# **Privacy Policy Statement**

Effective Date: 2018.05.01

# Personal Data Processor (the "Processor")

Company name: Integral Impulzus Kft

Registered seat: HU- 1024 Budapest, Lövőház utca 24. 2/2/a.

E-mail: info@integraleuropeanconference.com

**Telephone:** +3614424685

Website: https://integraleuropeanconference.com

# **Hosting Service Provider**

Company name: Magyar Hosting Kft.

Mailing address: HU-1132 Budapest, Victor Hugo utca 18-22.

E-mail: info@mhosting.hu

# Data processing activities in relation to your e-purchases and payments

### Use of cookies

### What is a cookie?

In the course of your visiting our website, the Processor uses cookies. Cookies are files comprised of letters and numbers that our website sends to your browser for the purposes of saving its certain settings making it easier for you to use our website, and facilitating us in collecting relevant information about our visitors for statistical purposes.

Some of the cookies do not include personal data and are not capable to identify individual users, others, however, include a random cryptic sequence serving as a unique identifier which will be stored on your computer's hard drive, thereby ensuring your identifiability. Operational term of each cookie is included in such cookie's description below.

#### Legal grounds and legal framework of cookies:

Our data processing is based on your consent thereto pursuant to Article 6(1) of Regulation (EU) 2016/679 of the European Parliament and of the Council.

### Main features of cookies used by our website:

**Google Adwords cookie:** When visiting our website, the visitor's cookie-identifier is added to the remarketing list. Google uses cookies – such as NID and SID cookies – in Google products, in order, for example, to customize ads in Google Searches. Such cookies are used, for example, to record your last searches, your previous interactions with advertisers or search results, and your

visits made at the websites of such advertisers. In its conversion tracking, AdWords uses cookies too. When someone clicks on an ad, AdWords saves cookies on the user's hard drive for the purpose of tracking sales arising from such ad and other conversions. Some frequent use of cookies: selecting ads relevant to a specific user, perfecting reports on campaign efficiency, and avoidance of repeated show of ads already seen by the user.

**Google Analytics cookie:** Google Analytics is an analytical tool of Google helping owners of websites and applications to obtain a clearer picture of activities of their visitors. Such tool may use cookies to collect information and generate reports from statistical data on the use of the website, without the personal identification of visitors for Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reports generated from statistical data on uses of the website, Google Analytics can be used – together with the above mentioned advert cookies – may be used to offer more relevant ads in Google products (e.g. in the Google Search) and all over the internet.

**Remarketing cookies:** Such cookies may appear when previous visitors or users are browsing on websites belonging to the Google Display Network or searching for expressions related to products or services.

**Cookies essential for operation:** Such cookies are essential to the use of the website and are necessary for the use of the basic functions of the website. Without them a number of website functions will not be available for you. Term of such cookies is strictly limited to the actual session time.

**Cookies improving user experience:** Such cookies collect information on the user's website visiting habits, such as, what pages the user visits most frequently or what kind or error messages the user receives from a website. Such cookies do not collect information that could identify the visitor, thus they operate with only general, anonym information. Data extracted from such cookies are used for improving the performance of our website. Term of such cookies is strictly limited to the actual session time.

**Session cookie:** Such cookies store visitors' location, language of the browser used, currency of payment; their term ends upon closing of the browser but not more than 2 hours.

**Referer cookies:** They keep reference to the outer website where the visitor arrived at our website from. Their term ends upon the closing of the browser.

**Recently viewed products cookie:** It keeps score of the products that the visitor viewed most recently. Its term is 60 days.

Lastly viewed category cookie: Keeps score of the category lastly viewed by the visitor. Its term is 60 days.

**Recommended products cookie:** The "I recommend this" function keeps score of the list of products you wish to recommend. Its term is 60 days.

**Mobile version, design cookie:** Recognizes the visitor's hard drive and switches on full view mode in case of mobile. Its term is 365 days.

**Cookie acceptance cookie:** Upon arrival at the website, it accepts the Cookies Privacy Statement. Its term is 365 days.

Basket cookie: Keeps score of the products placed in the basket. Its term is 365 days.

**Intelligent offer cookie:** Includes conditions of coming up with intelligent offers (e.g. has the visitor attended the website before, has the visitor made any orders). Its term is 30 days.

**Cookie #2:** Pursuant to the #2 option, the system shall quit the visitor after 90 days. Its term is 90 days.

**Backend identifier cookie:** The identifier of the backend server of our website. Its term expires upon the closing of the browser.

**Facebook pixel (Facebook cookie):** Facebook-pixel is a code facilitating the website to prepare report on conversions, to compile target groups, and to provide the website owner with detailed analytics on the visitors' website use. With the use of the Facebook pixel, visitors may receive on their Facebook interface customized offers and targeted ads. Learn more about Facebook's privacy policy here: https://www.facebook.com/privacy/explanation.

If you do not accept the use of cookies, you may not be able to use some functions of our website. Learn more about deletion of cookies on the following links:

- Internet Explorer: http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11
- Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer
- Mozilla: https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito
- Safari: https://support.apple.com/kb/ph21411?locale=en\_US
- Chrome: https://support.google.com/chrome/answer/95647

# Personal Date processed for contracting and performance

Contracting and performance may result in multiple processing of data. Please be informed that any data processing in relation to handling of complaints or guarantee claims will only take place if you initiate such remedies.

Should you only visit our website without making any purchase through it, provisions on data processing for marketing purposes may apply to you in case you give us your consent for marketing purposes.

Details of data processing for contracting and performance are as follows:

# Contact

In case you eventually contact us via e-mail, contact form or telephone with any question regarding a product.

#### Data processed

Data given by you when contacting us.

#### Term of processing

Only up to the completion of the actual contact.

#### Legal grounds for data processing

Your voluntary consent given by contacting us/the Processor. [Data processing pursuant to Article 6(1)(a) of the GDPR]

### **Registration on the website**

By storing your data given upon registration, the Processor is able to provide more convenient services to you.

#### Data processed

The Processor shall process your name and e-mail address.

#### Term of processing

Up to the withdrawal of your consent.

#### Legal grounds for data processing

Your voluntary consent given by your registration. [Data processing pursuant to Article 6(1)(a) of the GDPR]

### Processing your purchase

Processing your data in the course of processing your purchase and necessary for the performance of the order.

#### Data processed

The Processor shall process your name, address, telephone number, e-mail address, description of the product/service purchased, order number and time of purchase.

In case you complete a purchase through the website, provision of the above data and their processing is necessary for the performance of the purchase contract.

#### Term of data processing

We process the data for 5 years, in accordance with the statute of limitation under civil law.

#### Legal grounds for processing

Performance of contract. [Data processing pursuant to Article 6(1)(b) of the GDPR.]

### **Issuing invoices**

Data are processed in order to issue invoices and keeping accounting documents in compliance with applicable laws. Pursuant to Article 196 Paragraphs (1) and (2) of Act No 100 of 2000 on Accounting ("Accounting Law"), business entities must keep accounting documents supporting, directly or indirectly, their bookkeeping.

#### Data processed

Name, address, e-mail address, telephone number.

#### Term of data processing

Pursuant to Article 169 Paragraph (2) of the Accounting Law, invoices must be kept for the period of 8 years from their issue.

#### Legal grounds for processing

Pursuant to Article 159 Paragraph (1) of the Act No 127 of 2007 on General Value Added Tax ("VAT Law") it is mandatory to issue invoices and they must be kept for the period of 8 years pursuant to Article 169 Paragraph (2) of the Accounting Law. [Data processing pursuant to Article 6(1)(c) of the GDPR.]

### Handling consumers' claims

Date are processed for the purpose of handling consumers' claims. If you raise a claim/complaint with us, provision of the above data and their processing is inevitable.

#### Data processed

Name, telephone number, e-mail address of the customer, description of the claim.

#### Term of data processing

Pursuant to the law on consumers protection, warranty claims are retained for the period of 5 years.

#### Legal grounds for data processing

It is your voluntary decision to raise a claim/complaint with us. Should you elect to do so, pursuant to Article 17/A Paragraph (7) of Act No 155 of 1997 on Consumers Protection, we are under the obligation to retain such claim/complaint for the period of 5 years. [Data processing pursuant to Article 6(1)(c) of the GDPR.]

# Data processed for the verification of your consent

Upon your registration, subscription for a program or on our newsletter, our IT system stores IT data in connection with your consent for further verification and evidence thereof.

#### Data processed

Time of consent given and IP address of the client.

#### Term of data processing

Since according to the law, we have to be able to subsequently evidence your consent, your data will be stored for the period of the statute of limitation after termination of processing.

#### Legal grounds for data processing

Article 7(1) of the GDPR provides for such obligation. [Data processing pursuant to Article 6(1)(c) of the GDPR.]

# Data processing for marketing purposes

# Data processing in relation to sending newsletter

### Data processed

Name, address, e-mail address, telephone number.

#### Term of data processing

Up to withdrawal of your consent

#### Legal grounds for data processing

Your voluntary consent that you give by your subscription for our newsletter. [Data processing pursuant to Article 6(1)(a) of the GDPR.]

# Sending and cinematization of targeted ads

#### Data processed

Ágnes Vörös, info@integraleuropeanconference.com

#### Term of data processing

Up to withdrawal of your consent.

#### Legal grounds for data processing

Your specific, voluntary consent that you give to the Processor by giving your data. [Data processing pursuant to Article 6(1)(a) of the GDPR.]

# Remarketing

Such data processing is completed with the use of cookies.

#### Data processed

Data processed by the cookies, in accordance with their description.

#### Term of data processing

The processing term of the relevant cookie. Learn more here:

Google general cookie privacy notice: https://www.google.com/policies/technologies/types/

Google Analitycs notice:

https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu

Facebook privacy notice: https://www.facebook.com/ads/preferences/?entry\_product=ad\_settings\_screen

#### Legal grounds for data processing

Your voluntary consent that you give to the Processor by the use of the website. [Data processing pursuant to Article 6(1)(a) of the GDPR.]

# **Contact by telephone**

#### Data processed:

Ágnes Vörös, info@integraleuropeanconference.com, (+36) 1 442-4685

#### Term of data processing:

14 days from collection of your data.

#### Legal grounds for data processing:

Your consent that you gave to processing your data for one or more specific purpose.

### **Regular mail**

#### Date processed:

Ágnes Vörös, info@integraleuropeanconference.com, (+36) 1 442-4685

#### Term of data processing:

30 days from collection of your data.

#### Legal grounds for data processing:

Your consent that you gave to processing your data for one or more specific purpose.

# Contact via e-mail

### Date processed:

Ágnes Vörös, info@integraleuropeanconference.com

### Term of data processing:

30 days from collection of your data.

### Legal grounds for data processing:

Your consent that you gave to processing your data for one or more specific purpose.

# **Direct personal contact**

### Data processed:

Ágnes Vörös, info@integraleuropeanconference.com, (+36) 1 442-4685, 1024 Budapest, Lövőház u. 24. V. emelet V/2.

#### Term of data processing:

30 days from collection of your data.

#### Legal grounds for data processing:

Your consent that you gave to processing your data for one or more specific purpose.

# Additional data processing

Should the Processor intend to conduct additional data processing, it shall give you an advance notice on the substantial terms of such processing (legal grounds and framework and purpose of data processing, affected data, term of processing).

Please be aware that if applicable law so provides, the Processor is under an oblitgation to provide information to the relevant authorities upon their request. The Processor keeps record of such data transmission in accordance with Article 15 paragraphs (2) and (3) of the Information Law (including the recipient authority, the data forwarded, legal basis and time of such data transmission). The Processor shall give you information on the contents of such data transmission upon your request, unless such provision of information is prohibited by the law.

# Use of contractors and their activities in relation to data processing

# Storage of personal data

Name of contractor: Ágnes Vörös

E-mail address: info@integraleuropeanconference.com

Registered seat: 1121 Budapest, Ördögszikla út 7., Hungary

The Contractor is responsible for storage or personal data pursuant to a contract with the Processor. Personal data shall not be disclosed to the Contractor.

# Sending newsletters

Name of operator of newsletter distributing system: Mailchimp; The Rocket Science Group

**Registered seat:** The Rocket Science Group, LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA

E-mail address: info@mailchomp.com

Pursuant to a contract with the Processor, the Contractor shall assist in sending newsletters. The Contractor processes name and e-mail address of the data subject to the extent necessary for delivering newsletters and shall delete such data without delay upon request of the data subject.

# Accounting

Name of Contractor: CONTIREX Kft.

Registered seat of Contractor: 1026 Budapest, Nagyajtai u. 4. B building

Pursuant to a contract with the Processor, the Contractor shall enter accounting documents into the books of the Processor. The Contractor processes name and address of the data subject to the extent necessary for keeping accounting records, for the period prescribed by Article 169 paragraph (2) of the Accounting Law and shall delete such data immediately thereafter.

# Invoicing

Name of Contractor: Integral World Foundation / Ágnes Vörös

Registered seat of Contractor: 1121 Budapest, Ördögszikla út 7. Hungary

Telephone: +36302253767

E-mail address: info@integraleuropeanconference.com

Pursuant to a contract with the Processor, the Contractor shall keep records of accounting documents. The Contractor shall process name and address of the data subject to the extent necessary for keeping such accounting records, for the period prescribed by Article 169 paragraph (2) of the Accounting Law and shall delete such data immediately thereafter.

### Your rights in relation to the processing of your data

For the time period of processing of your data, you have the following rights pursuant to the GDPR:

- withdrawal of consent
- access to personal data and information in relation to data processing
- correction
- restriction on processing
- deletion
- objection
- data portability

Should you wish to exercise any of the above rights, that would reuire your identification and your communication with the Processor. For identification you will have to provide personal data (however, identification shall be based on data that are already processed by the Processor) and your complaint will be available on the Processor's e-mail account for the period indicated in this Privacy Statement in relation to complaints. If you were a purchaser of our product and request identification for complaint handling, please provide, in relation to the name of the purchaser and the date of the order and in addition, in relation to https://integraleuropeanconference.com/, the ID of your order. With such data we can identify you as our customer.

The Processor shall respond to any data process complaints within 30 days the latest.

#### Withdrawal of consent

You may withdraw your consent to data processing at any time, when we will delete all requested data from our systems. If a purchase has already been completed, we may not delete invoicing data due to accounting regulations, and if you have any dues to us, we still may process your data despite your withdrawal of consent, based on our legitimate interest to collect debts.

#### Access to personal data

You may request the Processor to confirm whether your personal data are processed and if so, you have the right:

- to get access to the processed data, and
- to receive information from the Processor on the following:
  - purposes of data processing;
  - o categories of your personal data processed by us;
  - information on third parties or categories of third parties to whom the Processor has disclosed or will disclose your personal data;
  - the planned length of time of keeping your personal data or, if a specific period cannot be stated, the criteria applied to determine such term;
  - your right to request from the Processor correction or deletion of your data, restriction on processing, and, if processing is based on legitimate interest, objection to processing of such personal data;
  - o your right to lodge a complaint to the relevant authority;
  - o source of the collected data if were not collected from you;
  - use, if any, of automatic decision making (including without limitation profiling), the logic involved and the likely significance and consequences on you of such processing.

The purpose of your right is verification of and control over lawfulness of data processing, therefore, in case of your repeated request for information, the Processor may request reasonable refund of its expenses for such provision of information.

The Processor shall, after identifying you, grant access to your personal data by sending the processed personal data and related information via e-mail. Should you have registered on our website, you will be able to see and check your personal data after logging in your user account.

Please specify in your request whether you want access to your personal data or information on data processing.

#### Correction

You may request the Processor correct, without delay, any inaccurate personal data.

#### Restriction on processing

You may request the Processor to restrict procession of your data on any of the following conditions:

- you contest accuracy of your personal data, in this case restriction applies for the period reasonably necessary for the Processor's verification of the accuracy of personal data; if accuracy can immediately be verified, no restriction will take place;
- the processing of data is unlawful but you, for any reason, object to the deletion of the data (for example, due to their importance for enforcement of claims), therefore you request restriction on the use of the data in lieu of their deletion;
- the Processor no longer needs personal data for the original purpose but you still need them for filing any legal claims or enforcement or protection of your rights;

• you objected against the data processing, but legitimate interest of the Processor may sufficient legal grounds for the processing; in this case data processing will be restricted until it is established whether such legitimate interests should prevail over your justification.

In case of restriction on data processing, affected personal data may be processed (with the exception of storage) only based on consent of the data subject, or for the purpose of filing claims or enforcement or protection of rights, or the protection of rights third parties (individual or corporate), or in the public interest of the EU or any of its Member States.

The Processor shall notify you at least 3 business days in advance of the removal of restrictions on data processing.

### Deletion – right to be forgotten

You may request that the Processor delete without unreasonable delay your personal data for any of the following reasons:

- personal data are no longer needed for the purpose of their original collection or other processing by the Processor;
- you have withdrawn your consent and there is no other legal grounds for the data processing;
- you object to the data processing on the basis of legitimate interests and there is no prevailing legitimate interest for such processing;
- it has been established, pursuant to your complaint, that your personal data were processed unlawfully;
- personal data must be deleted in order to comply with legal obligations prescribed by the law of the EU or any Member State thereof.

If the Processor, for any lawful reason, disclosed your personal data and, for any of the above reasons, it must delete such data, the Processor shall – taking into consideration available technology and the costs of the actions to be taken – take reasonably expectable steps (including technological measures) to inform third party processors processing your data that you requested the deletion of any links referring to the relevant personal data and any copy or replication of such personal data.

No deletion can be made if data processing is necessary:

- for exercising the rights to freedom of speech and to information;
- for compliance with obligations prescribed by EU or Member State law on data processing applicable to the Processor (such as data processing in invoicing where the invoice must be kept pursuant to the law), or in the public interest, or for implementation of tasks within the scope of public authority granted for the Processor;
- for filing and enforcement of legal claims or protection of rights (e.g. you have undischarged obligations towards the Processor, or a consumer claim on data processing in process).

### Objection

You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data on frounds of our legitimate interests. In such case Processor shall no longer process your personal data unless the Processor demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

### **Data portability**

In of automated data processing or such processing is based on your consent, you shall have the right to receive the personal data, which you provided to the Processor, in a structured, commonly used and machine-readable format and the Processor shall provide you with such data in an "xml", "JSON" or "csv" format. You shall also have the right to have your personal data transmitted directly by the Processor to another processor or controller, where technically feasible.

#### Automatic decision making

You have the right to get out of the scope of any decision (including profiling) based on exclusively automatic data processing, if such automatic decision would have legal consequences on you or would affect you in a similarly significant manner. In such cases the Processor must take appropriate measures for the protection of the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention from the Processor, to express its views and to file objection against the relevant decision.

The above shall not apply if the decision:

- is necessary for the conclusion or completion of a contract between you and the Processor;
- is based on such EU or Member State law relevant to data processing, which provides for
- appropriate measures in the protection of your rights, freedoms and legitimate interests; oris based on your express consent.

# **Registration with the Data Protection Register**

Pursuant to the provisions of the Information Law, the Processor had to register certain of its data processings with the Data Protection Register. Such obligation to register was terminated as of 25 May 2018.

### Data security measures

The Processor hereby represents that it has taken appropriate security measures in order to protect your personal data from unauthorized access, change, transmission, disclosure, deletion or destruction, accidental loss or damage, and inaccessibility due to changes in applied technologies.

Subject to its organizational and technological possibilities, the Processor shall strive to procure that its Contractors also take appropriate data protection measures when processing your personal data.

# Remedies

If, to your judgment, the Processor violated a provision of law regarding data processing, or the Processor failed to entertain some of your request, you may initiate an investigation process by the National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság or NAIH; mailing address: 1530 Budapest, POB: 5, Hungary; e-mail: ugyfelszolgalat@naih.hu) in order to terminate such presumed unlawful data processing.

In addition, in case of violation of laws on data processing or the Processor's failure to entertain some of your request, you may file a civil law claim with the court.

# Amendment of this Privacy Policy Statement

The Processor hereby reserves the right to amend this Privacy Policy Statement to the extent it does not affect the purpose and legal grounds of its data processing. You accept such amendments by using the website after the effective date of such amendments.

Should the Processor intend to process your already collected data for purposes other than such data were originally collected for, the Processor shall give prior notice to you on the new purpose of processing your data and the following information:

- term of storage of your personal data or, if such term cannot be defined in advance, the factors determining such term;
- your right to request from the Processor access to your personal data, their correction, deletion or restriction on their processing, and, in case data processing is based on our legitimate interest, to object to the processing of personal data, as well as your right to request, in case of data processing based on consent or contract, to ensure data portability;
- if data processing is based on your consent, your right to withdraw such consent any time;
- your right to file claims/complaints to the supervisory authority;
- whether the provision of your personal data is based on requirements of law or contractual obligation, and if such data provision is a precondition to conclusion of a contract, as well as whether you are under the obligation to provide your personal data, and the potential consequences of your failure to provide such data;
- if there is any automatized decision making applied, including without limitation profiling, and if so, the logic applied in such decision making as well as comprehensive information as to the importance and consequences on you of such data processing;

Any such data processing may commence only upon the above notice and, in case its based on your consent, such consent must also be obtained.

This document includes all relevant information on data processing in relation to our website, in accordance with the GDPR and the Information Law.