

MORESIMP

Privacy Policy

TABLE OF CONTENTS

1. THE PURPOSE OF THE DOCUMENT	2
2. DATA MANAGER INFORMATION	3
3. DATA MANAGER ACTIVITIES.....	3
4. WHAT ARE YOUR RIGHTS?	5
5. MEASURES AND NOTIFICATIONS	8
6. POSSIBLE RECIPIENTS	9
7. COOKIES.....	10
8. OTHER PROVISIONS.....	11

1. THE PURPOSE OF THE DOCUMENT

We accept this Document for the purpose of providing all relevant information to the representatives of natural and legal persons (hereinafter: the Clients) using our services in a concise, transparent, comprehensible and easily accessible form, and to assist the Clients in the exercise of their rights under Section 4.

The legal basis of our duty to communicate information is Article 12 of Regulation 2016/679 of the European Parliament and Council (hereinafter: **GDPR**) applicable from 25 May 2018, and the Section 20 of the 2011 CXII. Regulation (hereinafter: **Information Act**) which deals with the right to information self-determination and freedom of information.

In the Privacy Policy, we may define you as “data subject”, or “contact person of our business partners” in the following.

2. DATA MANAGER INFORMATION

Name:	Moresimp Kft.
Registered seat:	1138 Budapest, Madarász Viktor utca 47-49.
Registry number:	01-09-952399
Tax number:	23089112-2-41
Electronic contact:	info@moresimp.com
Registering authority:	Metropolitan Court of Registration

3. DATA MANAGER ACTIVITIES

3.1. Invoicing

After the performing of the orders we – with regard to Act C of 2000 on accounting – make out a bill. The details of such processing are described hereunder.

3.1.1. Purpose of the personal data

We handle the names and addresses of our natural person clients (in case of a sole proprietor we handle their registered office) for the purpose of supporting the accounting for the execution of a transaction order (economic event).

3.1.2. Legal basis for processing

Processing is necessary for compliance with a legal obligation; with regard to section 6 paragraph 1 point f of GDPR, section 5 article 1 point b of Information Act and section 166 paragraph 1 to 3 of Act C of 2000.

3.1.3. Duration of the processing

8 years after accounting.

3.1.4. Mode of processing

Personal data are collected manually or in electronic form.

3.1.5. Provision of personal data

Since we cannot perform our accounting obligations without knowing any information about you, the processing is a statutory requirement.

3.2. Contact and fulfill orders

In addition to telephone and e-mail inquiries, you can also contact us using the form on our website to inquire or request a quote. Related data management details are shown below.

3.2.1. Purpose of the personal data

We handle the names of our Client for identification purposes, the e-mail address and telephone number for contacting purposes and for keeping in touch when fulfilling the order. Any other personal information (for example bank account details) provided by our Client during the execution of the order, we handle only for the purpose of fulfilling the contract.

3.2.2. Legal basis for processing

As our Client contacts us for the purpose of using a service or ordering our products and requesting information about them, Section 6 paragraph 1 point f of GDPR is required to take prior steps to the enter of a data management contract. The legal basis for data processing during the performance of the contract when using the chosen service or ordering a product is Article 6 (1) b) of the GDPR.

If the Client is a contact person acting on behalf of a legal person, the legal basis of the above mentioned personal data is the legitimate interest of a legal person represented by the Client and us (Article 6 (1) (f) GDPR). It is in the interest of both parties that business communication takes place effectively during the performance of the service and be able to provide information each other's representatives on any essential circumstances affecting the contract between us. Infringement of the right to information self-determination of the legal entity's contact person cannot be determined, because job or contractual obligation support communication and providing personal data between the parties.

3.2.3. Duration of processing

In the absence of any other data management purpose personal data is stored for one year after it is collected.

3.2.4. Mode of processing

Both on paper and in electronic form.

4. WHAT ARE YOUR RIGHTS?

You have the right to request free information about the details of the managed personal data and request rectification, erasure, blocking or restriction of handling in cases specified by law, as well as protest against the processing of such personal data. Requests for information and requests in this section can be addressed by our client to our contact details in section 2.

4.1. Right to access

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information featured in point 3. You have the right to access to the following information

concerning the processing of your personal data: 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, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing; the right to lodge a complaint with a supervisory authority; the existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

4.2. Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4.3. Right to erasure

You have the right to obtain from us the erasure of personal data concerning you without undue delay and we shall have the obligation to erase personal data without undue delay if it is mandatory according to Article 17 of GDPR. The erasure of your personal data is obligatory for us in the following instances: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent on which the processing is based, and where there is no other legal ground for the processing; you object to the processing and there are no overriding legitimate grounds for the processing; the personal data have been unlawfully processed; the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

4.4. Right to forget

If we made the personal data public and are obliged to erase your personal data, we inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

We do not make your personal data public.

4.5. Right to restrict data management

At the request of our client, we restrict data processing if the accuracy of personal data is disputed, or data processing is illegal or the client protests against data management or if we no longer need the personal information the Client has provided.

4.6. Right to data portability

You have the right to receive the personal data concerning you, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us if is possible according to Article 20 of GDPR. Where technically feasible, you have the right to have the personal data transmitted directly from us to another controller.

4.7. Responding to requests

The application will be examined as soon as possible after its submission, but within a maximum of 30 days (in the case of an objection, within 15 days) and we make a decision on its validity and the applicant will be informed in writing. If we do not comply with our Client's request, we will inform our Client of the factual and legal reasons for the rejection of the application.

4.8. Law enforcement

The protection of personal data is important to us, at the same time we respect our Client's right to information self-determination and we strive to respond all requests in a fair manner and on time. With this in mind, we ask our Clients to contact us before any official

and judicial claim is made to resolve any conflicts peacefully that erase with us. If the request does not lead to a result, our client can enforce the rights in court under Act V of 2013 on the Civil Code (the lawsuit may also be initiated before a court competent according to the residence of our Client) and in accordance with the provisions of the Information Act, you can apply to the National Data Protection and Freedom of Information Authority (*1125 Budapest, Szilágyi Erzsébet fasor 22/c.*; <https://www.naih.hu/panaszuegyintezes-rendje.html>, a továbbiakban: NAIH)

5. MEASURES AND NOTIFICATIONS

5.1. Informing Data subjects

We communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 of GDPR to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We also inform you about those recipients on the request of yours.

5.2. Mode and deadline of notification

We provide information on action taken on a request under Articles 15 to 22 of GDPR to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, we provided the information by electronic means where possible, unless you request it otherwise.

If we do not take action on your request, we inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the

possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy (see point 4.7.).

5.3. Monitoring

If we have reasonable doubts concerning the identity of the natural person making the request, we may request the provision of additional information necessary to confirm the identity of the data subject. This measure is necessary to prevent unauthorized access to personal data as defined in Article 5 (1) (f) of the GDPR.

5.4. Costs of measures and notifications

We provide you information and take the necessary measures free of charge. If your requests are manifestly unfounded or excessive, in particular because of their repetitive character, 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 on your request.

6. POSSIBLE RECIPIENTS

6.1. During the operation of our website

Details of the hosting provider of our website as the data processor:

Name: HumanoiT Kft.

Contact: H-1138 Budapest, Madarász Viktor u. 47-49.

6.2. During the fulfilment of orders

Our business partners may have access to your information but only for the purpose of task completion and tied to the purpose of the order, they are obliged to handle data in accordance with the applicable legislation.

6.3. Social media

Our website has several social media profile so that if you „like” us on Facebook or „follow” us on Instagram, we may learn all the personal data which is public on your profile. In case of data management that arises on these pages the relevant information can be found in the service provider's own data management policy.

6.4. Invoicing

When invoicing, the tax authority is entitled to know the personal data provided by the Data Subject for this purpose. Details of the tax authority:

Name: Nemzeti Adó- és Vámhivatal

Website, contact info: <https://www.nav.gov.hu/nav/kapcsolat>

7. COOKIES

For proper functioning of our website, in some cases we place small data files on the User's computer device (like the most modern websites).

7.1. What is a cookie?

A cookie is a small text file that the website places on the User's computer device (including mobile phones). Thanks to this, the website can "remember" the User settings (e.g. language used, font size, display, etc.) so the User doesn't need to reset settings each time she/he visit our website.

7.2. Our cookies

We record data about visitors from our website (IP address, browser type, etc.) to prepare statistical reports. The final result of these reports is not suitable for unique identification. Statistics are required for the development of our website and or services. These cookies

can be deleted or may be blocked, but in this case the website may not function properly. We do not use cookies to personally identify the visitor. These cookies are for the purposes described above.

7.3. How are cookies handled?

Cookies can be deleted (for more information: www.AllAboutCookies.org), or with most modern browsers cookie placement can also be blocked. In this case, when using our website, some settings need to be redone each time, and some services wont work definitely. Detailed information on deleting and blocking cookies can be found at www.AllAboutCookies.org (English) page and the following links regarding the browser used by the User:

- [Firefox](#)
- [Google Chrome](#)
- [Microsoft Edge](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Internet Explorer 10](#)
- [Microsoft Internet Explorer 9](#)
- [Microsoft Internet Explorer 8](#)
- [Safari 9](#)
- [Safari 8](#)
- [Safari 6/7](#)

8. OTHER PROVISIONS

8.1. 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 provide the you prior to that further processing with information on that other purpose and with any relevant further information.

9.2. Data protection

We secure your personal information from unauthorized access, use or disclosure. We secure the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as connection data) is transmitted to other Web sites, it is protected through the use of encryption.

9.3. Record of processing

To comply with section 30 of GDPR, we maintain a record of processing activities under our responsibility.

9.4. 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 act according to section 33 and 34 of GDPR.

9.5. Changes to our Privacy Policy

We will occasionally update this Privacy Policy to reflect feedback. We encourage you to periodically review this Policy to be informed of how we are protecting your information.

Effective: 08/07/2019

Moresimp Kft
Controller