

## PRIVACY POLICY

On the handling of personal data acquired in relation to the operation of “syntax.click” (hereinafter: „**Website**”)

In accordance with the 2016/679 statute (hereinafter: „**Statute**” of European Parliament and Council adopted on 27th April 2016 in relation to the protections regarding the handling and transmission of personal data of natural persons, as well as the repeal of statute 95/46/EK, we hereby fulfill our obligation per article 13 to inform the Website’s visitors (hereinafter: „**User(s)**”) of our policy regarding the handling of their personal data as per follows.

### (1) **The Website’s operator and the handler of personal data** (hereinafter: „**Data Handler**”):

Dot Creative Ltd  
Postal address: 1123 Budapest, Nagyenyed utca 16.,  
Phone: +36 30 245 0919;  
e-mail: [kassitzky@dotcreative.hu](mailto:kassitzky@dotcreative.hu)

. The **Data Handler** does not have an appointed data protection officer. In relation to any issues regarding data protection, the managing director of the company Attila Kassitzky (address: HU1123 Budapest, Nagyenyed utca 16.; phone: +36 30 245 0919; e-mail: [kassitzky@dotcreative.hu](mailto:kassitzky@dotcreative.hu)) can be contacted.

### (2) **Personal data generated in relation to the operation of the Website – Description, objective and scope of data handling**

#### (i) **Registration**

The **Website** makes registration available with the intent of being able to log in to access and customize the **User**’s own profile and the services provided by the **Website**. Registration is not required in order to browse the **Website**.

The following data are handled in relation to registration:

- surname,
- given name,
- e-mail address,
- password.

#### (ii) **Cookies**

Parts of the website use small size files (hereinafter: **Cookie(s)**) to identify the **Users**. During visits to the **Website** and in order to use certain features, the **Data Handler** asks the **User** for permission to store **Cookies** on their device and to access them in their capacity as **Data Handler**.

Types of data collected by cookies;

- Operating system and type of device;
- Cookie data (eg.: used to distinguish devices and browsers);
- the IP address from which the **User** accessed the **Website**;

What are cookies and how are they handled by the **Data Handler**?

**Cookies** are small files, which are stored on the **User**’s device by the **Website** in relation to its use. **Cookies** are saved in and accessed through the **Users**’ browser

General purpose of **Cookies**:

- collect information about **Users** and their devices;
- store **Users**’ custom setting;
- make use of the **Website** easier;
- help provide a better user experience.

To provide personalized service **Cookies** are stored in the **User's** device, which can be accessed on repeat visits. By accessing data stored **Cookies** in the **User's** browser, the **Data Handler** can match **Users** to their previous visits in relation to visits carried out on the **Data Handler's Website**. For further information regarding cookies and their uses, **Users** can consult the „Help” section of their browsers.

#### Online measurement

It is important for both the operators of websites and advertisers to obtain information about how many users visited their sites and contacted the ads placed by them. It is also important for them to know how many page views were made, how many times users clicked on their ads, et cetera. The **Data Handler** uses Google Inc.'s Google Analytics service on the **Website**. Google Analytics uses cookies to help analyze the traffic on the given site. Data obtained from Google Analytics' cookies (including the **User's** IP address) are stored on Google Inc.'s own servers. Google Inc.'s „Privacy Policy” can be reached at <http://www.google.hu/intl/hu/policies/privacy/>. **Cookies** can be deleted at any time from the **Users** device, and it is also possible to reject the storage of **Cookies** on devices entirely by using the relevant browser settings. Identification of 3rd party cookies can be done by checking the domain associated with the cookie. However rejecting web beacons and click trackers is not possible. Most commonly used browsers (Google Chrome, Mozilla Firefox, Edge, Explorer, Opera, Safari, etc.) accept **Cookies** by default, however it is up to the individual **User** if they want to modify these settings to reject new **Cookies** or delete **Cookies** stored previously.

Guides in turning off **Cookie** acceptance:

- Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldal-tarolnak-szami?redirectlocale=hu&redirectslug=Sütik+kezelése>
- Internet Explorer: <https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>
- Safari: [https://support.apple.com/kb/PH21411?viewlocale=en\\_US&locale=en\\_US](https://support.apple.com/kb/PH21411?viewlocale=en_US&locale=en_US)
- Edge: <https://support.microsoft.com/hu-hu/help/10607/microsoft-edge-view-delete-browser-history>
- Opera: <http://help.opera.com/Windows/10.20/hu/cookies.html>

#### (iii) *Newsletter*

On the **Website** the **User** has the option to subscribe to an e-mail newsletter containing marketing information and ads. The **Data Handler** provides the option to unsubscribe from the newsletter on each installment, in an easy to find and use position. Unsubscribing from the newsletter also revokes consent to the Privacy Policy, in which case the **Data Handler** deletes all personal data in regards to the **User** and sends no further newsletter. Personal data provided by the **User** for the purpose of the newsletter is not used in relation to any other activity by the **Data Handler**.

The following types of data are handled in relation to newsletter subscriptions:

- e-mail address.

### (3) *Legal basis and objective of Data Handling*

#### Data provided during registration

The legal basis of data handling in this case is the consent of the user, given after adequate information is provided prior to registration. The objective of data handling by the **Data Handler** as the operator of the **Website** is to provide access to services, to identify and differentiate **Users**

#### Data accessed in relation to use of **Cookies**

The legal basis for data handling is the rightful interest of the **Data Handler** to reach the objectives listed as follows, as per article 6. paragraph (1) section f.) of **Statute**. The objective of the **Data Handler** is to provide access to the service of the **Website**, to personalize content, to show and measure advertisements, and to improve upon system performance.

Data handled in relation to newsletter subscriptions

The legal basis for data handling is the rightful interest of the **Data Handler** to provide up to date information about its services offered on the **Website** to **Users**, as per article 6. paragraph (1) section f.) of **Statute**.

**(4) Data handling period**

In case of registration, from the moment of registration until the deletion of registration.

In case of personal data contained in relation to cookies, depending on the settings of the given cookie, up to 120 days after the cookie was stored or accessed. For exact dates, the browsers' cookie settings can be consulted in accordance with chapter (2).

In case of newsletters, from the moment of subscription until the unsubscription of the **User**.

**(5) Data processing and forwarding**

The **Data Handler** does not employ 3rd parties to process the data generated in relation to the services provided on the **Website**. However, the **Data Handler** is authorized and required to forward any and all available legally stored data to authorities, when the law requires them to do so. The **Data Handler** is not liable for the consequences of such instances of data transfer.

**(6) Information regarding the rights of Users in relation to data handling:**

All **Users**, as rightful owners of their personal data handled by the **Data Handler** have the right to request access to copies of or correction to the data stored; or – per the cases and exception described in article 17. of the **Statute** – request the deletion, restricted handling or object to the handling of personal data. In case the legal basis of data handling was the given consent of the **User**, the **User** is entitled to revoke that consent at any time. Revocation of consent does not constitute the data handling prior to revocation as unlawful.

**(7) The right to file complaint with a supervisory authority:**

**Users** may file a complaint regarding the handling of their personal data with the relevant government agency:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36/1-391-1400

e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu),

Website: [www.naih.hu](http://www.naih.hu)

Budapest, 4th September 2020.

Dot Creative Ltd