

PRIVACY POLICY

1. COMPANY INFORMATION

1.1. Details of the Company¹

Company name: MoneyMate Korlátolt Felelősségű Társaság
Company registration number: 01-09-380397
Registry Court: Company Registry Court of Budapest-Capital Regional Court

Registered seat: 1173 Budapest, Búbosbanka utca 6. Building B.
Tax number: 29135132-2-42
EU VAT number: HU29135132

Phone number: [■]
E-mail address: dataprivacy@moneymateapp.com.
Website: www.moneymateapp.com

2. INTRODUCTION

2.1. The Company, as the operator of the website www.moneymateapp.com (the **Website**) and the operator of the MoneyMate computer application (the **Application**), pays special attention to compliance with the data protection provisions related to the management of the data of the data subjects. In this regard, the Company pays special attention to compliance with the requirements set out in the relevant domestic and international legislation, including, but not limited to, Act CXII of 2011 on the right to information self-determination and freedom of information. (**Infotv.**), Act CVIII of 2001 on certain issues of electronic commerce services and information society services. (**Ektv.**), as well as Regulation 2016/679 of the European Parliament and of the Council. (**GDPR**).

2.2. The terms used in this Privacy Statement have the following meanings:

- a) *personal data*: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.
- b) *data processing*: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- c) *controller*: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such data processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- d) *data processor*: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

¹The Company reserves the right to change the data without changing these terms. These data are always governed by the current company data kept by the competent court or authority.

- e) *recipient*: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- f) *data subject*: in data processing, the identified or identifiable natural person whose data is processed in the case of data processing on the basis of this Privacy Policy is the natural person who uses or visits the Website or the Application (the **User**).
- g) *data subject's consent*: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- h) *personal data breach*: 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.

3. CONTROLLER

MoneyMate Korlátolt Felelősségű Társaság
Registered seat: 1173 Budapest, Búbosbanka utca 6. Building B.
Company registration number: 01-09-380397
Mailing address: 1173 Budapest, Búbosbanka utca 6. Building B.
Tax number: 29135132-2-42
E-mail: dataprivacy@moneymateapp.com
Website: www.moneymateapp.com

4. DATA PROCESSORS

- 4.1. The Company uses a data processor to ensure the continuous and proper operation of the Website and the Application, as well as to perform other activities closely related to the provision of the services provided by it.
- 4.2. The Company's IT service providers are: (i) Tárhely.Eu Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1144 Budapest, Ormánság utca 4. X. em. 241.), which carries out data processing in the field of hosting services related to the Website; (ii) Magyar Hosting Korlátolt Felelősségű Társaság (registered seat: 1132 Budapest, Victor Hugo utca 18-22.), which performs data processing in the field of hosting services related to the Application, and Patrik Gábor Vida sole proprietor (registered seat: 1145 Budapest, Szugló utca 66. 6/602.), who, in connection with the provision of IT services related to the operation of the Application.
- 4.3. In connection with the fulfillment of payment obligations relating to the services provided by the Company, the Company hereby informs the User that the payment obligations will be fulfilled for Google Play Services and the Apple App Store in accordance with their contractual terms and data management policies. Data management information for these providers is available at <https://policies.google.com/privacy?hl=en-US> és <https://www.apple.com/legal/privacy/en-ww/>.

5. PRINCIPLES OF DATA PROCESSING

- 5.1. The Company processes personal data lawfully and fairly, in accordance with the principle of transparency, based on the legislation in force at any time.
- 5.2. The Company processes the personal data that has come to its knowledge in accordance with the consent of the relevant User – only to the extent necessary in accordance with the data processing purposes set out in this Privacy Policy and the relevant legal regulations.
- 5.3. The Company informs the User that the User is responsible for the correctness and accuracy of the personal data provided by the User. If the User does not provide his/her personal data to the Company, he/she is obliged to obtain the consent of the data subject whose personal data has been transferred to the Company and to prove this to the Company. The Company does not verify the personal data provided to it. When providing the e-mail address, the User is also responsible for ensuring that only he/she uses the service from the provided e-mail address.
- 5.4. The Company undertakes not to transfer the personal data that has come to its knowledge to third parties, with the exception of the data processors indicated in this Privacy Policy, excluding any exceptions indicated in this Privacy Policy and the provisions of law or official regulations.
- 5.5. The Company is obliged to ensure the security of the personal data of the data subjects and, within this framework, to take all necessary measures to ensure a high level of protection of personal data.

6. RANGE OF DATA PROCESSED

- 6.1. During registration in the Application and use of the Application, the User is obliged to provide the Company with the following personal data: e-mail address, username and password used for the Application account, ID suitable for Push messaging, username of other persons using the Application. When using the Website, it is not necessary to provide personal data, however, it is possible to send an e-mail message on the interface indicated on the Website, in which case the User must provide his/her e-mail address and name to the Company.
- 6.2. In addition to the personal data contained in Section 6.1 of this Privacy Policy, the Company registers the photos and texts uploaded by the User during the use of the Application.

7. PURPOSE OF DATA PROCESSING

- 7.1. The personal data provided by the User is processed by the Company for the purposes specified in this chapter.
- 7.2. **To register for, log in to, or use the Application:**
 - a) Purpose of data processing: User registration is required to use the Application. As part of the registration, the User creates his/her own user account, to which (s)he can assign additional sub-accounts, which are managed within his/her own user account. The purpose of data processing is to record the User's data, grant access and keep in touch for the purpose of using the services offered by the Company in case of registration, while in case of login to identify and verify the User, as well as to use the services provided by the Company.
 - b) The scope of data processed in connection with the data processing for the purpose specified in this section: e-mail address, username and password used for the Application account, ID suitable for Push messaging, username of other persons using the Application, photos and texts possibly uploaded by the User.

- c) Legal basis of data management: the User's consent.
- d) Duration of data processing: data management lasts until the User's consent is revoked. The User may withdraw his/her consent, at which time (s)he may terminate his/her registered user account at any time free of charge. If the User deletes his/her user account, his/her personal data will be deleted without delay, together with the personal data managed within all assigned accounts.

7.3. Identification of the User, contact with him/her and possible enforcement of claims:

- a) The purpose of data processing is to identify and contact the User, as well as to resolve any legal disputes between the User and the data processors entrusted by the User and the Company and the User.
- b) The scope of data processed in connection with the data processing for the purpose specified in this section: e-mail address, username and password used for the Application account, ID suitable for Push messaging, username of other persons using the Application, photos and texts possibly uploaded by the User.
- c) The legal basis of data processing: the contact arising between the Company and the User in the course of the performance of the contract, as well as the resolution of possible legal disputes and the enforcement of claims.
- d) Duration of data processing: until the date of termination of the contract concluded between the Company and the User (which is realized by deleting the User's account).

7.4. Other data processing

- a) The purpose of data processing: in the case specified by law or on the basis of the request of the bodies and persons authorized by law (e.g. court, investigative authority), the Company is obliged to comply with the request for the disclosure of personal data contained in the request. In this context, the Company shall comply with the contents of the request, provided that the exact scope of the data has been indicated and the purpose of the request has been verified, to the extent strictly necessary for the realization of the purpose of the request.
- b) The scope of data processed in connection with the data processing for the purpose specified in this section: any personal data provided by the User.
- c) The legal basis of data processing: the fulfillment of the obligations imposed on the Company by the bodies and persons specified by law or authorized by law.
- d) Duration of data processing: until the purpose of data processing is achieved.

8. LEGAL BASIS FOR DATA PROCESSING

- 8.1. The legal bases of the data processing performed by the Company and the data processors are indicated in Chapter 7 of this Privacy Policy. The consent shall cover all data processing activities carried out for the same purpose or purposes. If the data processing serves several purposes at the same time, the consent must be given for all data processing purposes.
- 8.2. In addition to the provisions of Section 8.1, the legal basis for data processing is the User's voluntary, explicit consent to the processing of his or her personal data based on appropriate information. The User gives his or her consent to the Company during the conclusion of the contract.

- 8.3. Data transfer to the data processors commissioned by the Company may be performed without the separate consent of the User. In the event that the scope of the referred data processors changes, the Company will notify the User of the change by publishing the amendment to this Privacy Policy on the Website.

9. DURATION OF DATA PROCESSING

- 9.1. The Company retains the personal data provided by the User until the User withdraws his or her consent or the User requests their deletion. During the period of data management, the personal data will be stored only in a way that allows the identification of the User only for the time necessary for the realization of the data processing purposes set out above. The Company informs the User that the personal data stored by the Company is not accessed by unauthorized persons.
- 9.2. In addition to the provisions set out in Section 9.1, the data processing periods related to each data processing purpose are set out in Chapter 7 of this Privacy Policy.
- 9.3. Data automatically recorded in connection with the operation of the Website and the Application will be stored for a reasonable period of time to ensure the operation of the Website. The Company declares that the data recorded in this way may not be combined with other personal data, except in cases made mandatory by law.

10. SCOPE OF PERSONS ACCESSING THE DATA

- 10.1. The Company informs the User that the personal data processed by it - in addition to the data processors entrusted by the Company - are accessed by the employees of the Company who perform direct activities as a result of the contract concluded by the User.
- 10.2. The data processors entrusted by the Company handle the personal data transmitted to them by the Company themselves. In this context, the Company declares that, to the best of its knowledge, the data processing performed by the authorized data processors complies with the applicable data protection regulations, however, it does not take responsibility for the data processing performed by them.

11. RIGHTS OF THE USER, DATA SUBJECT CONCERNED

- 11.1. **Right to information:** as part of this, the User may request information on data processing concerning his/her personal data. The information may relate to (i) the purposes of the data processing, (ii) the categories of personal data, (iii) the recipients of any transfer, (iv) the purpose of the transfer, (v) the duration of the storage, (vi) the rectification, erasure or processing of the data (vii) the right to lodge a complaint with the supervisory authority, (viii) information on data sources, (ix) the fact of automated decision-making, including profiling. The Company is obliged to provide the requested information to the User within a maximum of 30 days from the submission of the request.
- 11.2. **Right to access:** as part of this, the User is entitled to contact the Company at any time as to whether data processing concerning his/her personal data is in progress and, if so, he/she is entitled to request access to the data concerning him/her at any time.
- 11.3. **Right to rectification:** within this framework, the User is entitled to have any inaccurately recorded personal data corrected by the Company without delay, and if necessary, the Company may supplement the scope of the processed personal data based on the data to be provided by the User.

- 11.4. **Right to cancellation:** within this framework, the User may request the deletion of his or her personal data processed, unless the need for data processing is required by law or the relevant authority, and if the data processing is necessary for the submission, enforcement or protection of legal claims. If the Company refuses the cancellation request submitted by the User, it shall inform the User of the reasons. The Company draws the User's attention to the fact that in case of fulfillment of the deletion request, it is not possible to recover the data deleted. In the event of a request for deletion, the Company will inform the data processors as necessary and invite them to delete the requested personal data.
- 11.5. **Right to restriction of data processing:** in this context, the User may request a restriction on data processing, which the Company is obliged to comply with in the event of any of the conditions listed below:
- a) the data subject disputes the accuracy of the personal data, in which case the restriction shall cover the period of verification of the accuracy of the personal data provided;
 - b) in the case of data unlawfully handled by the Company or its data processors, if the User does not agree with the deletion of the data and requests a restriction on the use instead of the deletion;
 - c) the data processing of the Company no longer exists due to the necessity, however, the User - in order to submit, validate and protect his/her legal claim - also requests their further processing;
 - d) in the event of a conflict between the Company's data processing rights and the legitimate reasons of the data subject, if the User has objected to the data processing, the restriction shall extend for the duration of the necessary investigation.
- 11.6. **Right to data portability:** in this context, the User is entitled to receive the personal data concerning him/her made available to the Company in a structured, widely used, machine-readable format and to transfer them to another data controller of his/her choice.
- 11.7. **Right to object:** in this context, the User has the right to object to the processing of his/her personal data if the data processing is (i) necessary for the performance of a task in the public interest or in making use of a public authority granted to the Company; or (ii) for the direct acquisition of business, including profiling, necessary to enforce the legitimate interests of the Company or a third party; and (iii) for scientific and historical research or statistical purposes. In the event of objection, the Company may not further process personal data, unless it is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the User or which are related to the submission, enforcement or protection of legal claims.
- 11.8. **Automated individual decision making, including profiling:** in this context, the User is entitled not to be subject to a decision based solely on automated data processing, including profiling, which would have legal effect on him or her or would significantly affect him or her.
- 11.9. **Informing the data subject about a personal data breach:** as part of this, the Company will inform the data subject of the data protection incident without delay, if the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons.
- 11.10. **Right to complain to the Supervisory Authority:** in this context, the data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data concerning him or her violates the provisions of the GDPR or other laws or regulations.

- 11.11. **Right to an effective judicial remedy against a supervisory authority:** in this context, the User is entitled to an effective judicial remedy against a legally binding decision of the supervisory authority applying to the User, or if the supervisory authority does not deal with the complaint or does not inform the User within three months about the procedural developments or the outcome of the complaint.
- 11.12. **Right to an effective judicial remedy against the controller or data processor:** in this context, the User is entitled to an effective judicial remedy if, in his/her opinion, his/her rights under this Regulation have been violated as a result of improper handling of his/her personal data.
- 11.13. If necessary, an employee of the Company will provide assistance to validate the rights specified in this chapter at dataprivacy@moneymateapp.com. The Company considers a request for information sent in a letter to be authentic or lawful if the User can be clearly identified on the basis of the request sent. A request for information sent by e-mail is considered authentic by the Company only if it is sent from the e-mail address previously provided by the User. If the Company has reasonable doubts as to the identity of the natural person submitting the application, it may request the provision of additional information necessary to confirm the identity of the data subject. The Company may charge a fee in the cases covered by the GDPR for requesting information or a copy.
- 11.14. The Company will respond to requests received by it as soon as possible, but within a maximum of 30 days. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by a further 60 days. The Company shall inform the User about the extension of the deadline, indicating the reasons for the delay, within 30 days from the receipt of the request.
- 11.15. The Company informs the User that in the case specified in Section 11.10 of this Privacy Policy, User may contact the National Data Protection and Freedom of Information Authority (registered seat: 1055 Budapest, Falk Miksa utca 9-11 .; telephone number: + 36-1-391-1400; e-mail address: ugyfelszolgalat@naih.hu; website: www.naih.hu) with his or her claim.
- 11.16. The Company informs the User that in the case specified in Section 11.11 and 11.12 of this Privacy Policy, the proceedings fall within the jurisdiction of the tribunal. Proceedings may also be instituted before a court of competent jurisdiction according to the place of residence or stay of the data subject concerned.

12. INFORMATION ABOUT COOKIES USED BY THE COMPANY

- 12.1. The Company hereby informs the User that the so-called uses "cookies". The Website uses information packages (cookies) created by the web server on the User's device using the browser, if the User consents to this at the beginning of the visit. These information packages collect information, memorize the User's individual settings, prevent data loss, so they are used and generally facilitate the use of the Website by Users.
- 12.2. The cookies used by the Company fall into two categories. One category includes cookies that are deleted after closing the browser used by the User. Cookies belonging to the other category remain on the device used by the User and help the Company to recognize the User's browser the next time the Website is visited.
- 12.3. The Company draws the User's attention to the fact that it is not mandatory to allow the acceptance of cookies. The Company also informs the User that the cookies used by the Website are not in themselves suitable for identifying the User. The settings for cookies can be individually controlled by the User in the settings of the browser used by him. In this context, the Company informs the User that without the use of cookies the use of the Website cannot be considered complete.

- 12.4. The Company records the public IP address used by the User when accessing the Website and the type of browser used by the User in connection with the service provided through the Website, taking into account the Company's legitimate interest and lawful provision of the service (e.g. illegal use or illegal content) without the separate consent of the User.
- 12.5. The cookies used by the Company record and manage the following data in relation to the User and the device used by him for browsing: IP Address, Device IDs, Pages Viewed, Type of Browser Used, Browsing Information, Operating System Used, Internet Service Provider, Timestamp, User Location, Reference URL, Features Used on the Website or Activities Performed there.
- 12.6. The Company uses the following cookies:
- a) *Essential cookies*: Essential cookies help make the Website usable by enabling basic features such as navigating the Website and accessing secure areas of the Website. The Website cannot function properly without these cookies.
 - b) *Statistical cookies*: Through the collection and reporting of data in an anonymous form, statistical cookies help the Company understand how visitors interact with the Website.
 - c) *Marketing cookies*: Marketing cookies are used to track the activity of visitors to the Website. In this regard, the Company's goal is to publish relevant ads for Users and encourage them to become active, which makes the Website even more valuable to content publishers and third-party advertisers.
- 12.7. The Company informs the User that detailed information about the cookie settings of widely used browsers is available at the following links:
- a) Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>;
 - b) Mozilla Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>;
 - c) Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>;
 - d) Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>;
 - e) Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>;
 - f) Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>;
 - g) Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>;
 - h) Safari: <https://support.apple.com/hu-hu/HT201265>;
 - i) Opera: <http://help.opera.com/Windows/10.20/hu/cookies.html>.

13. OTHER PROVISIONS

- 13.1. If the Company transfers the operation or utilization of the Website or the Application in whole or in part to a third party, the personal data processed by the Company may be transferred to such third party for further processing without requesting specific consent, provided that User cannot be placed at a disadvantage compared to the data processing and data security rules set out in this Privacy Policy valid at all times. In the case of data transfer pursuant to this section, the Company shall provide the User with an opportunity to object to the data transfer prior to the data transfer. In case of protest, it is not possible to transfer the data of the given User according to this section.
- 13.2. The Company will indemnify the damage caused to others by the illegal handling of the data of the data subject or by violating the data security requirements. In the event of a breach of the data subject's right to privacy, the data subject may claim damages. The Company is also liable to the data subject for the damage caused by the data processor. The Company is released from liability if the damage was caused by an unavoidable cause outside the scope of data processing. The Company will not reimburse the damage and no damages can be claimed to the extent that the damage or the impairment caused by the violation of privacy was caused by the intentional or grossly negligent conduct of the injured party or data subject.
- 13.3. The Company reserves the right to amend this Privacy Policy at any time by unilateral decision. Following the amendment of the Data Management Information, the User must be informed accordingly. This can happen especially if the scope of services, data processors and external service providers expands, or if it is made mandatory by law. A change in data processing must not mean a different way of handling personal data.
- 13.4. This Privacy Policy and the Terms and Conditions applied by the Company are complementary documents, which are to be read together and which can be viewed on the Website.
- 13.5. The contents of this Privacy Policy will take effect on April 16, 2021. The Company provides information on data processing not listed in this Policy when the data is entered.

MoneyMate Korlátolt Felelősségű Társaság
repr.: Dávid Pap managing director