

# PRIVACY POLICY



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## Introduction

The purpose of this Privacy Policy (**hereinafter: PP.**) is to enable DokiLab Limited Liability Company (address: 4400 Nyíregyháza, Kalevala sétány 51., tax number: 27063804-2-15, company registration number: 15-09-086670) (**hereinafter: DokiApp**) in accordance with the legal provisions in force, in particular, but not exclusively, the GDPR and the Information Act.

The main goal of the PP. is also to provide the data subjects with concise, transparent, comprehensible, clear and comprehensible information regarding the processing of personal data in an easily accessible form in accordance with the applicable legal regulations.

**This PP. does not cover the management of data provided via the web application operated by DokiApp. The management of this data is included in the Application Privacy Policy available through the application.**

### **1. Interpretative provisions – What means what?**

#### **a.) Types of data managed by the Data Controller:**

**a / 1.) *personal data*:** any information relating to the data subject.

**a/2.) *special data*:** all data belonging to special categories of personal data, ie. personal data referring to racial or ethnic origin, political opinion, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric identifiers for the unique identification of natural persons data, health data and personal data relating to the sexual life or sexual orientation of natural persons.

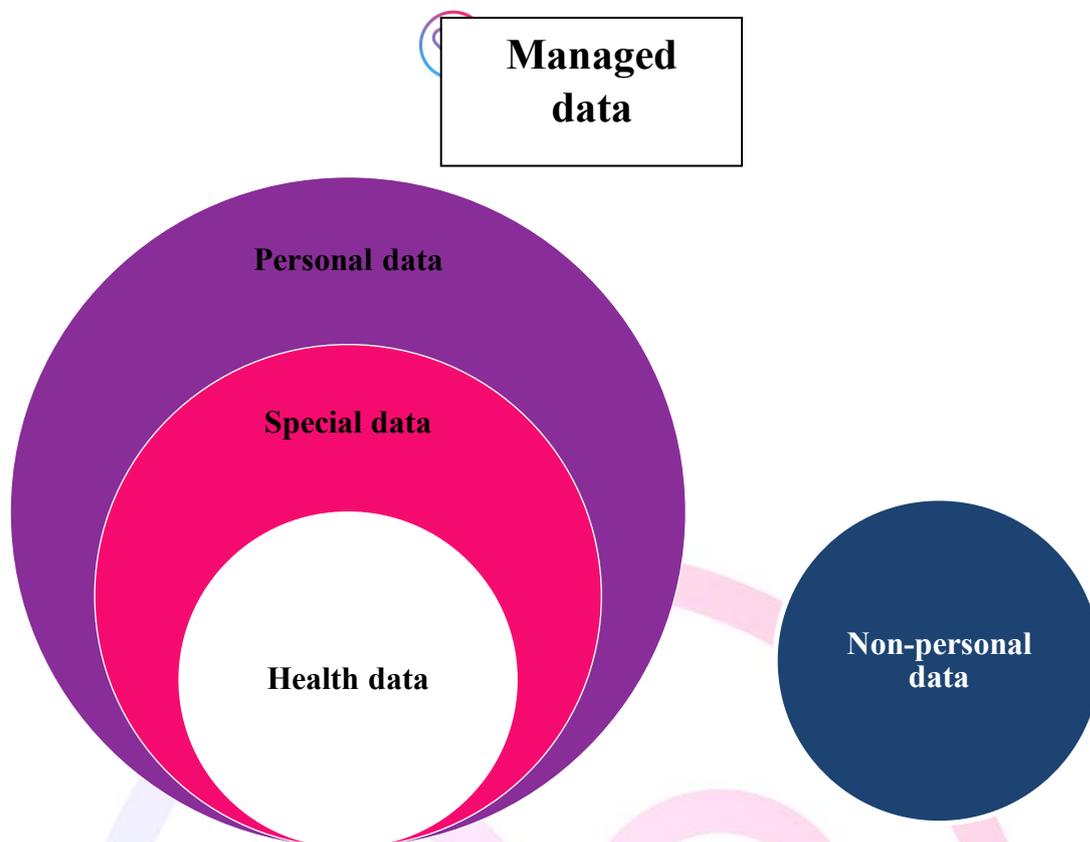
For the purposes of this PP., special data means - in particular, but not exclusively - the health data provided by the User to the Data Controller.

Explanation: In this case, special data is primarily your health data that you provide to DokiApp.

**a/3.) *health data*:** personal data concerning the physical or mental state of health of a natural person, including any data containing information on the state of health of a natural person.

Explanation: Data related to your health, well-being, habits, or treatments that is available to the Data Controller.

**a/4.) *non-personal information*:** any data that does not qualify as personal data.



**b.) Persons involved in the data management of the Data Controller:**

**b/1.) Data Controller:** a natural or legal person or an organization without legal personality who, alone or together with others, determines the purpose of the processing of data, makes and implements decisions on data processing (including the means used) or implements with the data processor.

Explanation: In connection with PP., The Data Controller is primarily DokiApp. In addition, a person who has an employment relationship with DokiApp or other legal relationship for work (e.g. assignment) (hereinafter together: Employee), including the Experts, may also be considered a Data Controller.

**b/2.) User:** a natural person, legal entity, or unincorporated organization that uses the Website or is interested in, requests, or makes an offer in connection with the DokiApp application service, excluding the Experts.

Explanation: If you use the Website or inquire about DokiApp's application services, request a quote, or make a quote to DokiApp, you are a User, unless you qualify as an Expert.

**b/3.) Employee:** a person with an employment relationship or other employment relationship with DokiApp (e.g. a contract of employment).

Explanation: If you work for or on behalf of DokiApp, you qualify as an Employee.

**b/4.) Expert:** A person who contributes to the DokiApp application service by providing advice to the User. An expert is also considered to be a person who is interested in this, asks for an offer or makes an offer to DokiApp, or who applies to become an Expert.

Explanation: If you participate in, apply for, or inquire about, request a quote, or make an offer to DokiApp through the provision of advice to Users, you will be considered an Expert.

**b/5.) Involved in connection with personal data:** a natural person identified or identifiable on the basis of any information. In the course of the interpretation of the PP., a natural person for whom personal data or special data are provided by the User, the Expert or the Employee to the Data Controller shall be deemed to be affected in connection with Personal Data.

The following may be affected by the Personal Data: Users, Experts, Employees and other persons.

Explanation:

You are involved in connection with personal data if:

- You are a User / Expert / Employee and provide DokiApp with contactable information that can identify you, including your health information;
- another User / Expert / Employee passes such data to that DokiApp.

**b/6.) Involved in connection with non-personal data:** the natural person, legal entity or unincorporated entity to which the non-personal data relates or with whom it may be linked. The following may be involved in connection with Non-personal data: Users, Experts, Employees and other persons.

Explanation:

You are involved in connection with non-personal data if:

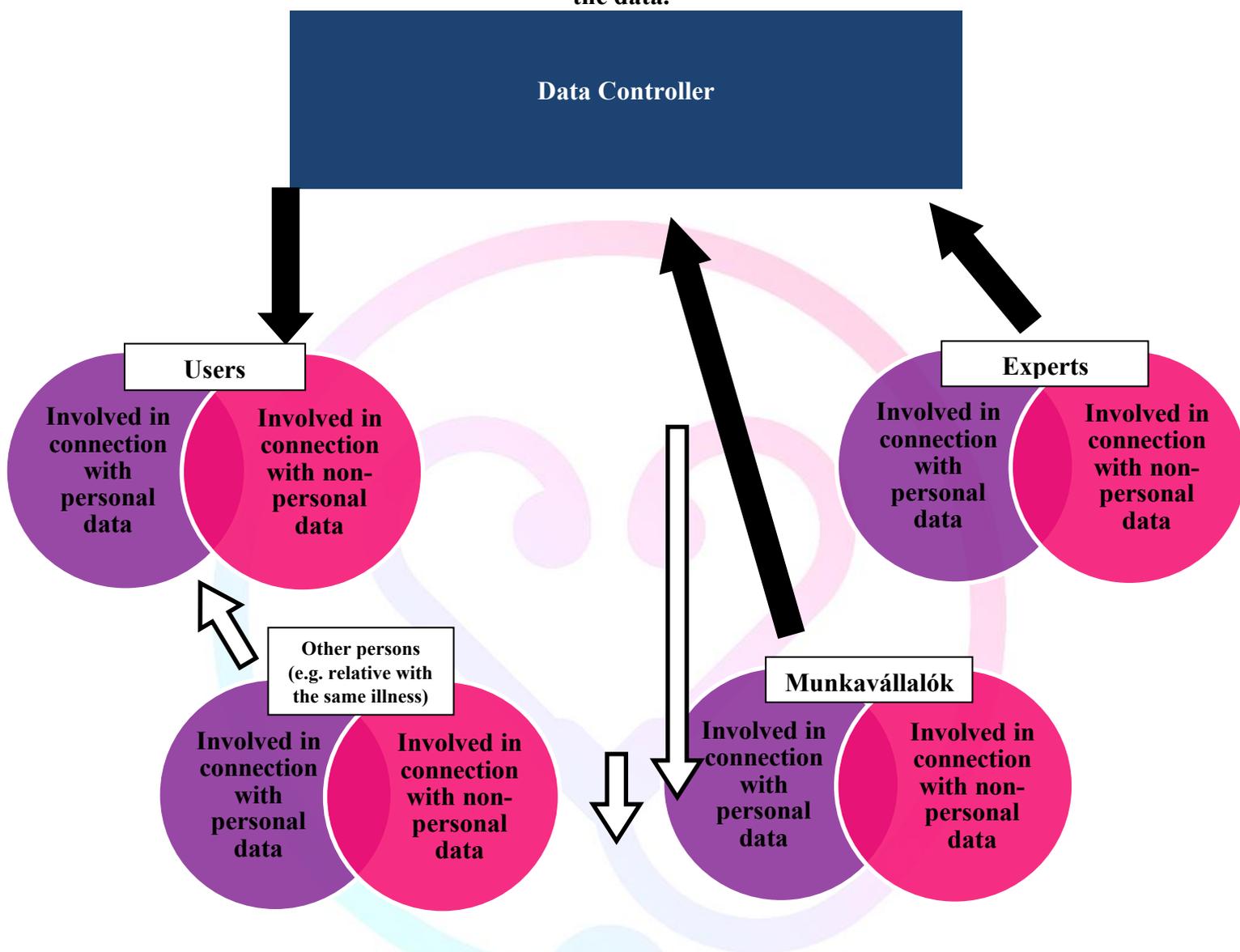
- You are a User / Expert / Employee and you provide DokiApp with information about you that does not identify you and does not constitute health data;
- Another User / Expert / Employee provides such data to DokiApp;

In addition to the above, a legal person or an organization without legal personality may be involved in connection with non-personal data if:

- You
- or another User / Expert / Employee;

pass data about it to DokiApp

Before you continue reading, see which group you belong to! It is important that you can be a member of more than one group at a time. The arrows indicate the movement of the data.



**c.) Activities related to the data management of the Data Controller:**

**c/1.) data processing:** the set of data processing operations carried out by a data processor acting on behalf of or at the direction of the controller.

Explanation: In practice, data processing is when DokiApp entrusts an external company, person, etc. by performing some kind of data management operation with the data it manages. Such can be e.g. systematization and grouping of data, transfer to a unified database, but the performance of accounting tasks based on the data can also be considered as such.

**c/2.) data management:** regardless of the procedure used, any operation or set of operations on the data, in particular the collection, recording, recording, systematisation, storage,

modification, use, interrogation, transmission, disclosure, coordination or linking, blocking, erasure and destruction of the data, and prevent its further use, take photographs, sound or images, and record physical characteristics (e.g. fingerprints or palm prints, DNA samples, irises) that can be used to identify a person.

Explanation: In this case, all activities performed by the Data Controller with the data provided to them are considered data management.

**c/3.) consent:** a voluntary, clear and well-informed statement of the will of the data subject or of the non-person concerned, by means of a statement or other conduct unequivocally expressing their consent to the consent of the person concerned to the personal data or non-personal data treatment.

For the purposes of this PP., the statement of the User, the Expert or the Employee stating that they transfer the personal and non-personal data transferred to the Data Controller to the Data Controller in accordance with the applicable legal regulations and assures the Data Controller that you can legally handle the transferred data without any further action (even if they do not apply to the User, Expert or Employee who provided the data).

Explanation:

A statement constitutes consent:

- in which you consent to the management of your personal and non-personal data provided by you to the Data Controller;
- in which you declare that you have transferred personal and non-personal data provided by you to the Data Controller, but relating to others, lawfully or with your consent in connection with the Personal Data.

In this statement, you also guarantee to the Data Controller that this Data may be processed lawfully by the Data Controller in accordance with the purpose of the data processing or with the consent of the Data Subject, and that no further action is required.

**c/4.) data destruction:** complete physical destruction of the data carrier.

Explanation: Data destruction e.g. destruction of the flash drive or papers containing the data.

**c/5.) data erasure:** making data unrecognizable in such a way that it is no longer possible to recover it.

Explanation: Deleting data e.g. deleting data from the flash drive so that it can no longer be restored.

#### **d.) Other concepts related to the data management of the Data Controller:**

**d/1.) User Agreement:** A two-sided disclaimer between the User and DokiApp regarding application services.

Explanation: The agreement you enter into as a User with DokiApp regarding the use of the application.

**d/2.) expert contract:** the contract you enter into as an Expert with DokiApp for consulting activities in the course of contributing to the provision of application services.

Explanation: The agreement you enter into with DokiApp as an Expert to participate in DokiApp's application services and provide advice to Users through the application.

**d/3.) application service:** the service provided by DokiApp to Users through the application.

Explanation: The service that DokiApp provides to Users through the application.

**d/4.) newsletter database:** a closed data file operated by the Data Controller, containing primarily e-mail addresses, the purpose of which is the long-term storage and systematization of contacts belonging to the recipients and future recipients of newsletters about the Data Controller's services.

**d/5.) social networking sites:** social networking sites are those websites available on the Internet through which Users, Experts, or Employees can follow the content shared by DokiApp or contact DokiApp. Facebook, Instagram, and LinkedIn in particular, but not exclusively, are considered social sites.

**d/6.) website:** a collection of pages, edited in coded form, belonging to a given domain name, which are placed on the hosting site (server page). For the purposes of this PP., we mean the website <https://www.dokiapp.hu/>.

## **2. Data management legislation – Under what legislation does the Data Controller handle the data?**

**2.1.** The Data Controller shall compile this PP., in particular, but not exclusively, in accordance with the legislation specified below:

- *Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46 (hereinafter: GDPR);*
- *The Basic Law of Hungary;*
- *Act V of 2013 on the Civil Code (hereinafter: the Civil Code);*
- *Act CXII of 2011 on the right to information self-determination and freedom of information. Act (hereinafter: Info Act);*
- *Act XLVIII of 2008 on the basic conditions and uniform restrictions of economic advertising activity. Act (hereinafter: Commercial Advertising Act)*
- *Act CVIII of 2001 on certain issues of electronic commerce services and information society services (hereinafter: Electronic Commerce Services Act);*
- *Act I of 2012 on the Labor Code (hereinafter: Labor Code.)*
- *Act CLIV of 1997 on health (hereinafter: Health Act)*

### **3. Purpose of data management – Why does the Data Controller manage data?**

#### **3.1. The purpose of data management for Users:**

- Providing the information requested by the User;
- Defining the application services to be provided to the User;
- Preparation of statistical reports and development of DokiApp's marketing activities through the evaluation of related data;
- Getting to know and investigating user complaints;
- Facilitate the conclusion of user contracts by sending newsletters;
- Fulfillment of legal obligations concerning the data controller.

#### **3.2. The purpose of data management for Experts:**

- Providing the information requested by the Expert;
- Assessing the Expert's abilities and skills;
- identification of the Expert, which is necessary for the conclusion of the expert contract and the performance of the expert contract;
- identification of consulting activities;
- collecting, processing and using the data, information and documents required for the contractual performance of the DokiApp in the context of the contractual performance;
- documentation of contractual performance;
- record the information required for invoicing;
- minimizing the amount of data to be provided repeatedly by the Expert in order to conclude and fulfill further future expert contracts;
- Preparation of statistical reports and development of DokiApp's marketing activities through the evaluation of related data;
- Facilitate the conclusion of new expert contracts by sending newsletters;
- Getting to know and investigating the expert's complaints;
- Fulfillment of legal obligations concerning the data controller.

### **4. Scope of managed data – What data does the Data Controller handle?**

#### **4.1. For Users:**

**4.1.1.** When downloading certain parts of the websites, cookies are placed on the User's computer. Cookies are small text files that the computer and the browser have saved about the User's activity on the website and allow the User's computer to be identified (hereinafter: activity data). Users receive a separate notification about the use of cookies when using the website, based on which they have the opportunity to consent to the use of cookies. The placement of cookies is also necessary for the functioning of certain functions of the website. The placement of cookies does not harm your computer and does not contain a virus. The activity data is stored in a closed system protected by an IT algorithm, to which only the Data Controller - or other persons indicated in point 8.1 - have access rights. The Data

Controller expressly undertakes to use the activity data exclusively for the development of the website, the development of the marketing strategy and the preparation of statistical statements.

Explanation: The Data Controller wants to develop its services in such a way that they can be used in the easiest and most convenient way. That is why the website uses so-called cookies during its operation. Cookies are small text files that the site places on your computer with your consent (but do not cause any problems or damage). The website can then monitor what you are viewing on the website through your computer.

It is important that this data is only used by the Data Controller to compile statistics and improve the website and its marketing activities.

#### 4.1.2. Data managed in the newsletter database:

Users can subscribe to the DokiApp newsletter list while using the website. In doing so, you must provide the following information:

- e-mail address.

#### 4.1.3. The User may inquire about the DokiApp application services in person, by telephone, e-mail or through social networking sites.

##### a.) Personal and telephone inquiry:

If the answer can be given by the Data Controller during the inquiry, then no data will be recorded in the Data Controller's system, no data management will take place.

If the Data Controller is unable to provide the requested information during the inquiry and the User wishes to return the information in person, they must provide the following information:

- Name;
- Other data related to the interest (e.g. question related to the application)

If the Data Controller is unable to provide the requested information during the inquiry and the User requests a telephone recall or e-mail response, they must provide the following information:

- Name;
- Phone number and/or e-mail address;
- Other data related to the interest (e.g. question related to the application)

##### b.) E-mail inquiry:

If the User wishes to enter the Data Controller in person for the information, they must provide the following data:

- Name;
- Other data related to the interest (e.g. question related to the application)

If the User requests a telephone call back in connection with the interest, they must provide the following information:

- Name;
- Phone number;
- Other data related to the interest (e.g. question related to the application)

If the User requests an e-mail response in connection with the interest, they must provide the following information:

- Name;
- Other data related to the interest (e.g. question related to the application)

In addition to the above, in such a case the Data Controller also manages the User's e-mail address.

c.) Inquiry through social media:

If the User wishes to enter in person for the answer, they must provide the following information:

- Name;
- Other data related to the interest (e.g. question related to the application)

If the User requests a telephone call back in connection with the interest, they must provide the following information:

- Name;
- Phone number;
- Other data related to the interest (e.g.: question related to the application)

If the User requests an e-mail response in connection with the interest, they must provide the following information:

- Name;
- E-mail address;
- Other data related to the interest (e.g. question related to the application)

If the User requests a response sent via social networking sites in connection with the interest, they must provide the following information:

- Name;
- Other data related to the interest (e.g. question related to the application)

In addition to the above, in such a case the name of the User's profile will also be subject to data management.

**4.1.4.** The User may report their complaints to DokiApp by e-mail or post. In doing so, you must provide the following information:

- Name;
- Date the problem was detected;
- Other information needed to investigate the problem.

## **4.2. For Experts:**

**4.2.1.** The Expert can inquire about DokiApp's application services in person, by phone, e-mail, on the website or on social networking sites.

a.) Personal and telephone interest:

If the answer can be given by the Data Controller during the inquiry, then no data will be recorded in the Data Controller's system, no data management will take place.

If the Data Controller is unable to provide the requested information during the inquiry and the Expert wishes to return the information in person, they must provide the following information:

- Name;
- Other data related to the interest (eg: question related to the application)

If the Data Controller is unable to provide the requested information during the inquiry and the Expert requires a telephone recall or e-mail response, they must provide the following information:

- Name;
- Phone number and/or e-mail address;
- Other data related to the interest (eg: question related to the application)

b.) Email interest:

If the Expert wishes to enter the Data Controller in person for the information, they must provide the following information:

- Name;
- Other data related to the interest (eg: question related to the application)

If the Expert requests a telephone call back in connection with your interest, you must provide the following information:

- Name;
- Phone number
- Other data related to the interest (eg: question related to the application)

If the Expert requires an email response to your interest, you must provide the following information:

- Name;
- Other data related to the interest (eg: question related to the application)

In addition to the above, in such a case the Data Controller also handles the e-mail address of the Expert.

c.) Inquiry through the website:

When inquiring through the Website, the Expert must provide the following information:

- Name;
- E-mail address;
- Phone number

d.) Interest through social media:

If the Expert wishes to go in person for the answer, you must provide the following information:

- Name;
- Other data related to the interest (eg: question related to the application)

If the Expert requests a telephone call back in connection with your interest, you must provide the following information:

- Name;
- Phone number

- Other data related to the interest (eg: question related to the application)

If the Expert requires an email response to your interest, you must provide the following information:

- Name;
- E-mail address
- Other data related to the interest (eg: question related to the application)

If the Expert requires a response from the social media in connection with your interest, you must provide the following information:

- Name;
- Other data related to the interest (eg: question related to the application)

In addition to the above, in such a case, the name of the Expert's profile will also be subject to data management.

**4.2.2.** The Expert can report complaints to DokiApp by email or post. In doing so, you must provide the following information:

- Name;
- Date the problem was detected;
- Other information needed to investigate the problem.

### **4.3. For Employees:**

**4.3.1.** The Data Controller manages the following data regarding the Employees and the employment relationship:

- Name;
- Birth name;
- Time and place of birth;
- Mother's name;
- Address;
- Tax number;
- Social security number;
- Bank account number;
- data on salaries, contributions and taxes;
- other information in any official information.

## **5. Legal basis for data management – On what legal basis does the Data Controller manage data?**

### **5.1. For personal data:**

The data management authority of the Data Controller is based on the consent of the Data Controller involved in connection with the Personal Data. You can withdraw your consent at any time with regard to the data subject.

The legal basis for the processing of certain personal data is also that the processing is necessary for the performance of a contract in which one of the parties is involved in the Personal Data or for taking steps at their request prior to the conclusion of the contract.

In addition to the above, the processing of certain personal data (e.g. data required for bookkeeping) is also required by law.

Explanation:

The Data Controller may process personal data concerning you because:

- You, as a data subject, have consented to this. You can withdraw your consent at any time;
- this information is needed to take the steps you have requested to enter into a contract between you;
- this information is required for the performance of a contract between you;
- for the Data Controller, data management is prescribed / permitted by law.

**5.2.** In the case of non-personal data: The data management is based on the statement of the User, the Expert or the Employee, according to which the transferred data can be legally processed by the Data Controller.

Explanation: The Data Controller may process non-personal data because you, the User, the Expert or the Employee have stated that they can handle them lawfully, ie they do not fall, for example: trade secrets, protected knowledge, etc. category.

## **6. The process of data management – How and for how long does the Data Manager handle the data?**

### **6.1. Management of the data provided by the User:**

#### **6.1.1. Management of data stored by cookies:**

The activity data recorded by the cookies are stored in the closed system of the Data Controller, protected by an IT algorithm, to which only the persons specified in point 8.1 have access rights.

The Data Controller manages these data until the purpose of the data management is fulfilled, and the need for the processing is documented every 3 years at the latest. The data prepared in this way is kept by the Data Controller for 10 years.

Explanation: If the cookies on the website have recorded your IP address or your activity on the website, the Data Controller will store the related data in an IT-protected system.

The Data Manager manages the data until it obtains the statistical, development or marketing information that is relevant to it. The need for data management is re-examined by the data controller every 3 years.

#### **6.1.2. Management of data registered in the newsletter database:**

The data of the newsletter database can be found in 6.1.1. shall be stored in a separate closed system as specified in The Data Controller expressly undertakes not to disclose or disclose the data file in the newsletter database to unauthorized third parties. The data related to the User recorded in the newsletter database will be deleted from the Data Controller's newsletter database as soon as possible after the User's individual unsubscription.

Explanation: You can subscribe to DokiApp newsletters while using the website. The data entered here is stored by the Data Controller in an IT-protected system and is not disclosed to others. If you no longer wish to receive newsletters from the Data Controller, you may unsubscribe at any time. In this case, the Data Controller will delete your data as soon as possible.

### 6.1.3. Manage the information provided during the inquiry:

Users may inquire about DokiApp services in person, by telephone, e-mail, or through social networking sites.

If the Data Controller is able to provide the answer immediately during a personal or telephone inquiry, no data processing will take place.

If the Data Controller is unable to provide an answer immediately, or the User is interested in e-mail / social networking sites, then the legal basis for data management is that the data processing is necessary to take the pre-contractual steps requested by the User.

After the completion of the inquiry process, the data controller deletes or destroys the data provided during the inquiry.

After their transfer to the Data Controller, the data provided during the inquiry will be recorded in the Data Controller's closed system protected by an IT algorithm, to which only the persons specified in point 8.1 have access rights.

Explanation: There are four ways to inquire about DokiApp services: in person, by phone, by email, and through social networking sites.

If the Data Controller is unable to respond to you in person or by telephone, you may manage the information you have provided because it is necessary to provide the answer you have requested. The same is true for inquiries via email and social networking sites.

The Data Controller stores the electronically recorded data in a system protected by an IT code.

### 6.1.4. Handling of data provided during the complaint:

You can report a user's complaint to Dokiapp by email or mail.

The data provided during the complaint report is systematically stored in the data system of the Data Controller in a closed system protected by an IT algorithm, and the data recorded on paper is systematically stored in a room that can be properly locked from a security point of view. The persons specified in point 1 shall have the right to access.

The data is managed by the Data Controller until the purpose of the data management is fulfilled, and the necessity of the processing is documented no later than every 3 years. The data prepared in this way is kept by the Data Controller for 10 years.

The Data Controller handles or retains the data, the legal basis of the processing of which is a legal obligation or authorization, for a period specified in the relevant legislation.

Explanation: The electronic data provided during the complaint is stored in a systematic, secure system and / or premises in a closed system protected by the Data Controller Code. The data controller manages the data until the purpose of the data management has been achieved. The Data Controller must review every 3 years whether data management is still necessary.

In the case of data that the Data Controller handles under the law, it handles them for as long as the law requires it.

## 6.2. Management of the data provided by the Expert:

### 6.2.1. Manage the information provided during the inquiry:

Experts may inquire about DokiApp services in person, by telephone, e-mail, or through the Website.

If the Data Controller is able to provide the answer immediately during a personal or telephone inquiry, no data processing will take place.

If the Data Controller is unable to provide the answer immediately or the Expert is interested by e-mail / via the website, then the legal basis for data management is that the processing of the data is necessary to take the pre-contractual steps requested by the Expert.

After the completion of the inquiry process, the data controller deletes or destroys the data provided during the inquiry.

After their transfer to the Data Controller, the data provided during the inquiry will be recorded in the Data Controller's closed system protected by an IT algorithm, to which only the persons specified in point 8.1 have access rights.

Explanation: There are four ways to inquire about DokiApp services: in person, by phone, by email, and through the website.

If the Data Controller is unable to respond to you in person or by telephone, you may manage the information you have provided because it is necessary to provide the answer you have requested. The same is true for inquiries via email and the website.

The Data Controller stores the electronically recorded data in a system protected by an IT code.

Once the inquiry process is complete, the Data Controller will delete your data.

### 6.2.2. Handling of data provided during the complaint:

An expert can report your complaint to Dokiapp by email or mail.

The data provided during the complaint report is systematically stored in the data system of the Data Controller in a closed system protected by an IT algorithm, and the data recorded on paper is systematically stored in a room that can be properly locked from a security point of view. The persons specified in point 1 shall have the right to access.

The data is managed by the Data Controller until the purpose of the data management is fulfilled, and the necessity of the processing is documented no later than every 3 years. The data prepared in this way is kept by the Data Controller for 10 years.

The Data Controller handles or retains the data, the legal basis of the processing of which is a legal obligation or authorization, for a period specified in the relevant legislation.

Explanation: The electronic data provided during the complaint is stored in a systematic, secure system and / or premises in a closed system protected by the Data Controller Code. The data controller manages the data until the purpose of the data management has been achieved. The Data Controller must review every 3 years whether data management is still necessary.

In the case of data that the Data Controller handles under the law, it handles them for as long as the law requires it.

### **6.3. Management of data provided by Employees and related to the employment relationship:**

The primary purpose of the processing of employment-related data is to create and fulfill an employment contract and to fulfill DokiApp's legal obligations related to a given employment relationship.

When establishing the given legal relationship, the Data Controller obtains the data related to the employment relationship from the Employee, and during the existence of the employment relationship, from the Employee, their own organization and the competent authorities.

These data are systematically stored in the data controller's system, protected by an IT algorithm, and the data recorded on a paper basis in a room located in a building that can be properly locked from a security point of view, and only in accordance with 8.1. The persons specified in point 1 shall have the right to access.

The Data Controller handles the data, the legal basis of the processing of which is only with the consent of the Employee, until the purpose of the data processing is fulfilled, and the need for the processing is documented every 3 years at the latest. The data prepared in this way is kept by the Data Controller for 10 years.

The Data Controller handles or retains the data, the legal basis of the processing of which is a legal obligation or authorization, for a period specified in the relevant legislation.

Explanation: The electronic data related to the employment relationship is stored in a closed system protected by the Data Controller Code on a paper basis in a systematic, secure room and / or rooms. If the Data Controller can only process the data because you, as an Employee, have consented to it, you must review every 3 years whether it is still necessary to process the data.

In the case of data that the Data Controller handles under the law, it handles them for as long as the law requires it.

## **7. Data security - How does the Data Controller protect the managed data?**

**7.1.** The data controller shall store the data specified in point 4 (**hereinafter: managed data**) in a closed, IT algorithm-protected system and manage it with data protection-secure, IT algorithm-protected, closed software.

The data available on a paper basis is systematically stored by the Data Controller in a room located in a building that can be properly locked from a security point of view.

The controller undertakes to take all necessary and reasonable steps to prevent the processed data from being tampered with, altered, transmitted, disclosed, deleted or destroyed, both during network communication and in the storage and retention of data, and protects it from accidental destruction and damage, as well as from becoming inaccessible due to changes in the technology used.

Explanation: The data controller stores their electronic data in a system protected by an IT code and uses only software that is also protected by such a code. Paper-based documents are stored in a secure room, locked, by the Data Controller. The data controller protects the data from unauthorized access, alteration, inaccessibility or destruction.

## **8. The scope of data controllers and data processors – Who handles the data passed to DokiApp?**

**8.1.** Data Controller: Only DokiApp and other persons with an employment relationship with DokiApp (**hereinafter together: Data Controller**) are entitled to process and manage the data specified in point 4 and to get acquainted with the stored data, provided that the User's data An expert is also eligible as a data controller. The Data Controller handles the data for a specific purpose, it does not use the data for purposes other than those specified in point 3.

Explanation: Data provided to DokiApp may only be handled by DokiApp managers and employees. In addition, Users' data may be managed by Experts. In the course of data management, they can only act in accordance with the purpose of data management.

**8.2.** Data Processor: DokiApp employs Data Processors to fulfill certain legal and contractual obligations.

**8.2.1.** The data controller stores some of the data under its management in the storage space provided by the following server hosting providers (**hereinafter: Server hosting provider**):

name: Amazon Web Services Inc.

representative: a person authorized to represent on the basis of the data in the register of companies

address: 1200 12th Avenue South Suite 1200 Seattle, WA 98144, United States

name: Firebase - Google LLC

representative: a person authorized to represent on the basis of the data in the register of companies

address: 1600 Amphitheatre Parkway, Mountain View, California 94043, United States

name: Twilio - Twilio Inc.

representative: a person authorized to represent on the basis of the data in the register of companies

address: 375 Beale Street, Suite 300, San Francisco, CA 94105, United States

name: Google Cloud - Google LLC

representative: a person authorized to represent on the basis of the data in the register of companies

address: 1600 Amphitheatre Parkway, Mountain View, California 94043, United States

name: Render - Render Services Inc.

representative: a person authorized to represent on the basis of the data in the register of companies

address: 3611 S Iron St, Chicago, IL 60609-1322 United States

In connection with the data transferred to the data controller, the Server hosting service providers only ensure the storage of the data, they do not perform any other data management operations.

Server hosting providers provide the storage space required to store the data for the time required to fulfill the contract concluded with the Data Controller.

**8.2.2.** The data controller stores and manages each data transferred to them by the following means:

Information provided during the inquiry and newsletter subscription:

- name: Google Analytics  
representative: a person authorized to represent on the basis of the data in the register of companies  
address: address given in the register of companies
- name: MailChimp  
representative: a person authorized to represent on the basis of the data in the register of companies  
address: address given in the register of companies
- name: SendGrid  
representative: a person authorized to represent on the basis of the data in the register of companies  
address: address given in the register of companies
- name: ActiveCampaign  
representative: a person authorized to represent on the basis of the data in the register of companies  
address: address given in the register of companies

Explanation: DokiApp is hosted by the above Server hosting providers. Server hosting providers cannot see the data stored on the server and cannot perform any other data management operations with it. The data will remain in the storage space as long as required by the contract between the Server hosting providers and DokiApp. Please note that the server hosting service is located in a non-EEA country!

The data manager uses the above tools to store and manage some data. The owners and operators of the devices perform only such activities as are necessary for the Data Controller to be able to store and manage the data by the devices. This activity will be continued for as long as necessary due to the fulfillment of the contract concluded with the Data Controller. Please note that the data processing operations performed by the tools take place in a non-EEA country!

Payment details:

- name: SimplePay Plc.  
representative: a person authorized to represent on the basis of the data in the register of companies  
address: address given in the register of companies

#### USER STATEMENT

I acknowledge the following personal data stored in the user account of the data controller DokiLab Korlátolt Felelősségű Társaság (4400 Nyíregyháza, Kalevala sétány 51.) in the user database of <https://dokiapp.hu/> és <https://employeecare.hu/> will be handed over to SimplePay Plc. and is trusted as data processor. The data transferred by the data controller are the following: Email, First name, Last name, Phone number, Billing name, Tax number, Country, ZIP code, City, Address.

The nature and purpose of the data processing activity performed by the data processor in the SimplePay Privacy Policy can be found at the following link:

<https://simplepay.hu/adatkezelesi-tajkoztatok/>

## **9. Rights of Those Affected by Personal Data and Those Affected by Non-Personal Data – What rights do you have in relation to the data management of the Data Controller and the Data Processor?**

**9.1. The Right of Access:** The above persons / organizations may at any time request that the Data Controller provide them with data relating to them and information related to their handling. They may also request access to, extracts from, or copies of, the health documentation relating to them.

Explanation: You can request information at any time about what data the Data Manager manages. You can also request information about the source of the data, the purpose, legal basis, duration of the data processing, the name and address of the data processor and the activities related to the data processing. You can also ask the Data Controller to allow you to view, extract or make a copy of the medical documentation concerning you.

**9.2. Right to rectification:** The above persons / organizations may at any time request that the data controller correct or supplement their data.

Explanation: If data about you is incorrect or incomplete, you can ask the Data Controller to correct or complete it.

**9.3. Right of Restriction, Deletion and Destruction:** The above persons / entities may at any time request a restriction on the processing of their data or the deletion or destruction of such data (excluding data subject to mandatory data processing).

Explanation: You may at any time request a restriction on the processing of your data or the deletion or destruction of your data.

**9.4. The Data Controller is obliged to comply with the above requests as soon as possible after the submission of the request, but no later than within 25 days from the receipt of the request, or to inform the above persons / organizations about the fact and reasons for rejection..**

Explanation: You will receive a response to your request no later than 25 days after your arrival. If the Data Controller rejects the request, it shall state the reasons and inform you of the legal remedies available to you.

**9.5. In the event of a violation of the above rights, the data subjects may turn to:**

- National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/c);
- The court with jurisdiction over the place of residence / stay.

Explanation: If your rights are violated in connection with your personal data, you can contact these bodies.

**9.6. Those involved in connection with Non-Personal Data and the Data Controller shall settle any legal disputes arising between them in connection with data processing primarily by**

agreement. If this does not lead to a result, the person concerned by the Non-Personal Data may go to court in accordance with the general rules set out in the Code of Civil Procedure.

Explanation: If your rights are violated in connection with non-personal data that may be linked to you, you may take legal action or take legal action.

## 10. Data Protection Officer

10.1. The Data Controller shall appoint the following person as Data Protection Officer:

name: Tibor Somogyi

address: 4400 Nyíregyháza, Kalevala sétány 51.

e-mail: [stibor@dokiapp.hu](mailto:stibor@dokiapp.hu)

Explanation: You may contact the above Privacy Officer with privacy issues or questions.

## 11. Miscellaneous and final provisions

11.1. The Data Controller is entitled to unilaterally amend the PP. with prior notice to the Users, Experts and Employees. In the event of a substantial amendment to the PP., the Data Controller must obtain the consent to the lawfulness of the data processing - if necessary - again. Akt is published by the Data Controller through the application.

Explanation: You can view the PP. on the website at any time.

The Data Controller may also amend the PP. independently. In order to prevent the new rules from covering you without your knowledge, the Data Controller will inform you in advance of the change and, if necessary, will ask for your consent to the data processing again.

11.2. The User, the Expert or the Employee may not provide the Data Controller with data that violates the rights or legitimate interests of third parties and / or the Data Controller.

Explanation: You may only transfer data to the Data Controller that does not infringe their rights or the rights of others.

11.3. If the User, the Expert or the Employee has unauthorizedly provided the data of a third party, the Data Controller is entitled to consider the legal declaration of the User, the Expert or the Employee as invalid, to register, subscribe to the newsletter or delete the provided data.

11.4. This PP. consists of 21 numbered pages and has been adopted by DokiApp as a fundamental document of its data management.