion poll or scientific research purposes;

c) in the cases specified by law.

5. The data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request and make a decision whether the request is founded or not and inform the requesting party about the decision in writing.

6. If the data controller finds the objection of the data subject founded, it shall terminate the data processing including any additional data recording and forwarding and shall close the data and inform everybody about the objection and the measures taken on the basis thereof to whom the personal data involved in the objection had been previously forwarded and who shall take measures to enforce the right to objection.

7. In the event that the data subject does not agree with the decision made by the data controller, they may appeal against it at the court of justice within 30 days of the reception thereof.

8. The data of the data subject shall not be cancelled if the data processing was ordered by law. The data however shall not be forwarded to the recipient of data if the data controller agreed with the objection or the court of justice concluded that the objection was legitimate.

9. In case of violating the rights of the data subject, they may turn to the court of justice against the data controller. The case shall be anticipated by the court.

10. Pixel Apps Kft. as a data controller shall compensate for damages caused to third persons by tortious processing of the data of the data subject or by violating the requirements of data security except:

a) if the damage was caused by an unavoidable cause beyond the circle of data processing,

b) if it was caused by the deliberate or grossly negligent conduct of the injured party.

11. The data controller shall prove that the data processing is in compliance with the provisions of the relevant legal regulations.

12. The judgement in the lawsuit shall be the competence of the tribunal. The lawsuit may also be filed at the tribunal having jurisdiction at the permanent home or temporary residence of the data subject according to the choice of the data subject.

Persons otherwise not having legal capacity in lawsuits may be parties to the lawsuit.

The Authority may intervene in the lawsuit in order that the data subject wins the lawsuit.

13. If the court of justice accepts the request, it shall oblige the data controller to correct, close or cancel the data, to terminate the decision made by automated data processing, to take the right of

objection of the data subject into consideration or to provide the data requested by the data recipient set forth in Article 21 of the Info Act.

14. If the court of justice refuses the request of the data recipient in cases set forth in Article 21 of the Info Act, the data controller shall cancel the personal data of the data subject within 3 days of announcing the decision.

The data controller shall also cancel the data if the data recipient does not address the court of justice within the term set forth in paragraphs (5) and (6), Article 21 of the Info Act.

15. The court of justice may order the publication of the decision by disclosing the identification data of the data controller if the interests of data protection and the rights of higher number of data subjects protected by the Info Act require to.

II. Further facilitation of the rights of persons involved in personal data processing and their opportunities to enforce such rights in cases of data processing by Pixel Apps Kft.

Please do not hesitate to contact us with your remarks and complaints.

6000 Kecskemét, Vértés utca 16/B

2. You may address the Hungarian National Authority for Data Protection and Freedom of Information directly with your opportunities for legal remedy or your complaints.

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