

Privacy Policy and Cookie Policy
for the use of www.propatria-inc.com

If you have any questions or requests regarding this Privacy Policy, please contact us by e-mail at info@propatria-inc.com

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1. Data of Data Controller

PRO PATRIA ELECTRONICS Mérnöki Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság
(hereinafter: „PPE Kft.” or „Our Company” or „Data Controller”)

registered head office: 1097 Budapest, Könyves Kálmán boulevard 12-14. 3rd floor

e-mail address: info@propatria-inc.com

Phone No.: +36-1- 322-7010

Website: www.propatria-inc.com

This website, including the relevant subdomains ("**Website**") is operated by the Data Controller.

2. Your rights as the data subject

2.1 Right of access

The right of access entitles the data subject to have access to Personal Data relating to ongoing processing and to the following information

- a) the data processed
- b) the purpose of the processing
- c) the legal basis of the processing
- d) the duration of the processing
- e) who is receiving or has received your Personal Data and for what purposes
- f) your rights as data subject in relation to the processing,
- g) your right to lodge a complaint to the supervisory authority.

You have the right to request a copy of your Personal Data that are subject to processing.

2.2 Right to rectification

You have the right to contact the Data Controller in writing to request the rectification of your Personal Data processed by PPE Kft. if it is inaccurate. If your data is incomplete, you have the right to request that it be completed.

In case of rectification or completion you must certify the accuracy of the rectified or completed data.

2.3 Right to erasure

We will delete your Personal Data without delay if any of the following grounds apply:

- a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, or
- b) You withdraw consent on which the processing is based and there is no other legal ground for the processing, or
- c) You object to the processing and there are no overriding legitimate grounds for the processing, or

- d) the processing of your **Personal Data** is unlawful for any reason and we have become aware of it; or
- e) your **Personal Data** have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject;

2.4 Right to restriction of processing

You have the right to request the Data Controller to restrict the processing of your **Personal Data** where one of the following applies:

- a) the accuracy of the **Personal Data** is contested by You, (in this case the restriction refers to a period enabling the Data Controller to verify the accuracy of the **Personal Data**);
- b) the processing is unlawful and You oppose the erasure of the **Personal Data** and request the restriction of their use instead;
- c) the Data Controller no longer needs the **Personal Data** for the purposes of the processing, but they are required by You for the establishment, exercise or defence of legal claims;
- d) You have objected to processing (in this case the restriction will apply for the period necessary to determine whether the legitimate grounds of the Data Controller override those of the data subject)

2.5 Right to data portability

You shall have the right to receive the **Personal Data** concerning You, which You have provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from PPE Kft, if:

- a) the processing is based on Your consent, or the processing is related to the performance of a contract and
- b) the processing is carried out by automated means.

The exercise of the right to data portability must not infringe the right to erasure and the right to data portability must not adversely affect the rights and freedoms of others.

2.6 Right to object

You shall have the right to object, on grounds relating to your particular situation, at any time to processing of **Personal Data** concerning the Data Controller's legitimate interest including profiling based on those interests. In this case the Data Controller shall no longer process the **Personal Data** unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

3. Enforcement options

3.1 You may contact us using the contact details provided in this Privacy Policy to request that we:

- a) confirm whether or not **Personal Data** about You is being processed;
- b) provide You with further details about how we process your **Personal Data**;
- c) provide you with a copy of any data which we hold about You;

- d) update/correct any of your Personal Data;
 - e) delete any Personal Data which we hold about you;
 - f) restrict the way that we process your Personal Data;
 - g) consider any valid request to transfer your Personal Data to a third party provider of services (data portability);
 - h) consider any valid objections which you have to our use of your Personal Data.
- 3.2** If we rely on your consent for us to use your Personal Data in a particular way, but you later change your mind, you may withdraw your consent by contacting us at info@propatria-inc.com and Our Company will stop doing so. However, if you withdraw your consent, this may impact the ability for us to provide services to You.
- 3.3** We will consider all such reasonable requests and provide our response within a reasonable period (and in any event within the time period required by applicable law). We will also need to confirm your identity before acting on certain requests.
- 3.4** If you have a complaint about how we use your Personal Data, we would always prefer you to contact us first at info@propatria-inc.com. You also have the right to make a complaint to the national supervisory authority for Personal Data processing or to take legal action as provided by the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”).

In addition to this, if you consider that your rights are infringed, you may take legal actions at the tribunal competent at the head office of PPE Kft., as defendant, or – subject to your choice - at the tribunal competent at your place of residence or place of stay.

Thus, if you are not satisfied by the way we process your Data or the response received by us on any request from your side, you have the right to request an investigation by sending a report to the Hungarian National Authority for Data Protection and Freedom of Information. Full details regarding the language requirements and the form of the complaint may be accessed on the complaints section of the Hungarian National Authority for Data Protection and Freedom of Information's website: [<https://www.naih.hu/panaszuegyintezes-rendje.html>] and the contact details for submission of a complaint are as follows:

Addressee: Hungarian National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa street 9-11

Mail address: 1363 Budapest, P.O. Box 9.

Fax: +36-1/391-1410

E-mail: ugyfelszolgalat@naih.hu

Phone numbers: +36 (30) 683-5969

+36 (30) 549-6838

+36 (1) 391 1400

4. What Personal Data do we collect about you?

Depending on how you interact with the Website, we will collect and use any of the following data about you that we refer to as “**Personal Data**” throughout this policy:

4.1 *Personal Data we collect about you when you visit our Website*

Each time you visit the Website we will automatically collect any of the following data:

- a) Technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, domain name and country which requests the information, the files requested, browser type and version, browser plug-in types and versions, operating system and platform; and
- b) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to exit our site, data traffic, location data, weblogs and other communication data and information provided when requesting further service or downloads.

The Personal Data described in section 4.1 will remain anonymised and will be kept separately from the data described in sections 4.2 and 4.3.

4.1.1 How do we use the personal information we collect about you?

We will use your personal information only as necessary for any of the following purposes:

- a) To allow you to access and use the Website;
- b) To provide technical support;
- c) To ensure the security of our services and our Website;
- d) To recognize you when you return to our Website;
- e) To ensure that the Website is functioning correctly and to monitor, investigate any bug, and improve the Website;
- f) To provide you with the information, products and services that you request from us;
- g) For research purposes, where data will be anonymised where possible, to improve our products and services;
- h) To provide you with a tailored service;
- i) To improve your user experience;
- j) If you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters), but only where you have consented to this;

4.1.2 What is our legal justification for using your personal information?

The use of your Personal Data that Our Company collects when you visit our Website is necessary for our Company's legitimate interests (for example, to ensure the security of our Website). Our legitimate interests may include:

- a) run, grow and develop our business;
- b) detect and prevent fraud;
- c) operate our Website and keep our Website and IT systems secure;

- d) conduct marketing, market research and business development;
- e) provide goods and services to our customers, make and receive payment, provide customer services and to know the customer that we are providing services to; and
- f) conduct internal administrative activities

4.1.3 With whom do we share your personal information?

We will not transfer Your Personal Data to third parties except in the following cases:

- a) In order to provide and maintain the Website, we will share personal information with our trusted service providers for them to deliver technical, IT, hosting, logistical or administrative services and process the data for us in accordance with our instructions, and Our Company will verify that the recipient has appropriate security and confidentiality measures in place to protect the personal information;
- b) To the extent required or authorized by law, if we think it is necessary to comply with the law or if we need to do so to protect or defend our legal rights, or the rights of others (including to investigate and protect our users from fraudulent or unlawful use of the Website), we will share your personal information with third parties requiring information for legal reasons or third party investigators, authorities, regulators or law enforcement bodies.

4.1.4 How do we keep your personal information secure?

The security of your personal information is of paramount importance to us. We shall use appropriate technical and organizational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. All information that is collected through the Website is processed on secure data servers.

Upon providing your personal information to us, your personal information is likely to be transferred over the internet and/or stored on a cloud-based server. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet and storage in a cloud-based server is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk.

4.2 Personal Data that You provide when filling in the form on our Site:

When you send us a message through the Website to contact us, we collect the following types of personal information about You:

Scope of data processed	Purpose of data processing	Legal base of data processing	Duration of the data processing
<ul style="list-style-type: none"> - Your name - Your e-mail address - Personal Data given by you in letter 	Our response to your inquiry and provision of appropriate information	Your informed, voluntary consent to our Company by sending this letter.	Until the consent is withdrawn, but no later than 15 days after the inquiry has been dealt with.

You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

4.3 Personal Data that we collect from you during the recruitment process to fill a vacancy advertised by our Company:

Scope of data processed	Purpose of data processing	Legal base of data processing	Duration of the data processing
<ul style="list-style-type: none"> - Your name - Your phone No. - Your e-mail address - The information specified in the curriculum vitae (CV) you send to Our Company (including, but not limited to: your address, education, previous jobs and positions) - The date of your application - Our letter sent to the person concerned. 	The conduct of the recruitment process, so it is primarily <ul style="list-style-type: none"> a) identifying You, b) contacting You, c) facilitating the recruitment of the most suitable staff. 	The processing (during the recruitment process) 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.	<p>If the applicant withdraws his/her application for any reason, Our Company will delete your data provided during the recruitment process immediately after processing this written request.</p> <p>If the data subject is not hired, your Personal Data provided in the selection process will be deleted without delay after the expiry of the probationary period of the person holding the job and by this date the employment relationship is not terminated.</p>

Who do we share your Personal Data with when recruiting?

Only our Company has access to Your Personal Data during the recruitment process, there is no data transfer.

5. Cookie Policy and Google Analytics information and links on the Website

About the purposes and operation of cookies

The Website uses cookies to provide certain functions (for example, to display relevant content) or just for the user's convenience (for example, to avoid having to enter the necessary information each time you make a comment).

Cookies are small packets of data that are downloaded by the user's web browser from websites visited and stored on the user's computer. Most browsers accept cookies by default, but this can usually be changed to reject or ignore them.

In the process, the server of the visited page creates a unique identifier. It stores this in its own database and sends the cookie to the user's computer. When the user's computer contacts the server again, it attaches the previously stored cookie. The server identifies the user by comparing the content of the cookie it receives with the content of the cookie it has stored.

Forms of cookies

Cookies can be used for **analytical purposes**, for example to check how much time a user has spent on the site, etc. Such cookies are used by Google Analytics, which is used for web traffic analysis. These cookies do not usually contain Personal Data and are not suitable for identifying the user.

Cookies from various **social networks** (for example: LinkedIn, YouTube) allow the user to easily access social media networks. These cookies may contain Personal Data and can be used to identify the visitor.

There are also so-called **functional cookies**, which remember, for example, the user's name and e-mail address so that they do not have to re-enter it on their next visit. These cookies may contain Personal Data and can be used to identify the visitor.

The website may also occasionally display various content through **external web services**, which may result in the storage of cookies that we do not control. We therefore have no control over the information these websites collect about the user.

Managing cookies

There are several ways for the user to set cookie management. In general, different browsers can ask you to

- to accept all cookies,
- reject all cookies,

- reject certain cookies,
- notify You of each cookie usage, etc.

You can find information about cookie settings in the "Options" or "Settings" menu of your browser.

When visiting the Website, you can access links to websites operated by third parties other than the Data Controller. Please note that this Privacy Policy only applies to Personal Data we collect from or about You and we are not responsible for Personal Data collected or stored by third parties. Websites operated by third parties have their own terms of use and privacy policies and You should read those carefully before providing any Personal Data to those websites. We do not endorse or otherwise assume any responsibility or warranty for the content of such third party websites or third party terms of use or Policies.

The data transmitted are only data which cannot be identified by the Data Controller. For more information about Google's privacy policy, please visit: <https://policies.google.com/privacy?hl=hu>

6. How we modify this Privacy Policy

Any changes we make to this Privacy Policy in the future will be posted on this page.