

PRIVACY POLICY

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1. Purpose of the Privacy Policy

The goal of our Privacy Policy is to provide all necessary information for natural persons and representatives of legal persons using our services (hereinafter referred to as Data Subjects) in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and assist the Data Subjects in exercising their rights under Section 4. Our services are available on the [website ...](#)

The legal basis of our duty to communicate information is Article 12 of Regulation 2016/679 of the European Parliament and Council (hereinafter referred to as: GDPR), Section 16 of Act CXII of 2011 on the right of informational self-determination and on freedom of information (hereinafter referred to as Information Act) and Section 4 of Act CVIII of 2011 on electronic commerce and on information society services (hereinafter referred to as Electronic Commerce Act).

The Privacy Policy was prepared by taking into account the GDPR, the Information Act and further legal acts relevant from the viewpoint of specific data processing. The list of the legal acts are detailed in Annex 11.1, the main concepts and definitions are determined in Annex 11.2 and the detailed information on the right of the data subject is included in Annex 11.3 of the Privacy Policy.

During the drafting and applying this Privacy Policy, we proceeded in the spirit of the findings of the recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements of prior information and Article 5 of the GDPR, especially the principle of accountability laid down in Article 5, Paragraph 2 thereof.

We also monitor the practice of the European Union with regard to the protection of personal data, accordingly, we shall also implement the findings of Article 29 Working Party of the European Commission in its Guideline on Transparency into our data processing practice.

2. General communication

With the use of our services available through our website Creators can upload and share their videos or music which they either have shared or have not yet shared on their social media channels and profiles. Creating their own user through registration on our website, Creators have the possibility to collect donations as creative support sent by Supporters. The Data Subject, either Creator or Supporter, using the services acquires access to the administration interface of their own user by registering their user profile on our website.

The registered users of our website – either Creators or Supporters – can get in touch with each other by communicating through internal messages and we have created some exclusive contents and functions on our website, as well. To use the exclusive functions, you need an additional registration through our website.

You can find detailed information about our data processing activities related to the use of our services and the registration through our website in Chapter 4 of this Policy.

For more information connected to the use of our services and the user profile registration procedure please see our General Terms and Conditions of Service.

3. Data of the controller

PATOL Karbantartó és Szolgáltató Korlátolt Felelősségű Társaság	
Abbreviated company name	PATOL Kft. / PATOL Ltd.
Registered seat	9142 Rábapatona, Rákóczi utca 1. A. ép.
Registry number	Cg. 08-09-006474 (Hungarian Company registry)
Tax number	11465104-2-08
E-mail address	joekomjati01@gmail.com
Telephone number	

4. Data processing procedures

We shall set forth in detail in this Section the essential circumstances regarding specific data processing which the GDPR and other sectoral legal acts require from every controller.

4.1 Creators' user profile registration

By creating a user profile through registration on our website, we allow creators to upload and share videos and music, collect donations, send internal messages and receive funds sent by donors as creative support. In addition, the creator has the option to create a so-called Tier. Tier is an exclusive optional feature and subscription available in the creator's user profile. By registering a Tier sub-profile, the creator has the option to upload and edit the description of the Tier, the profile picture, and to allow members to join the Tier, and in this context, to set the allowed number of the Tier-members and the monthly membership fee for joining the Tier, and to exchange internal messages with the members of his/her Tier.

Information on the pertaining data processing are detailed below:

4.1.1. Processed personal data and purpose of processing

personal data	purpose of processing	legal basis of processing
name	user's identification	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country article 6 section 1 b) of GDPR
user name	user's identification identification of the user profile	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country article 6 section 1 b) of GDPR
profile picture	user's identification identification of the user profile	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of

		the relevant national regulations of the data subject's country article 6 section 1 b) of GDPR
e-mail address	user's identification confirmation of the registration to send information about the use of service	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country article 6 section 1 b) of GDPR
password	technical safety operations	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country article 6 section 1 b) of GDPR
user's country	user's identification	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country article 6 section 1 b) of GDPR
data related to internal messages	to enable communication between users	article 6 section 1 b) of GDPR

4.1.2. Legal basis of processing

With regard to article 6 section 1 c) of GDPR processing is necessary for compliance with a legal obligation to which the controller is subject pursuant to the provisions of section 13/A. of Act CVIII of

2001 on certain issues of electronic commerce services and information society services (referred to as E-Commerce Act), and where applicable, the provisions of the relevant national regulations of the data subject's country.

With regard to article 6 section 1 b) of GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (please see our General Terms and Conditions of Service for more information about the contracting process with the users).

4.1.3. Duration of the processing

We shall process the provided personal data until deletion at the user's request. If the user does not use his account, his/her profile will be deleted after one year following the last activity.

4.1.4. Mode of processing

The personal data are collected in electronic form.

4.1.5 Provision of personal data

Given that we cannot provide the service without knowing the personal data contained in this section, the provision of personal data is a prerequisite for contracting with the user.

4.2 Contacting and communication

It is possible to connect us through our contact information located on the website. Also, by communicating with our business partners, we process the personal data of their contact person. contacts. The details of these processing are described hereunder.

4.2.1. Processed personal data and purpose of processing

personal data	purpose of processing	legal basis of processing
name	identification of the User, or the contact person of our business partner	article 6 section 1 a) of GDPR; article 6 section 1 f) of GDPR
e-mail address	contacting and communication with the User, or the contact person of our business partner	article 6 section 1 a) of GDPR; article 6 section 1 f) of GDPR
phone number	contacting and communication with the User, or the contact person of our business partner	article 6 section 1 a) of GDPR; article 6 section 1 f) of GDPR

4.2.2. Legal basis of processing

If the User contacts us through our website, we process the User's personal data based on his/her freely given consent provided by him/her by an express conduct (phone call, sending of an e-mail), at the moment of contacting, for the purposes set out in Section 4.2.1 (Article 6 section 1 point a) of GDPR).

Should we use the User's data for a purpose other than the original purpose of collecting such data, then we shall inform the User thereof and acquire his/her/its prior and expressed consent thereto, furthermore, we shall ensure the possibility to object to such processing (see Section 10.1).

If you, as the representative of our business partners provide your personal data to communicate with us, the legal basis of processing personal data is the legitimate interest of us and our business partners (Article 6 section 1 point f) of GDPR). It is each Party's legitimate interest to maintain an effective business communication during the use of the Website and the negotiations between the partners, and to perform the contract, and in order thereto, to provide information to the designated representatives of each Party, on the essential circumstances affecting such contract. Since it is the employment or contractual duty of the contact persons of the business partners to promote the communication between the Parties and to provide the personal data for that purpose, in our view, processing the name and contact data of your contact persons does not restrict disproportionately the privacy and freedom of self-determination of such persons. The contact person of our business partner may object to such data processing.

4.2.3. Duration of the processing

We process the personal data until the withdrawal of consent. The User has the right to withdraw his/her/its consent at any time. The withdrawal of consent does not affect the legality of processing based on consent before its withdrawal.

In relation to the processing of the personal data of our business partners' contact persons, we process their personal data until it is no longer necessary in relation to the purposes of communication, or as long as it is possible according to the relevant acts (5 years following the performance or the termination of the contract pursuant to the Civil Code, or 8 years following invoicing, in accordance with Act C of 2000).

4.2.4. Mode of processing

The personal data are collected in electronic form.

4.2.5. Data protection contractual clause

Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing concerning communicating with our business partners, we, as data controllers, while performing the contracts concluded with our business partners, both at the time of the determination of the means for processing, and at the time of the processing itself, implement appropriate technical and organizational measures, such as pseudonymisation, which are designed to implement data-protection principles, such as data minimization, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of GDPR.

4.3. Data processing concerning invoicing

Based on the contract concluded by and between us and the Creator, we are entitled to deduct 15% of the Creator's donations received from his/her Supporters as our service fee. All payments completed by Supporters are processed through Stripe's payment system (<https://stripe.com/en-hu/privacy>).

Once the service fee has been deducted, it is subject to Act C of 2000 on accounting (hereinafter referred to as Accounting Act). We issue monthly electronic invoices as accounting document to the Creators related to the service fee. The details of such processing are described hereunder.

4.3.1. Processed personal data and purpose of processing

personal data	purpose of processing	legal basis of processing
name	supporting the accounting treatment of the performance of the payment (economic event)	article 6 section 1 c) of GDPR, pursuant to section 166 of the Hungarian Accounting Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
address/registered seat in case of sole proprietors (ZIP code, city, street name, house number together)	supporting the accounting treatment of the performance of the payment (economic event)	article 6 section 1 c) of GDPR, pursuant to section 166 of the Hungarian Accounting Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
tax number of the sole proprietor	supporting the accounting treatment of the performance of the payment (economic event)	article 6 section 1 c) of GDPR, pursuant to section 166 of the Hungarian Accounting Act, and where applicable, the provisions of the relevant national regulations of the data subject's country

4.3.2. Legal basis of processing

With regard to article 6 section 1 c) of GDPR processing is necessary for compliance with a legal obligation to which the controller is subject pursuant to the provisions of section 5, subsection 1, Paragraph b) of Act CXII of 2011 on the Right to Informational Self-determination and on the Freedom of Information (hereinafter referred to as Information Act) and section 166, Subsections 1 to 3 of the Accounting Act, and where applicable, the provisions of the relevant national regulations of the data subject's country.

4.3.3. Duration of the processing

8 years after the issuance of the accounting document (with regard to section 166, subsection 6 of the Accounting Act, section 169, subsection 1 of the Accounting Act).

Where applicable, the provisions of the relevant national regulations of the data subject's country shall be taken into account, as well.

4.3.4. Mode of processing

Personal data are collected in electronic form.

By taking into account the provisions of the legal act on the rules of the digital archiving, the accounting document issued in electronic form shall be stored in a manner that the applied method shall ensure the provision and continuous readable form of all of the data of the document without delay and that excludes the possibility of subsequent modification.

4.3.5. Provision of personal data

Since we cannot perform our accounting obligations without knowing the concerning personal data, the provision of personal data is a statutory requirement.

4.4 Data processing concerning selfie identification of users

Our website offers the possibility to register as a creator or supporter, whereby the user can create his/her own profile as a creator or supporter. Once registered, creators can upload and share their own online content (videos, music, video clips and other contents) and supporters can donate to the creators the amount of money they wish to donate as creative support. In order to verify the identity of the users who register through our website, the user who creates a user profile is identified by a selfie photo taken by the user, which authenticates the user's profile. Each user must complete the selfie identification process after creating his/her profile. Without selfie identification, the basic functions of the user profile are not available.

The details of such processing are described hereunder.

4.4.1. Processed personal data and purpose of processing

personal data	purpose of processing	legal basis of processing
selfie of registered users (creators)	to ensure the security of our service and to prevent fraud registered user's identification	article 6 section 1 b) of GDPR

4.4.2. Legal basis of data processing

The data processing is necessary for the performance of the contract (General Terms and Conditions of Service) concluded by and between us and the User (creator). Without selfie identification, the basic functions of the user profile are not available (please see our General Terms and Conditions of Service for more information about the contracting process with the users.

4.4.3. Duration of the processing

Until the purpose of the processing is fulfilled: until the user's creator is identified and his/her profile is authenticated.

4.4.4. Mode of processing

Personal data are collected in electronic form.

4.4.5 Provision of personal data

Given that we cannot identify the user without knowing the personal data contained in this section, the provision of personal data is a prerequisite for the authentication, therefore given that we cannot provide the service without knowing the personal data contained in this section, the provision of personal data is a prerequisite for contracting with the user.

4.5. Data processing concerning Supporters' registration

You can register as Supporter through our website to donate creative support to Creators. In addition, the Supporter has the possibility to join the Tier created by the Creators depending the allowed number of Tier members set by the Creator. The Tier is an optional feature and subscription available in the Creator's user profile. To join a Tier, you as the Supporter must pay a membership fee set by the Creator. In case your Tier membership is terminated, you must turn off recurring membership fees in your own account. We will inform you in an e-mail of the termination of your Tier membership.

The details of such processing are described hereunder.

4.5.1. Processed personal data and purpose of processing

personal data	purpose of processing	legal basis of processing
name	user's identification	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
user name	user's identification identification of the user profile	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
profile picture	user's identification identification of the user profile	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
e-mail address	user's identification confirmation of the registration to send information about the use of service	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of

		the relevant national regulations of the data subject's country
password	technical safety operations	article 6 section 1 c) of GDPR, pursuant to section 13/A. of the Hungarian E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country

4.5.2. Legal basis of processing

With regard to article 6 section 1 c) of GDPR processing is necessary for compliance with a legal obligation to which the controller is subject pursuant to the provisions of section 5, subsection 1, Paragraph b) of Information Act and section 13/A. of E-Commerce Act, and where applicable, the provisions of the relevant national regulations of the data subject's country.

4.5.3. Duration of the processing

We shall process the provided personal data until deletion at the user's request. If the user does not use his account, his/her profile will be deleted after one year following the last activity.

4.5.4. Mode of processing

The personal data are collected in electronic form.

4.6. Data processing concerning Help Center service

Users can contact our Help Center in case they have any complaints concerning our services. We do our best to answer their questions or to handle any complaints. The details of such processing are described hereunder.

4.6.1. Processed personal data and purpose of processing

personal data	purpose of processing	legal basis of processing
name	identification of the User	article 6 section 1 c) of GDPR, pursuant to the provisions of Consumer Protection Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
e-mail address	contacting and communication with the User	article 6 section 1 c) of GDPR, pursuant to the provisions of Consumer Protection Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
phone number	contacting and communication with the User	article 6 section 1 c) of GDPR, pursuant to the provisions of Consumer Protection Act, and where applicable, the provisions of the relevant national regulations of the data subject's country
personal data contained in the records of oral complaints	handling the complaint investigating the complaint	article 6 section 1 c) of GDPR, pursuant to section 17/A. of Consumer Protection Act, and where applicable, the provisions of the relevant national regulations of the data subject's country

4.6.2. Legal basis of processing

With regard to article 6 section 1 c) of GDPR processing is necessary for compliance with a legal obligation to which the controller is subject pursuant to the provisions of section 17/A. of Act CLV of 1999 on consumer protection (referred to as Consumer Protection Act), and where applicable, the provisions of the relevant national regulations of the data subject's country.

Where applicable, the provisions of the relevant national consumer protection regulations of the data subject's country shall be taken into account, as well.

4.6.3. Duration of the processing

Subject to section 17/A. (7) of the Consumer Protection Act, the Data Controller shall keep the records of the oral complaints and a copy of the response to the complaint for 3 years from the date of record of the complaint.

Where applicable, the provisions of the relevant national consumer protection regulations of the data subject's country shall be taken into account, as well.

4.6.4. Mode of processing

The personal data are collected in electronic form and in the record of the oral complaints.

5. Data Subjects' rights

It is relevant to us that our data processing shall comply with the requirements of fairness, lawfulness and transparency. In light thereof, we shall present the rights of the data subjects in this Section, and thereafter we shall explain them in detail in Appendix 11.3.

The Data Subject may request free information on the details of the processing of his/her personal data and in cases laid down in legal acts, they may also request the rectification, erasure or blocking thereof, or the restriction of such processing, and they may also object to the processing of such data. The Data Subject may address his/her/its request for information and the request indicated in this Section to our contact information set out in Section 3.

5.1 Right to access

The Data Subject has the right to obtain confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to the personal data and the information regarding the details of processing.

5.2 Right to rectification

The Data Subject has the right to obtain from us without undue delay the rectification of inaccurate personal data concerning him/her and to have incomplete personal data completed, including by means of providing a supplementary statement.

5.3 Right to erasure

At the request of the Data Subject, we shall erase personal data concerning him/her, if the processing of such data is no longer necessary, if the Data Subject has revoked his/her consent thereto, if the Data Subject objects thereto or if the processing is unlawful.

5.4 Right to be forgotten

If we made the personal data public and are obligated to erase the Data Subject's personal data at request, we shall inform any such controller which was made aware of or could have made aware of the possibly published data of the Data Subject.

5.5 Right to restriction of processing

At the request of the Data Subject, we shall restrict data processing if the accuracy of the personal data is challenged, or the data processing is unlawful, or the Data Subject objects to the processing of data, or if we do not deem the provided personal data necessary in the future.

5.6 Right to data portability

The Data Subject has the right to receive the personal data concerning him/her, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller.

5.7 Right to object

The Data Subject has the right to object, on grounds relating to his/her particular situation, at any time to the processing of personal data concerning him/her based on the data processing purposes of legitimate interest (see Sections 4.2 and 4.5). In such a case, we no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. In case of objection, as a general rule, the personal data for such purposes may not be processed further.

5.8 Right to respond to requests

We shall examine the requests as promptly as possible following its submission to us, but not later than within 30 days, and in case of objections, within 15 days and we shall decide whether they are well founded, of which we shall notify the person submitting the request in writing. If we do not fulfil the request of the Data Subject then we shall inform him/her of the factual and legal reasons for denying thereof in our decision.

5.9 Possibilities for redress

Protecting personal data is of utmost importance to us, and we shall also respect your right of informational self-determination, therefore we strive to respond to all requests and claims in a correct manner and within the deadlines. With respect thereto, we ask you to contact us before possibly pursuing your claim before authorities and courts, for the purposes of submitting your complaint or request to us, in order to have your possible objections resolved as soon as possible.

Should this be unsuccessful, the Data Subject may

- pursue his/her rights and claims before the courts pursuant to Act V of 2013 on the Civil Code (the legal proceedings may be lodged before the regional court of the Data Subject's domestic or habitual residence; the list and contact information of the regional court may be viewed in the following link: <http://birosag.hu/torvenyszekek>) and
- turn to and submit a complaint to the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., telephone number: +36-1-391-1400, facsimile: +36-1-391-1410, e-mail address: ugyfelszolgalat@naih.hu, website: <https://www.naih.hu/panaszuegyintezes-rendje.html>, pursuing the claim online: <https://www.naih.hu/online-uegyinditas.html>, hereinafter referred to as NAIH) pursuant to the provisions of the Information Act.

6. Our procedure regarding requests for exercising rights

6.1 Informing recipients

We communicate any rectification or erasure of personal data or restriction of processing carried out, to each recipient to whom the personal data of the Data Subjects have been disclosed, unless this proves impossible or involves disproportionate effort. We also inform the Data Subject about these recipients at request.

6.2 Mode and deadline of notification

We provide information on actions performed at the request indicated in Section 5 within one month of the receipt of such request at the latest in electronic form, unless otherwise requested by the Data Subject. That period may be extended by an additional two months where necessary, taking into account the complexity and number of the requests. We inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

At the request of the Data Subject, an oral notification may also be granted, provided that the Data Subject offers an identification in any manner.

If we do not take actions at the request, we inform the Data Subject within one month of receipt of the request at the latest of the reasons for not taking actions and on the possibility of lodging a complaint at NAIH and seeking a judicial remedy (see point 5.9).

6.3 Monitoring

In exceptional cases, if we have reasonable doubts concerning the identity of the natural person submitting the request, we may request the provision of additional information necessary to confirm the identity of the data subject. This measure is required for the purposes of facilitating the confidentiality of data processing and preventing unlawful access to personal data as laid down in Article 5, Paragraph 1, Point f) of GDPR.

6.4 Costs of measures and notifications

We provide you information with regard to the requests concerning Section 5 and take the necessary measures to be carried out based thereon free of charge.

If the Data Subject's requests are manifestly unfounded or excessive, in particular due to their repetitive nature, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or we refuse to act at the request.

7. Possible recipients of personal data, processors

7.1. Website operation

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7.2 Online payment service providers

With regard to clause 3.4 of this notice, we are entitled to deduct 15% of the creator's donations as a service fee based on our contract with the Creator. The entire payment process is made through Stripe's payment system.

In connection with the use of the online card payment service, the User using the payment service accepts the terms and conditions of the payment service provider for the service. The terms and conditions of the payment service provider for the online card payment service will therefore apply to the payment transactions initiated by the User. The Payment Service Provider's Privacy Policy is available at <https://stripe.com/en-hu/privacy>.

7.3 Invoicing

.....

7.4 Sending internal messages/chat functions

.....

7.5 Using data processors

PATOL Kft. is entitled to transmit the personal data to its partners processing such data for it in order to perform particular functions for business purposes, including undertakings carrying out marketing, managing databases, back-up and disaster recovery, e-mail services based on a contract. These recipients constitute data processors pursuant to the data protection legal acts. The data processor may only perform its duties according to the instruction of the Company, it may not make individual decisions with respect to the management of your personal data. The Company previously made sure that the data processor has a registered seat in the territory of the European Union and it offers appropriate guarantees that the data processing by such an undertaking complies with the data protection legal acts of Hungary and the European Union. The data processor offers appropriate guarantees to the Company that it shall apply and maintain data protection measures ensuring the confidential processing, integrity and accessibility of the personal data processed by it.

7.6 Request of courts and authorities

Apart from the abovementioned, the Company shall also transmit the personal data of the Data Subject exclusively to courts or other authorities in the cases and in the manner laid down in legal acts, based on requests or obligations imposed on by legal acts or resolutions.

8. Data security

Our employees and the employees of the data processors have the right to get acquainted with the personal data of the Data Subject, to the extent necessary, for the performance of the tasks which belong to their job. We make all security, technical and organizational measures that guarantee the security of the data.

8.1 Organizational measures

We provide access to our IT systems with personalized rights. The “necessary and sufficient rights” principle applies to the allocation of accesses, consequently all employees may use our IT systems and services only to the extent necessary for the performance of their duties, with the appropriate rights and for the required time. Access to IT systems and services may only be granted to a person who is not restricted for security or other reasons (e.g. conflicts of interest) and who has the professional, business and information security knowledge required to use it securely.

We and the data processors undertake strict confidentiality rules in a written statement, and we are obligated to act in accordance with these confidentiality rules during the course of our activities.

8.2 Technical measures

The data is stored in the systems of our data processors, at cloud service providers.

We protect our internal network with multi-level firewall protection. In all cases, a hardware firewall (border protection device) is located at the entry points of the applied public networks. The data is stored redundantly, that is, in several places, so it is protected from destruction, loss, damage, or illegal destruction due to the failure of the IT device.

Our internal networks are protected from external attacks with a multi-level, active protection against complex malicious code (e.g. virus protection). The external access to the IT systems and databases is operated by us via an encrypted data connection (VPN).

We take steps to ensure that the IT tools and softwares continuously to comply with the generally accepted technological solutions in the market.

We develop systems, during our development, in which logging can be used to control and monitor the operations performed, and to detect incidents, such as unauthorized access.

Our server is protected and closed, located on the dedicated servers of the hosting provider.

By taking into account the recommendation of NAIH on the data protection requirements with respect to data processing on the website of political parties, we use *https protocol* on the website, which offers a higher level of security than the *http protocol*.

9. Cookies and analytical tools

In order to the proper functioning of our websites, we have placed smaller data files in computer devices of persons using the website (hereinafter referred to as users) in certain cases, similarly to most of the modern websites.

9.1 Concepts

Cookies are small text files, which the website places to the computer device (including mobile phones) of the user. Consequently, the website is able to “remember” the settings of the user (such as: applied language, letter size, design, etc.), therefore, it is not necessary to set it each time the user visits our website.

The pixel tag is a small tag or graphic element, which is placed on the services, on other websites, in e-mails or other downloadable materials other than the computers, mobile devices or web browsers unless the user downloads the content. The pixel tag does not store information on the computer, mobile device or web browser (although an e-mail or other downloadable material on the computer may contain such), therefore it may not be set, only by deleting the material including such pixel tag.

The “local shared object” is similar to the cookies with the difference that it is stored on the computer or on the mobile device but not in the web browser and it may include more than texts. The direction thereof required another method than those of the cookies, as indicated below. These are stored by the computers or mobile devices, and it may be set individually.

9.2 Technologies used on the Website

9.2.1. Main purposes

PATOL Kft. uses the above mentioned technologies for the provision of services, as a part thereof, for instance, the use of cookies assist in the appropriate division of the data flow between the servers. The purpose of part of the tools is to better examine the users’ needs, to further develop our services and to offer personalized contents and better experience for the users. These cookies may only be placed on the computers upon the user’s consent thereto.

9.2.2. Performance measurement and analytics

PATOL Kft. uses the technologies for monitoring the services and analysing the users’ activities. The placement of cookies assist in transferring the users’ needs to the servers and in measuring the duration of response (1) for the purposes of new developments; (2) in the statistical recordings of the website of the services, in monitoring the user’ activities and in determining where the user uses the services.

PATOL Kft. uses the cookies of third parties for measuring and analysing the above performance of the users, including the services of Google Analytics, Hotjar and Facebook Pixel. Unsubscribing from these may be carried out on the websites of the third parties’ services: by the Google Analytics Opt-out Browser Add-on.

Cookies placed for these purposes may only be installed upon the user’s consent thereto.

9.2.3. Ensuring the proper operation of the Website

By using the technologies, the use of functions with respect to certain services and the determination of the users' preferences are enabled. Selecting the "remember me" box when signing in is such a permanent cookie in the web browser which fills in the name of the user, while other cookies are appropriate for recording the preferences of the user (such as language or geographical location), by which the vulnerability of the web applications may be reduced.

Without placing cookies serving the operation of the website, the website would not operate as intended, therefore, we shall not request the user's consent to the placement of such cookies. If you do not wish for these cookies to be placed, please leave this website.

We do not use the cookies for identifying the user personally. These cookies only serve the abovementioned purposes.

9.2.4. Necessary cookies

PATOL Kft. uses storage parameters on its landing pages. Without these, the page in question could not be used:

Key	Type	App	Creator	Expiry	Description

9.2.5. Google Analytics

1. The Google Analytics is the web analysis service of Google Inc. („Google”). Google Analytics uses so-called “cookies”, text files, which are saved to the computers of the users, thereby facilitating the analysis of use of the website visited by the user.

2. The information generated by the cookies with respect to the website used by the user are generally placed to and stored in one of the servers of Google in the USA. By activating IP anonymization on the website, Google previously shortens the IP address of the user within the Member States of the European Union or in other countries that are party to the treaty on the European Economic Area.

3. Only in exceptional cases shall the full IP address be transferred to the Google server in the US and abridged there. On behalf of PATOL Kft., Google shall use these information to assess how the user used the specific website and to make reports pertaining to the activity regarding the website for PATOL Kft., furthermore, to perform additional services with respect to the use of the internet and the website.

4. In the scope of Google Analytics, the IP address transferred by the web browser of the user shall not be combined with other Google data. By appropriate configuration of the user's browser, you may prevent these cookies from being stored, nevertheless, we shall point out that in this case you may not be able to fully use all functions of this website. Furthermore, you have the option to prevent the collection of the users' data generated by the cookies and related to the use of the website (including your IP address) by Google as well as processing this data by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=h>

PATOL Kft. shall not automatically place Google Analytics code on the landing pages.

PATOL Kft. uses the technology indicated in this Section (Google Analytics) on its marketing page (<https://ticketninja.io>).

9.2.6. **Facebook Pixel**

The Facebook Custom Audience is the online analysing and advertising service of Facebook, Inc. (Facebook), by which PATOL Kft. gains information of the manner in which the users of the particular website use said website.

For the service of Facebook Pixel, the placement of cookies on the users' device is required. The Facebook pixels place cookies on the device, on which there is browsing regarding the specific website, the purpose of which is to collect an appropriate community to advertise to, to measure conversion between devices, aiming of advertisement and optimising them to the appropriate audience, presenting personalized advertisement, and preparing reports and statements of the website.

The user may regulate and set said data processing activity of Facebook in his/her Facebook and Google account, and the user himself/herself may consent to the data collection by Facebook cookies on the Website. Following signing in, the user may view these cookies in the Facebook Ads Settings and he/she shall set or modify the preferences with respect to the cookies. The user may give his/her consent to the cookies according to the specific type thereof, on the particular website.

PATOL Kft. uses Facebook Pixels on certain website, which shall only be loaded on the landing pages if the user accepts the recommended cookie settings which also includes the website analytics.

Should the user accept the cookies including the analytics on the landing pages, then the Facebook Pixel applied by PATOL Kft. be loaded in any case, irrespective of the fact whether the Data Subject set it out for itself. Based on these information, PATOL Kft. shall monitor and analyse all of its landing pages according to the following:

<https://developers.facebook.com/docs/facebook-pixel/reference>

PATOL Kft. uses the technology indicated in this Section (Facebook Pixel) on its marketing page (<https://ticketninja.io>).

10. Other provisions

10.1 Processing for different purpose

If we intend to further process the personal data for a purpose other than that for which the personal data were collected, we shall inform the Data Subjects thereof, we shall acquire their prior and expressed consent thereto and ensure the possibility for them to object to such processing.

10.2 Record of processing

To comply with Article 30 of GDPR, we maintain a record of processing activities (record of processing activities) which we are liable for.

10.3 Data breaches

Data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. In case of data breach, we are obligated to act according to Articles 33 and 34 of GDPR. We shall record data breaches by indicating the facts pertaining to data breaches, their effect and the measures taken to remedy them.

10.4 Amendments

We are entitled to unilaterally amend this Privacy Policy.

Effective as of:

PATOL Kft.
Controller

11 Appendixes

Appendix 11.1 The relevant legal acts

In the course of drafting this Privacy Policy, the Controller has taken into account the relevant effective legal acts and the international recommendations, with special regard to the following:

- 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 (GDPR)
- Act CXII of 2011 on the right of informational self-determination and on freedom of information (Information Act);
- Act V of 2013 on the Civil Code (Civil Code);
- Act CXXX of 2016 on the Code of Civil Procedure (Pp.);
- Act C of 2000 on accounting (Accounting Act);
- Act CLV of 1999 on consumer protection (Consumer Protection Act)
- Act CVIII of 2011 on electronic commerce and on information society services (Electronic Commerce Act).

Appendix 11.2 Definitions with regard to the processing of personal data

- 'controller' means the legal person, which determines the purposes and means of the processing of personal data;
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'data transfer' means making accessible of the data for a third person;
- 'data erasure' means making the data unrecognisable in a manner that the recovery of the data is no longer possible;
- 'marking of data' means the provision of an identification mark for the data for the purposes of differentiation;
- 'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
- 'destruction of data' means the entire physical destruction of the data carrier containing the data;
- 'processor' means the legal person, which processes personal data on behalf of the controller;
- 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.
- 'cookie' means the small data package (text file) sent by the web server and placed for a definite time on the Data Subject's computer, which the server, depending on its nature, may complement at the time the website is visited again, that is, if the web browser sends back a previously saved cookie, then the service provider processing such cookie has the possibility to combine the Data Subject's current visit with the previous one, but only with respect to its own content;
- 'data subject/Data Subject' means 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
- 'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- 'IP address' means the IP address, that is, an identification number of server machines in every network that uses the TCP/IP protocol for communication, which enables the identification of

the specific devices through the network. It is well-known that each computer device connected to the network has an IP address, by which it may be identified;

- 'personal data' means any information relating to the data subject;
- 'objection' means the statement of the data subject, by which he/she objects to the processing of his/her personal data and requests the termination of data processing or the erasure of the processed data.

Appendix 11.3 The rights o the data subject

Right to access

The Data Subject is entitled to receive access to the personal data being processed by us, at his/her request, submitted to any address as indicated in our contact details. In the scope thereof, the Data Subject may be informed of the following:

- whether his/her personal data are being processed;
- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed,
- where possible, the envisaged period for which the personal data will be stored,
- his/her rights
- the possibility for redress
- information in relation to the source of data

The Data Subject may request a copy of his/her personal data that is subject to the processing of data. In this case we shall provide the personal data in a structured, commonly used and machine-readable format (PDF/XML) and on paper, in a printed format. Requesting the copy is free of charge.

Rectification

Based on a request submitted to any address as indicated in our contact details, the Data Subject is entitled to request the rectification of the inaccurate personal data concerning him/her and to have the incomplete data completed. If we do not have the necessary information for the correction and completion of the incorrect information, we may request the provision of such supplementary data and the certification of the accuracy of the data. In the absence of such supplementary information, we shall restrict the processing of the relevant personal data and we shall temporarily suspend the measures carried out thereon with the exception of storing until such a time that the correction and completion of data may be performed.

Erasure

Based on a request submitted to any address as indicated in our contact details, the Data Subject is entitled to request the erasure of the personal data concerning him/her and processed by us, provided that any of the following conditions are met:

- we no longer need the provided personal data;
- the Data Subject expresses concern with regard to the lawfulness of his/her data being processed by us.

Should we determine based on the Data Subject's request that we are obligated to erase the personal data processed by us, we shall cease the processing of such data and we shall destruct the previously processed personal data. Besides that, we are also obligated to erase the personal data upon the revocation of consent, the exercising of the right to object and based on our obligations laid down in legal acts.

Restriction of data processing

Based on a request submitted to any address as indicated in our contact details, the Data Subject is entitled to request the restriction of the personal data concerning him/her processed by us in the following cases:

- the Data Subject expresses concern with regard to the lawfulness of the data concerning him/her, being processed by us and restriction is requested instead of erasure;
- we no longer need the provided data, but they are required for the establishment, exercising or defending of the Data Subject's claims.

We automatically restrict the processing of personal data if the Data Subject challenges the accuracy of the personal data and the Data Subject exercises his/her/its right of objection. In this case, the restriction shall extend to such a time period which enables the checking of the accuracy of the personal data and, in case of objection, the determination of the fact whether the prerequisites of the data processing are met.

During such restriction, the data processing measures of the indicated personal data may not be carried out, only the storage thereof. In case of the restriction of data processing, the personal data may only be processed in the following cases:

- based on the consent of the data subject
- for the submission, enforcement and protecting of legal claims;
- for the protection of the rights of other natural or legal persons;
- for important reasons of public interest.

We shall inform the Data Subjects of the lifting of the restrictions in advance.

Data portability

Based on a request submitted to any address as indicated in our contact details, the Data Subject is entitled to request the provision of personal data concerning him/her, and processed by us to further use determined by the Data Subject. Besides that, the Data Subject may also request that we transfer the personal data to another controller indicated by the Data Subject.

This right only covers the personal data provided by the Data Subject and processed for the performance of the contract. There is no possibility for the portability of other data. We shall provide the personal data to the Data Subject in a structured, commonly used and machine-readable format (PDF/XML) and on paper, in a printed format.

We inform the Data Subject that the exercising of this right does not automatically involve the erasure of such personal data from our systems. Besides that, the Data Subject is entitled to contact us and keeping in contact with us again, even following such data portability.

Objection

Based on a request submitted to any address as indicated in our contact details, the Data Subject is entitled to object to the processing of his/her/its personal data for the purposes indicated in Sections 4.1 and 4.5 of this Privacy Policy. In this case, we shall examine whether the data processing is justified by such mandatory legal reasons which take precedence over the interests, rights and freedoms of the Data Subject or which are pertaining to the submission, enforcement or protection of legal claims. Should we determine that such reasons exist, we shall continue processing the personal data. In failure thereof, we shall not process the personal data in the future.