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## Data Processing Policy

This Data Processing Policy includes the data processing rules and practices in relation to the use of „FLAVON AR” application (further referred to as App) developed and operated by the Company. This policy is intended to provide the users of the App with information.

By using the App, users automatically accept our Data Processing Policy.

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## 1. Contact Details of Service Provider:

Company name: **Flavon Group Kft.** (further referred to as Company or FLAVON)

Registered at the Companies Court of the General Court of Debrecen under Company Registry Number: **09 09 011706**

Head office: **4033 Debrecen, Veres Péter utca 19.**

Tax number: **13526456-2-09**

Represented by: Gaál László ügyvezető

Email address: [info@flavongroup.com](mailto:info@flavongroup.com)

**DSA - Member of Direct Selling Association – Visit [www.dsa.hu](http://www.dsa.hu) for DSA's Code of Ethics**

## 2. Source of Data

Data processed by Flavon is collected directly from the users of the App through the web hosting service providers storing the traffic data for the App.

### Data collected directly from the user/visitor:

- (i) No direct data provision is requested at the time of the download of the App, no cookies get installed or used.
- (ii) If the User creates his/her own profile by completing the registration, the provision of email address, nickname and password is required (the provided personal data will be processed by clicking on the REGISTRATION button).
- (iii) No information is obtained from any cookie when you visit the App.

The registration is solely required for the creation of the ranking list when using the game, to boost engagement and participation in the Contest.

Flavon processes the personal data indicated above solely for the purpose determined in the present data protection policy.

## 3. Data Processing

Any data which can be related to a natural person directly or indirectly is classified as personal data.

The Company will do everything in order to minimize the volume of data processing and will abide by data processing principles.

1./ No data processing takes place by downloading the App. During registration the following data processing activity takes place:

Data Category	Purpose of Data Processing	Lawful Basis for Data Protection	Length of Storage	Data Transfer
Email address	Communication, identification		Until withdrawal of	Storage service provider and employees

<b>Password</b>	Secure data processing	Consent of Data Subject, Article 6 (a) of the GDPR, § 13/A (3) of Act CVIII of 2001.	consent (deletion of registration)	performing administrative tasks for the Company
<b>Nickname</b>	Addressing, identification			

The sole purpose of registration is to establish a ranking.

## 2./ Delivery and collection of prizes

Players who participated in and won the Contest are requested via email to provide the data specified below. These data are required for the delivery of the prize.

<b>Data Category</b>	<b>Purpose of Data Collection</b>	<b>Lawful Basis for Data Protection</b>	<b>Length of Storage</b>	<b>Data Transfer</b>
<b>Delivery Address</b>	delivery of the prize	Consent of Data Subject, Article 6 (a) of the GDPR, § 13/A (3) of Act CVIII of 2001.	Until withdrawal of consent, which will hinder the delivery and collection of the prize	Storage service provider and employees performing administrative tasks for the Company and the courier service delivering the prize
<b>Full name</b>	identification, delivery of the prize			
<b>Phone number</b>	delivery of the prize, required data for courier services			
<b>Club Member ID number</b>	if applicable, makes identification easier		Until Membership expires	

## 4. Recipients of Personal Data and Categories of Recipients

- Employees of the Company performing administrative tasks in general or in relation to the App specifically,
- Storage Service Provider: Appentum Kft. (Registered at: 9023 Győr, Körkemence utca 8., company registration number. 08-09-027613, tax number: 23572843-2-08) email: [info@appentum.hu](mailto:info@appentum.hu), phone: +3620-520-9005
- The corporate lawyer of the Company also has access to all data recorded at the Company with the purpose of resolving any arising legal matters where his/her contribution is required.
- Authorities may also have access to personal data if required, adhering to the relevant legal requirements.

Our Company takes all necessary data protection measures in order to make sure that the employees involved in data processing keep all personal data confidential and secure by adopting all the appropriate organizational and technical measures. No data will be transferred outside the EU.

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## 5. Duration of Data Processing Activities

The duration of data processing activities is indicated in Point 3. The indicated duration of data processing may be subject to change if necessary, for example for the purpose of legal proceedings. Personal data will be erased irrevocably after the indicated period of time.

## 6. Rights of Data Subjects

### a.) The right to be informed

Company Regulations as well as the Data Processing Policy is accessible in the App at all times. The Company reserves the right to modify/update the applied company regulations, including but not limited to the changes to certain measures or internal procedures. The Version Number on the top of page 1 of the Policy includes the effective date. After the publication date of the updated Policy, the users of the App automatically accept the updated Policy.

If the changes affect the rights or freedom of the users in any way, or their consent to such changes becomes obligatory, the Company will display the relevant changes in the App in a clearly visible way (pop-up window), or will inform the Data Subject via email. Such changes will come into effect on the 7th day after the pop-up is posted or the email is sent out.

When using the App, the Data Subject must ensure that he or she is aware of the content of the Data Processing Policy currently in force.

Within the data processing period, the Data Subject shall have the right **to ask for information** from the Company on the processing of his/her data, on the method, blocking, erasure of processing, and any action related to the data processed. The Company, as the controller, shall inform the Data Subject in writing, without undue delay, or not later than 15 days after the submission of the request, on the data processed, on the purpose, lawful basis, duration and – if the data have been transferred to any third party – should provide information concerning the recipients to whom and for what purposes his/her personal data are/have been transferred.

### b.) The Right to Confirmation and Access

The Data Subject shall have the right **to obtain confirmation** from Flavon as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing
- the categories of personal data concerned
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- the right to lodge a complaint with a supervisory authority
- where the personal data are not collected from the data subject, any available information as to their source.

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If the Data Subject requires detailed information on the data processing carried out by Flavon, the Company will respond within 15 days from the receipt of the request and will provide access to all the required information.

c) Right to Rectification

The Data Subject shall have the right to initiate the rectification of inaccurate personal data concerning him or her by sending a request to the Company, to which Flavon is obliged to respond within 30 days.

d) Right to Erasure of Data

The Data Subject shall have the right to request in person or via email **the erasure of his/her personal data without undue delay and without reason** if:

- the duration of the data processing ended
- the data subject withdraws consent on which the processing is based on and where there is no other legal ground for the processing
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing
- the personal data have been unlawfully processed
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject
- the personal data have been collected in relation to the offer of information society services.

except in the cases provided for in Article 17(3) of the GDPR Regulation.

The Company will not erase data that it is legally obliged to store or when it has legal grounds to record them; thus such data cannot be erased. In the event of refusal to delete data, the Company provides the reasons for the refusal by indicating the relevant legal grounds.

e) Right to Restriction of Processing

The Data Subject shall have the right to obtain restriction of processing from Flavon where one of the following applies:

- the accuracy of the personal data is contested by the Data Subject, for a period enabling the Company to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the Data Subject has objected to processing; in this case the period of restriction covers the time while it is verified whether the legitimate grounds of the controller override those of the data subject.

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Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A Data Subject who has obtained restriction of processing shall be informed by the Company before the restriction of processing is lifted.

f) Right to Data Portability

The Data Subject shall have the right to receive the personal data concerning him or her in a commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company, in case of the data processing is based on the Data Subject's consent or on a contract and the processing is carried out by automated means. The Data Subject shall have the right to have the Company transmitting his/her personal data directly to another data controller. This right of the Data Subject shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and this right shall not affect the rights and freedoms of others.

The Company shall not be held liable for data processing carried out by Third Parties. Related requests shall be reacted upon within 30 days from the receipt of the request.

g) Right to Object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her if processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party (including profiling).

Except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data.

Flavon shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data or for the establishment, exercise or defence of legal claims.

**The Company informs the Data Subject that no profiling or automated individual decision making is carried out with the data processed.**

h.) Complaint against Data Processing

The Member shall have the right to submit a complaint against data processing to the supervisory authorities or to the court of competent jurisdiction at any time.

The Company's primary intention is to settle any arising disputes peacefully and will make every effort to do so.

i.) Withdrawal of Consent

The Data Subject shall have the right to withdraw his or her consent to the processing without this withdrawal affecting the lawfulness of the previous processing or the processing based on any other legal basis.

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## 7. The Company's Obligations and Security Measures

By providing this policy and making it available, the Company wants to ensure the fulfilment of the obligations under GDPR regulations and Info law, and the provision of information.

The purpose of this Policy is to provide Data Subjects with adequate information on the data processed by the Company and on the data transmitted to the controller, the name and address of the controller, the purpose, legal basis and duration of the processing, and the legal basis for the transfer of data.

The Company has implemented organizational and security measures to ensure the security of the data processed and to guarantee the rights of the Data Subjects. The main actions taken by the Company are as follows:

- Concluding agreements with Controllers and other participants of the data processing, in which they are legally bound to treat personal data confidentially and to guarantee the protection of personal data to the extent and in the manner required by the legislation in force
- Enrolment of employees and staff in trainings with the purpose of raising awareness of the significance of personal data protection. Ensuring that these employees and staff have limited access to personal data in accordance with their job and their competence.
- Establishing a system of internal procedures for the protection of personal data
- Displaying Company contact details to make users aware where to turn with requests/claims/complaints concerning the processing of personal data
- Installation of IT applications that restrict access to the App in a way that only users with a user account can have access to the App. The only requirement to have a user account is the installation of the Application.

As soon as the Company becomes aware that a personal data breach has occurred regarding any aspects of the personal data it processes, the company shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the competent supervisory authority, unless the Company is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

Where such notification to the supervisory authority cannot be made within 72 hours, the reasons for the delay should accompany the notification and information may be provided in phases without undue further delay.

Flavon **communicates to the data subject a personal data breach, without undue delay**, where that personal data breach is likely to result in a high risk to the rights and freedoms of the natural person in order to allow him or her to take the necessary precautions unless:

- the controller has implemented appropriate technical and organizational measures, and these measures have been implemented for the protection of the data affected by the personal data breach, especially measures – for example encryption – which render the data unintelligible for persons not authorized to access the personal data
- the data controller has implemented further measures following the personal data breach which ensure that the high risk to the rights and freedoms of the Data Subject is no longer likely to happen in the future;
- informing the Data Subject would involve a disproportionate effort. In such cases, the Data Subjects shall be informed by means of publicly disclosed information, or by a similar measure to ensure that the Data Subjects are informed in an equally effective manner.

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After Flavon becomes aware of a personal data breach, Flavon ascertains whether all appropriate technological protection and organisational measures have been implemented to establish immediately whether a personal data breach has taken place and to inform promptly the supervisory authority and the data subject.

Unfortunately, data transmission over the internet will always carry some risk and 100% security cannot be guaranteed. Despite making every effort, Flavon cannot guarantee or ensure the security of any information received through the App. In view of this, we would like to ask our visitors and users to use the online system on their own responsibility.

## **8. The Company's Responsibility**

The Company takes responsibility for the quality of the data processing it carries out, for the data protection and security measures taken in the event of data breach, and for the security measures taken for the prevention of such incidents, and for compliance with its other legal obligations.

## **9. Complaint Management**

The Data Subject shall have the right to submit his/her objections regarding the data processing activity of the Company at the contact details set out in this data processing policy.

Flavon will attach an ID to the complaint, which will simplify later on the retrieval of the complaint. Flavon will substantially respond to the written complaints it receives, within 15 days. Taking the relevant step according to this agreement means submitting it to the post. If the complaint is refused, Flavon shall inform the Member about the reason of refusal.

In the event of an alleged violation of rights related to the processing of personal data, any data subject may also apply to the competent court, the Curia of Hungary in Budapest, or initiate an investigation at the National Authority for Data Protection and Freedom of Information (President: dr. Attila Péterfalvi, 1024 Budapest, Szilágyi Erzsébet fasor 22/C, ügyfélszolgálat@naih.hu, 036-13911400, www.naih.hu)

## **10. Final Provisions**

This Privacy Policy applies to users and visitors of the App operated by the Company.

This document forms part of the Company's security policy.