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Online availability: <http://www.irodacenter.com/download/pp.pdf>

Details of the Service Provider

Name: CGSI LTD.

Head office: H-1023 Budapest, Bécsi way 3-5. floor IV / 38.

Company Registration Number: 01-09-724599

Website: www.irodacenter.com

TAX Number: 14305360-2-41

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EU VAT Number: HU14305360

Phone: +36 1 388 4181

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BY USING IRODACENTER.COM HOMEPAGE YOU ACCEPT THESE TERMS AND CONDITIONS.

With respect to the fact that you are using our services we wish to inform you how we store and use the information you share with us. We forward the information you give during your order to our partners cooperating in the fulfillment of our services filtered by the necessity of the fulfillment and with respect to the expected confidentiality. We use the collected data exclusively for the fulfillment of your order and to stay in touch with you. No third parties have access to the data you share with us.

1. Preamble

- 1.1. www.irodacenter.com website („Homepage”) is created to introduce and sell international business services e.g: company registration, company formation, selling companies, company registration, internet, telecommunication, marketing and attached services, where some services can be ordered instantly.
- 1.2. With respect to the operation of the website „as is”, the information provided on the website will describe the use of the term.
- 1.3. This privacy policy („Policy”) describes the privacy policy regarding the processed data and registers carried out by CGSI Kft. („Data controller”) during its activity, with special respect to the regulations on data management, data processing, data transmission.
- 1.4. The Data controller accepts the content of this Privacy Policy as bounding for himself. The Data controller undertakes the commitment that all data processing during his activity meets the requirements laid in this Policy and in the law in force.
- 1.5. This Policy is available on <http://www.irodacenter.com/download/pp.pdf> website. The Data controller reserves all rights to modify this Policy. The Data controller is committed to inform the public about all modification of this Policy.
- 1.6. The purpose of this Policy is to define the major rules of the data processing carried out by the Data controller, to define the orders of the liability, to provide the legal operation of the registers that the Data controller keeps and to provide the enforcement of the

institutional principals of data protection and other requirements of data protection and to prevent any unlawful access, modification and unlawful publication of these data.

2. Scope of this Policy

- 2.1. Territorial scope: all fields of the available services on this homepage.
 - 2.2. Temporal scope: this Policy is valid from the date of issue until any modification or until cancellation.
 - 2.3. Personal scope: covers all natural persons, legal persons and organizations without legal personality who use this Homepage („User”, or „Users”).
 - 2.4. Objective scope: the scope of this Policy covers the full data processing related to the Users' data collected and stored by the Data controller.
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3. Legal background of this Privacy Policy

- 3.1. Act CXII. of 2011 – on information self-determination and freedom of information;
 - 3.2. Act V. of 2013 – on the Civil Code (Ptk.);
 - 3.3. Act CVIII. of 2001 – on certain issues of electronic commerce activities and information society services (Eker. tv.);
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4. Definitions

- 4.1. Concerned person: any – directly or indirectly – identified or identifiable natural person based on their personal data;
- 4.2. Personal data: any data related to the Concerned person – especially the name, ID, or one or more physical, physiological, mental, economical, cultural or social note that identifies –, and any conclusions related to the concerned person;
- 4.3. Confirmation: the definite and voluntary expression of the concerned person's wish based on appropriate information where he clearly agrees to process all his personal data – fully or covering particular steps.
- 4.4. Objection/Withdrawal: expression of the Concerned person where he objects to the process of his personal data and requests to stop the data management and asks to cancel his processed data;
- 4.5. Data controller: any natural or legal person or organization without legal personality that defines the purposes of the data management independently or with others, makes decisions about the data management and executes them (including the tools), or has a hired data processor to execute them;

- 4.6. Data management: any actions or all actions carried out on the data irrespectively of the used practice, in particular the collection, registration, recording, organizing, storage, modification, use, query, transmission, publishing, synchronization or connection, blocking, cancellation and destruction and the prevention of the further use of the data, taking photographs or video or voice recording, and recording any physical attributes that can be used for personal identification (e.g. finger or palm print, DNS-sample, iris picture);
- 4.7. Data transmission: making the data accessible for certain third persons;
- 4.8. Publishing: making the data accessible for the public;
- 4.9. Data cancellation: making the data unidentifiable in a way that they cannot ever be identifiable again;
- 4.10. Marking the data: giving the data an identification number for distinction;
- 4.11. Data retention: giving the data and identification number in order to limit its further process for a definite time or for good;
- 4.12. Data destruction : physical destruction of the data carrier;
- 4.13. Data processing: all tasks related to the data management activity irrespectively of the method or tools used for the execution of the actions and of the location of the practice, in case such technical tasks are executed on the data;
- 4.14. Data processor: any natural or legal person or organization without legal personality that carries out the data process based on a contract with the Data processor – including contracts based on law;
- 4.15. Third parties: any natural or legal person or organization without legal personality that is not identical with the concerned person, the Data controller or the Data processor;

5. Principals of the privacy policy

- 5.1. Personal data management is allowed if
 - 5.1.1. the Concerned person agrees
 - 5.1.2. the local government orders such for public purposes based on any act or authorized by any act for the purposes described in the order and for public purposes (obligatory data management).
- 5.2. Personal data can be processed even if the agreement of the concerned person is unobtainable or has disproportionate cost, and the process of the personal data is necessary because of legal requirements applied to the Data controller, or necessary because of legal interests of the Data controller or any third party and such interests are proportionate to the limitation of the protection of personal data.
- 5.3. The legal representative' s confirmation is required for all declarations of any incompetent person or person of diminished legal capacity under age 16, except for the services where the purpose of the declarations is general data management in large numbers and do not require special consideration.

- 5.4. If the Concerned person is not able to give confirmation due to incompetence or any other unavoidable reason, the data of the concerned person can be processed during the existence of the obstacles of the confirmation and in the needed extent for the protection of his own or other persons essential interest, for the prevention of dangers threatening human life directly, physical integrity or their property.
- 5.5. In case the personal data was collected without the confirmation of the Concerned person, the Data controller may manage the collected data unless otherwise stipulated by law
 - 5.5.1. in order to fulfill any legal obligations applied to him, or
 - 5.5.2. in order to enforce the rights of the Data controller or any third person if the enforcement of such rights is measured to the right of the protection of the personal data without any further confirmation and he can manage these data even after the confirmation is withdrawn.
- 5.6. Personal data may be managed only for particular reasons, for practicing rights, and for the fulfillment of obligations. The data management must serve this purpose in every stage, and the collection and management of the data must be fair. Only such personal data can be managed that is necessary for the realization of the purposes of the data management, serves the purpose, and only in the extent and time needed for the realization of the purpose.
- 5.7. Personal data can be managed only based on the appropriate information and on agreement. Prior to the start of the data management, the Concerned person must be informed that the data management is based on his agreement or that it is obligatory. The Concerned person must be informed – clearly, understandably and detailed – about all facts related to the management of his personal data in particular about the purposes and the legal basis of the data management, about the person authorized for the management and processing of the data, the duration of the data management, about whether the personal data of the Concerned person is managed with his confirmation and whether it is managed for the purpose of legal requirements or for the legal interest of any third person, as well as about the list of people who have access to his data. Such information must cover the Concerned person's rights and legal remedies related to the data management.
- 5.8. During the data management the accuracy, completeness, up to date of the data must be available as well as that the Concerned person can be identified only during the time it is needed for the fulfillment of the data management purposes.

6. Scope of the personal data, purposes of the data management, legal title and duration

- 6.1. The data management activity of the Data controller is based on voluntary agreement. Yet in certain cases legal regulations oblige to manage, store and forward certain parts of the given data.
- 6.2. Data of the visitors of the website

Purposes of the data management: managing the orders, sending messages and newsletters
Legal basis of the data management: the Concerned person's confirmation

Scope of the managed data: name, address, e-mail address, telephone number, and other personal and company data needed for the ordered services, and other given data required on the order form

Duration of the data management : until withdrawal

7. Other data management

- 7.1. The Data controller will give information about the data management not listed in this Privacy Policy when collecting the data. Court, prosecution, investigating authorities, offence authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information and other authorities entitled by law may contact the Data controller for information, data transmission, data transfer or for providing documents. The Data controller may give personal information to the authorities – in case the authority named the purpose and the scope of the requested data – in the extent that is necessary to fulfil the purpose of the request.

8. Data storage

- 8.1. The Data controller carries out the personal data management related to this Website in his registered office.
- 8.2. The Data controller shall select and operate the IT tools for the data management in order to give access to the authorized circles, and have data protection against unauthorized circles.
- 8.3. The Data controller protects all data with proper measures especially against unlawful access, modification, transmission, publication, cancellation or destruction, accidental destruction, damages, and against the inaccessibility related to the changes of the used IT.
- 8.4. The Data controller protects the security of the Data management with technical, logistic and organizational measures, that provides an appropriate level of protection against the risks threatening the Data management.
- 8.5. Some well known web services also run on our website from google, facebook and addthis, who store the data they use - mostly statistical data - in a different, separated files (COOKIE/IP). These providers have no access to the clients' data managed by the Data controller, nor to his files. These services facilitate only the unique and social operation of our website.
- 8.6. COOKIE
Like many other modern websites, irodacenter.com uses the browser so called COOKIE, which is stored on the User' s (client) computer. The User' s current activity on the website, current status flags and temporary data improving the website service are stored in these files, which data is protected by the Data controller with special codes against data theft carried out by using the defaults of the browser, therefore such data can be read only through the connected services system of irodacenter.com. Beyond the listed, the Data controller uses cookies also for statistical data storage and for improving our website services.
- 8.7. IP address
IP address is a unique sequence of numbers on the internet that is automatically generated for the particular device when the User connects the Internet so it allows a unique identification. We use our Users' IP address for collecting and analyzing our visitors' statistics, yet they are used also in the form and website security. The improper and unlawful use of the website, especially modifying

the links on the website, count as illegal activity for the system and as a consequence, the system may reject the requests from that IP address therefore the website will be unavailable from the blocked IP address for a while.

8.8. Collecting data

In general we collect the information we ask on the form published on our website, which information is registered in the database of irodacenter.com website. No third parties have access to this database. The data stored in this database is needed to use and operate the services ordered via irodacenter.com website, therefore the given data will be listed in our database until the services are cancelled or requested to.

8.9. We use the collected data for providing, protecting, maintain and improve our services, to develop new services, and to protect the Website and our users.

8.10. We may not check the authenticity of the provided information but we will delete records causing service error arising from fake data, in case the owner is unidentifiable and unavailable.

8.11. Data of the Data controller

Name	CGSI Kft
Registered address:	H-1023 Budapest, Bécsi ut 3-5. floor IV / 38.
Company reg. nr.:	01-09-724599
Tax number:	14305360-2-41
Telephone:	+36 1 388 4181
E-mail:	info@irodacenter.com

9. Legal remedies

9.1. The Concerned person may request information about the management of his personal data as well as he can request the correction of his personal data, and – except for the obligatory data management – cancellation or blocking his data as informed at the time of the data collection, or such requests can be submitted via the Data controller's given contact.

9.2. The Data controller will give information about the managed data, their sources, the purposes of the data management, legal basis and duration for the Concerned person's request. The Data controller will give the requested information in written and in a comprehensible form as soon as possible but no later than within 30 days after the submission of the request. Such information is free of charge.

9.3. The Data controller will correct the personal data if they are not real and the real personal data is available.

9.4. The Data controller will block the personal data if the Concerned person has such request, or if based on the available information, it is assumable that the cancellation may conflict the legal interests of the Concerned person. The blocked personal data can be managed exclusively until the purpose which excluded the cancellation of the personal data is still in force.

- 9.5. The Data controller will cancel the personal data if such data management is illegal, for the Concerned person's request, the stored data is wrong or incomplete – and this status has no legal remedies – in case the cancellation is not forbidden by law, the purpose of the data management is cancelled, the duration of the data storage is expired by law, also if ordered by court or by the National Authority for Data Protection and freedom of Information.
- 9.6. The Data controller will inform the Concerned person about any correction, blocking or cancellation. He will not inform the Concerned person if it does not conflict the legal interests of the Concerned person with respect to the purposes of the data management.
- 9.7. The Concerned person may object against the management of his personal data in cases determined by law. The Data controller will examine the objection as soon as possible but no later than within 15 days after the submission of the request, will make decisions on its reasoning, and will inform the Concerned person about the decision in written. If the Data controller establishes that the objection is grounded, the data management will be closed and the data will be blocked. In case the Concerned person disagrees with the Data controller's decision, he may go to court – within 30 days after the information is delivered.
- 9.8. The Data controller may not cancel the data of the Concerned person in case the data management is ordered by law. Data may not be forwarded to the data recipient in case the Data controller confirmed the objection or the objection is lawful by court decision.
- 9.9. The Concerned person may go to court in case of violation of his rights. The court will act with high priority in such cases.
- 9.10. The Data controller will pay the damages caused by the unlawful data management or by breaking the laws of data protection. The Data controller will be released from liability if the damage is caused by unavoidable reasons beyond the matters of data management. The damages will not be paid in case the damage is caused by the intentional or seriously negligent behaviour of the injured party.
- 9.11. Complaints and legal remedy can be submitted and requested at the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Address: H-1051 Budapest, Nádor street. 22.

Mail address: 1387 Budapest, Pf.: 40.

Telephone: +36 1 475 7186, +36 1 475 7100

Telefax: +36 1 269 3541

10. Liability limitation

- 10.1. The content of this website can be refreshed, updated, completed anytime. The Data controller makes the best efforts to publish appropriate and up to date information, yet is not liable for the accurate content and up to date information of this Website, and is not liable for the errors, deficiencies, and for the out of date status of the published information.
- 10.2. The Website is not liable for the content of other internet websites linked on this site and is not liable for the content of the websites that link our website. Our Website is also not liable for the damages caused by the access, by the computer or other devices, by viruses on the linked Website or by any other reason.

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