

INFINITYN INTERNATIONAL KFT.

**PRIVACY POLICY
FOR CONTACT PERSONS OF POTENTIAL
BUSINESS PARTNERS**

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II. Main part

II.1. Aim of Policy

- (1) In this document, we would like to inform individuals contacted by the Controller via e-mail or telephone with business relationship opportunities (hereinafter: the Data Subjects) about the details of the processing of their personal data, by fulfilling our obligations under 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 (hereinafter: GDPR).
- (2) For the purposes of this privacy policy, personal data is identified as its GDPR definition. Therefore, personal data is any information relating to an identified or identifiable natural person; 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.
- (3) The definition of personal data therefore includes - both in accordance with the GDPR and this privacy policy - identification data as well as contact data.

II.2. Data of Controller

Name: Infinityn International Korlátolt Felelősségű Társaság
Registered seat: 1117 Budapest, Alíz utca 1. A. ép.
Representer: Bukits Róbert Miklós managing director
Court registry Cg. 01-09-283249
number:
Tax identification 25577813-2-43
number:
Registered by: Company Registry Court of Budapest-Capital Regional Court
Telephone number: + 36 1 408 8315
E-mail address: dataprotection@infinityn.com

II.3. Data processing activities

(1) Data processing for direct marketing purposes, based on legitimate interest

Activity description: In order to establish new business relationships, the Controller seeks private individuals who can be connected to potential business partners, filtered by internal procedures and methodology, via electronic message and / or telephone in order to generate business interest.

Range of Data Subjects:	A natural person (eg contact person, representative, employee) who can be connected to a potential customer, whom the Controller seeks with business opportunities.
Aim of data processing:	Sale of the Controller's service

The legal basis of data processing:	the legitimate interest of the Controller and the organisation represented by the Data Subject who may be linked to the Data Subject [Article 6 (1) f) of GDPR]
Description of legitimate interest:	The Controller's legitimate interest is to establish new business relationships and entrustments. The presumed legitimate interest of the Data Subject's employer is to use the services of the Controller. The Controller substantiates the legitimate interest of the employer of the Data Subject with market research. The Controller filters the companies that can be contacted by strict internal procedures and methodologies (who are the ones for whom the Controller's service may be relevant?) and which target person to contact with business opportunities within the organizational system of the potential business partner. The data controller does not send mass of requests.
Range of processed data:	Name, position, work experience, work email address, business telephone number, employer's name, other information.
Duration of storage of personal data:	6 months after 5 years of the first request is sent out or until the Data Subject's objection.
Source of personal data:	Databases and publicly available sources lawfully used by the Controller (ZoomInfo, the employer's website, public information available on LinkedIn, other information available on the Internet).
Who do we share personal information with?	With the following persons having an employment relationship with the Controller: sales developer, sales developer manager, sales leadership team, members of the account based intelligence team, managing director of Controller.
Used Processors:	HubSpot Ireland Limited

(2) Data processing for direct marketing purposes, based on the consent of the Data Subject

Activity description: If the addressee of business inquiries shows an interest in the services of the Controller and mutual communication between the parties is initiated, the Controller shall consider it as his or her consent to the processing of the Data Subject's personal data. If the Data Subject provides additional personal data about himself / herself during the communication, the Data Subject consents to the processing of his / her personal data by providing personal data. From now on, the Data Controller's personal data will be processed by the Controller with the consent of the Data Subject.

Range of Data Subjects:	A natural person (eg. contact person, representative, employee) who can be connected to a potential customer, whom the Controller seeks with business opportunities.
Aim of data processing:	Sale of the Controller's service.

The legal basis of data processing:	Consent of the Data subject [Article 6 (1) a) of GDPR].
Range of processed data:	Name, position, work experience, work email address, work telephone number, employer's name, other information given by Data Subject.
Duration of storage of personal data:	6 months after 5 years of the first request is sent out or until the withdrawal of consent.
Source of personal data:	Databases and publicly available sources lawfully used by the Controller (ZoomInfo, the employer's website, public information available on LinkedIn, other information available on the Internet) as well as the Data Subject.
Who do we share personal information with?	With the following persons having an employment relationship with the Controller: sales developer, sales developer manager, sales leadership team, members of the account based intelligence team, managing director of Controller.
Used Processors:	HubSpot Ireland Limited

(3) Register of measures related to the exercise of data management rights

Activity description: In order to fulfill the legal obligations of the Controller, the Controller leads a register of the exercise of the rights of the Data Subject under the data protection rules and the measures taken on the basis thereof. The rights of the Data Subject are set out in Section II.6. of this privacy policy.

Range of Data Subjects:	A natural person (eg. contact person, representative, employee) who can be connected to a potential customer, whom the Data Controller seeks with business opportunities.
Aim of data processing:	Fulfilling GDPR obligations and ensuring accountability
The legal basis of data processing:	Fulfillment of the legal obligation of the Controller [Article 6 (1) c); Article 5 (2) and Article 12 of GDPR]
Range of processed data:	Name, contact details, subject of the submission, personal data provided in the submission, date and manner of taking measures, content of the measures, content of the request and date of reply.
Duration of storage of personal data:	6 months after 5 years of receiving the submission
Consequences of not providing the data:	It is not possible to identify the person interested, so he/she cannot receive an answer.

Source of personal data:	It is partly provided by the Data Subject and partly available by the Controller.
Who do we share personal information with?	With the persons having an employment relationship with the Controller: sales developer, sales developer manager, sales leadership team, members of the account based intelligence team, managing director of Controller.
Used Processors:	HubSpot Ireland Limited

II.4. Providing information related to data management

- (1) General information providing in connection to the processings of personal data on the basis of the Controller's legitimate interest:

In connection with data processing based on the legitimate interest of the Controller, the Controller has performed the interest balancing test. The protection of personal data and the respect for privacy are ensured by the fact that the only personal data that are processed on the basis of legitimate interest are the Data Subject's business or workplace personal data. The personal data processed in this way can also be accessed within the organizational system of the Controller, only by persons working in certain positions.

- (2) **Recipients of personal data:**

- (a) the persons having an employment relationship with the Controller: sales developer, sales developer manager, sales leadership team, members of the account based intelligence team, managing director of Controller
- (b) the attorney providing legal representation.

- (3) **Processors used by Controller:** Annex no. I. of the privacy policy contains the used Processors.

- (4) **Method of data processing:** On a paper basis, locked with a key or with other methods in a locker or/and electronically.

- (5) **General description of technical and organizational measures:** data protection education, application of anti-virus, provision of physical protection, establishment of authorization levels, provision of encrypted wifi (VPN) connection, storage of data and documents via secure cloud storage, transmission within the company.

- (6) **Data security measures**

Controller ensures the security of the Data Subjects' personal data with the following data security measures:

- a) Personal data shall be accessed by a set of personnel specified within our organizational system only to the extent and for the purpose necessary for the performance of their work (see above for circle of recipients).
- b) Conducting data protection training in accordance with the data management regulations.
- c) Educational material is prepared for data privacy training.
- d) Files containing the personal data are stored by Controller in isolation from third parties.

II.5. Automated decision-making (profiling)

We do not use automatic decision-making.

II.6. The Data Subject's rights related to data management

(1) How can you exercise your rights?

You may contact our representative directly with your requests, questions, complaints at the following contact details:

Name: Bukits Róbert Miklós managing director

Telephone: + 36 1 408 8315

E-mail: dataprotection@infinityn.com

You can exercise your rights in connection with data management by submitting a request to us. We shall respond to any contact request immediately, but not later than within 30 days.

You can submit your request regarding your data processing rights in a writing format or electronically addressed to us at the following addresses: 1117 Budapest, Alíz utca 1. A. ép; dataprotection@infinityn.com.

Please contact us electronically, if possible. We inform you that we will respond to the data protection requests in electronic form if possible, unless you specifically request another way of contacting, or your electronic contact information is unknown for us or we deem it necessary to verify the applicant's identity because of data privacy reasons.

We will decide on the application without undue delay, at the latest within one month of receipt, and will inform you of the action taken on the request or, if no action is taken, the reason for this, the possibility to lodge a complaint at the supervisory authority or court.

The period of action may be extended by further two months, if necessary, taking into account the complexity and number of the requests. We will inform you about the extension of the deadline with stating the reasons, within one month of receiving the request.

If your request is clearly unfounded or excessive, we can charge a fee or refuse to take action. If the request for the release of the data imposes a disproportionate additional cost on us (eg. due to the chosen format), we are entitled to charge you the costs related to the release of the data. We will inform you in advance about any incurring costs. During the evaluation of requests, we will make our decision based on the legal basis of the data processing. You are entitled to exercise your data management rights as follows:

	Consent	Performance of contract	Legal obligation	Legitimate interest
request notification	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
request rectification	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
restriction	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
erasure	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
objection				<input checked="" type="checkbox"/>
data portability	<input checked="" type="checkbox"/>			
withdrawal of consent	<input checked="" type="checkbox"/>			
right to lodge a complaint	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

right to legal remedy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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(2) Right to access data

Pursuant to this right, you may request information about the personal data managed by us, as well as about the circumstances related to data processing, in particular, but not exclusively, the purpose of processing your personal data, the duration of data storage, in the case of transmission to other parties, the recipients of the data and, in the case of automated decision-making, its details.

(3) Right to retriification

If we process personal data with inaccurate content by or our own fault or besides that, you may request the rectification of the data processed by us if the Aim of data processing allows supplementing your incomplete data.

(4) Right to erasure

You may request your personal data to be erased by us if any of the following conditions occur:

- a) the processing of your personal data is no longer necessary for reaching the aim of data processing;
- b) if the processing was based on your consent, and you withdraw that consent, if there is no other legal basis for the processing of the personal data;
- c) you object to the processing of your personal data;
- d) your personal data has not been lawfully processed by us;
- e) we are obliged by law to delete your personal data;
- f) Your personal data was collected by us in connection with the information society service before you reached the age of majority.

We are unable to process your request to erase your personal data in the following cases:

- a) processing is necessary for other’s freedom of expression or orientation;
- b) we are obliged by law to process the data;
- c) the processing of the data is necessary for a public health purpose;
- d) the processing is necessary for archival, scientific or historical research or statistical purposes;
- e) processing is necessary for the submission, enforcement or protection of a legal claim.

(5) Right to restriction of data processing

You may request the processing of your data to be restricted by us if:

- a) you dispute the accuracy of the personal data, in which case the restriction shall apply to the period of clarification of the accuracy of the data;
- b) the personal data have not been processed lawfully by us, but instead of erasing them, you request the restriction of the data processing;

- c) we no longer need your personal data for the purpose of data processing, but you expressly request that they should be retained in order to submit, enforce or protect a legal claim;
- d) you object to the processing of your personal data, in which case the restriction shall apply for the period until a decision is made on your claim.

If, based on your request, we restrict the processing of your personal data, we will inform you in advance of the lifting of the restriction. During the period of the restriction, your personal data will not be processed in any way other than their storage, unless one of the following cases applies:

- a) you have consented to the processing of the data
- b) processing is necessary for the submission, enforcement or protection of a legal claim;
- c) the processing is necessary for an important public interest.

(6) Right to object

If we process your personal data on the basis of our own legitimate interest or on someone else's, and if we handle it within the framework of the performance of public duties, you may object to the data processing at any time.

If you object, we will stop processing your personal data, unless one of the following conditions exists:

- a) the processing of the data is justified by compelling legitimate reasons;
- b) the processing of data for archival, scientific or historical research or statistical purposes is necessary in the public interest.

(7) Right to data portability

If your personal data is processed in an automated manner for your consent or for the performance of the contract concluded with you, you may request that the personal data provided by you to be made available to the Data Controller in a structured, widely used, machine-readable format

- a) handed over to you, or
- b) allow it to be transmitted without hindrance to another controller, or
- c) if its technical conditions are given, forward it directly to the Controller that you have designated.

However, we will not process your request if any of the following conditions occur:

- a) processing is necessary for an important public interest:
- b) the request would adversely affect the rights of others.

(8) Right to withdraw consent

If your personal data is processed with your consent, you are entitled to withdraw it at any time. In case of consent revoking, the data processing will be terminated and your personal data will be deleted, provided that there is no other legal basis for the processing of your personal data.

Withdrawal of consent has no consequences for You. However, the withdrawal of your consent does not affect the lawfulness of our data processing prior to your consent.

(9) Right to dispose in case of death

You have the right to authorize a person in a private document of full probative value or authentic instrument- if you have made more than one statement at us, with a statement made at a later date- to validate the following rights you have had within 5 years after your death:

- a) right to access (point (2))
- b) right to rectification (point (3));
- c) right to erasure (point (4));
- d) right to restriction of data processing (point(5));
- e) right to object (point (6)).

(10) Right to lodge a complaint

If you have any questions, objections or complaints related to data management, please contact us with confidence (see point II.2 of this privacy policy).

If you consider that the processing of your personal data does not comply with the applicable legal requirements, you may lodge a complaint with the data protection supervisory authority of any Member State of the European Union.

In Hungary, the data protection supervisory authority is the Hungarian National Authority for Data Protection and Freedom of Information, which contact details are the followings:

Mailing address: 1363 Budapest, Pf.: 9.

Registered office: 1125 Budapest, Falk Miksa utca 9-11.

Telephone: +36 (1) 391-1400, +36 (30) 683-5969, +36 (30) 549-6838

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>

(11) Initiation of court proceedings

You can also enforce your rights in court. The General Court has jurisdiction over the litigation, and the Capital Court has jurisdiction over the lawsuit. The lawsuit can also be initiated before the court of your place of residence or location (the contact details of the courts can be found at the following link: <http://birosag.hu/torvenyszekek>).

Annex No. 1.

Processors used by the Controller

Name	Contact information	Activity	Duration of data processing
HubSpot Ireland Limited	One Dockland Central Guild Street Dublin 1 Ireland	CRM system operator	Until termination of contract