

## PRIVACY POLICY

The personal data you provide is processed by:

### **Digital Thinkers Ltd.**

Headquarters: 1097 Budapest, Vaskapu u. 10-14. C.110.

Tax number: 27032071-2-43

Company registration number: 01 09 345771

Registration authority: Court of Registration of the Metropolitan Court of Justice

Please read carefully this Privacy Policy (hereinafter referred to as the "**Notice**"), in which we describe our practices regarding the processing of your personal data in accordance with the General Data Protection Regulation (GDPR, i.e. Regulation 2016/679 of the European Parliament and of the Council). With regard to the data processing described in this information, **Digital Thinkers Kft.** the Data Controller (hereinafter referred to as the **Data Controller**) and the owner of the website (<https://digitalthinkers.com/>) of Digital Thinkers Kft. This information applies to persons using the services of the Data Controller as consumers (**you**). It describes how the Data Controller collects, uses and shares your personal data with third parties in certain cases, and provides information about your "data subject" rights related to data processing.

The Data Controller is committed to protecting the personal data and privacy of individuals visiting the website. This information and statement is primarily about the confidentiality and protection of customers' personal data via the Internet, but it also includes visitors to the site. We summarize what data about you can be collected and used by the Data Controller. The data will not be passed on to unauthorized persons and will be used in the form specified in this prospectus.

In individual cases, the purpose of data processing may be modified in the contracts, which is carried out under the conditions set out in the given contract.

The information sheet provides important information about the protection of users' personal data and their rights in this regard. If the user does not accept these terms and conditions, he has the right to suspend the use of the website and to stop browsing without providing personal data.

### **Information related to data processing**

In case of any comments, questions or complaints concerning our data protection procedures, we are available at the following contact details: **Digital Thinkers Kft., 1097 Budapest, Vaskapu u. 10-14. C.110.** or [info@digitalthinkers.hu](mailto:info@digitalthinkers.hu) e-mail address.

<b>Controller</b>	<b>Responsibilities</b>
<p data-bbox="293 371 560 405"><b>Digital Thinkers Ltd.,</b></p> <p data-bbox="225 443 635 506">1097 Budapest, Vaskapu u. 10-14. C.110.</p>	<p data-bbox="699 371 839 405">All activities</p>

According to your choice, you have the right to access our website without providing your personal data, however, it is essential to accept the cookie policy for browsing and, in case of contacting us through the website, to approve the privacy statement. Personal data means any information relating, directly or indirectly, to a natural person who can be identified by means of an identification number or by reference to the data relating thereto. In the event that the data controller collects your personal data, the data collection will be transparent and confidential.

Your personal data is information that can be used to identify you personally, such as: first name, first name, nationality, telephone number, postal address, e-mail address. After voluntary provision, the Data Controller collects your personal data when browsing the site, indicating in each case the data that must necessarily be provided to achieve the purpose. If you do not wish to provide this data, you will not be able to access certain functions and services of the website. The collection of optional data serves to understand the needs of users and to improve the website and services.

The Data Controller shall take all measures to ensure that the personal data processed by it are accurate and up-to-date.

**The following personal data are processed:**

- Surname, first name, company name and contact name (in case of company)
- Registered office address (in case of company), residential address, mailing address
- E-mail address
- Telephone number
- System information (IP address, system version, resolution, statistics about the pages viewed on the website, browsing habits, behavior patterns)
- Previous professional experience and other personal and professional preferences

**Duration of data processing:**

- With regard to direct marketing consents until the user's consent is withdrawn
- For profile data, 4 years from the last login

## Conditions for data transfer

The Data Controller may, to the extent necessary, transfer the data processed by it to persons and companies designated by it operating in the following areas:

- Data processing
- Legal representation
- Bodies authorised by law to deal with disputes
- Delivery
- Accounting
- Receivables management
- Marketing
- Invoicing

## Companies and persons carrying out data processing or processing data

**Digital Thinkers Kft. (Data Controller)** carries out data processing on its website. In addition to the Data Controller, other companies are also involved in the processing and storage of the data of contractual customers.

## Which companies are related to data processing?

In the course of the Data Controller's activities, the companies involved in data processing:

- **DigitalOcean, LLC.** : 101 Avenue of the Americas 10th Floor New York, NY 10013 United States, [www.digitalocean.com](http://www.digitalocean.com)
- **Google Inc.** : 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, [additional contact details](#), mail system, cloud data and file storage, online document management, and related services: Google Drive, Google Docs, Google Search Console, Google Analytics, Google AdSense, Google AdWords, YouTube, Blogger, Chrome browser support - [Google Privacy](#) and [Privacy Policy](#).
- **Facebook Ireland Ltd.** : 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland, support for other products and functions offered by Facebook, Instagram, Messenger and Facebook - [data management policy](#) and [contact details](#) of the Data Protection Officer.
- **Twitter International Company**: One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 IRELAND, use of products and features offered by Twitter - [privacy policy](#) and [gtc](#).
- In special cases, the contract may include additional data processing persons or companies.

## **Data subject rights and enforcement**

If you do not wish your personal data to be used to communicate commercial offers, you have the right to object without giving any reason. You must send your request for deletion to the Data Controller in writing, by e-mail or postal mail, to the [info@digitalthinkers.hu](mailto:info@digitalthinkers.hu) e-mail address.

## **Protection of minors and their personal data with limited legal capacity**

**Digital Thinkers Ltd.** its website and the content of its appearances are mostly not intended for minors under the age of 13. We do not process or collect personal information from children under the age of 13 without verifiable parental or guardian consent. Parents or guardians may request the release or deletion of data about the child. If the age becomes apparent to the Data Controller during the course of data processing and data processing, the data may be used for the purpose of obtaining parental consent.

The consent of a legal representative is required for the declaration of a minor who is incapacitated and has limited legal capacity, except for parts of the service aimed at registration, which occur en masse in everyday life and do not require special consideration.

## **Managing cookies**

The website of Digital Thinkers Kft. uses cookies in order to operate the website, to facilitate its use, to track the activity on the website and to display relevant offers.

Please read the document carefully and use the services of the website only if you agree with all its points and agree to be bound by them. Please note that this policy only applies to the handling of cookies on the respective website.

## **What is a Cookie?**

A cookie is a small piece of data that internet services store in your browser. It is an essential technology for the operation of the online service, which provides an efficient and modern user experience and is supported by all browsers today.

## **How is a Cookie created?**

First, the client machine sends a request in the direction of the server. The server then generates a unique identifier and stores it in its own database, and then sends the cookie back to the client with all the information. The information cookie thus recovered is stored on the client machine.

## **How is Cookie used?**

When the client machine reconnects with the server, it is already pairing the previously created and stored cookie. The server compares the contents of the cookie it receives and the cookie it stores. This allows you to easily identify e.g. the logged-in registered user. Without it, for example, it would not be possible to log in to a website.

The website uses cookies for the following purposes:

- to improve the website,
- when navigating the user's website or using the site's functions, thus ensuring a smooth user experience,
- to collect information about how the user uses our website - by assessing which parts of our website he visits or uses most, so that we can find out how to provide an even better user experience when he visits our site again,
- to place targeted advertisements on other websites,
- to distinguish and identify browser users,
- to track website activity in order to better send you messages about relevant offers that are of interest to or of interest to the user.

## **What types of cookies are used by the website and what does the website use?**

### Basic functionality cookies

These cookies ensure the proper functioning of the website, facilitate its use and collect information about its use without identifying users. This includes, for example, the storage of calculator usage values, the status of accepting cookie management, remembering login methods and data, the status of website notification messages and the reduced-functionality Google Analytics code.

Please note that without the use of these cookies, we cannot guarantee you a comfortable use of our website.

### Cookies for statistical purposes

For the purpose of developing the website and improving the experiences provided to users, the website also uses cookies that allow the Data Controller to collect information about how users use the website. These cookies cannot identify the user personally, they collect information such as which page our visitor viewed, which part of the website the user clicked on, how many pages he visited, how long the viewing time of each session was, what were the possible error messages.

### Performance cookies

Such performance cookies are also cookies from Google Analytics. For more information about Google Analytics cookies, please click here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Performance cookies are also cookies from Google Optimize. For more information about Google Optimize cookies, please visit <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

### Targeting and advertising cookies

The purpose of these cookies is to display advertisements on websites that are more interesting or relevant to the user. These cookies cannot personally identify the user without the user's consent, they collect information such as which page the website visitor viewed, which part of the website the user clicked on, how many pages he visited, all in order to get to know the content of interest to the user.

If the user has given his or her consent, the Data Controller may use the information collected during the monitoring of the use of the website in combination with the user's personal data, in order to better adapt the marketing communication of Digital Thinkers Kft. to the needs of the user and to draw attention to personalized offers for users as much as possible.

### **On our website, we use advertising cookies from the following providers:**

#### **Google Adwords**

Detailed information about the service is available via the following link:

<https://www.google.com/intl/hu/policies/privacy>

#### **Facebook**

Detailed information about the service is available at the following link:

<https://www.facebook.com/help/cookies/>

#### **Google Analytics**

Detailed information about the service is available at the following link:

<https://www.google.com/intl/hu/policies/privacy>

### **How can you check and turn off cookies?**

All modern browsers allow you to change your cookie settings. Most browsers automatically accept cookies by default, but these settings can usually be changed so that your browser can prevent automatic acceptance and offer you the choice of whether to allow cookies each time. Please note that since the purpose of cookies is to facilitate or enable the usability and processes of the website, preventing or deleting the use of cookies may prevent you from using the functions of the website to their full extent, or that the website will work differently in your browser than planned.

## Expressions used:

- **Data processor:** a natural or legal person, public authority, agency or any other body that processes personal data on behalf of the controller.
- **Processing:** any operation or set of operations performed on personal data or sets of data, whether or not by automated means, such as: collection, recording, organisation, structuring, storage, transformation, alteration, retrieval, consultation, use, disclosure, transmission, dissemination, otherwise making available, alignment, combination, restriction, erasure, destruction.
- **Data transfer:** making the personal data processed by the Data Controller available to third parties.
- **Personal data breach:** a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- **Identifiable natural person:** a natural person who can be identified, directly or indirectly, by reference to one or more factors specific to the identity of an identifier, such as: name, identification number, location data, online identifier, physical, physiological, genetic, mental, economic, cultural or social identity.
- **Recipient:** a natural or legal person, public authority, agency or any other body to which the personal data are disclosed, regardless of whether it is a third party or not.
- **Consent of the user:** a freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject, by a statement or by a clear affirmative action, indicates his or her consent to the processing of personal data concerning him or her.
- **Data subject:** a natural person identified or identifiable on the basis of any information.
- **Users:** visitors of the websites operated by the Data Controller and accessible on the <http://www.digitalthinkers.hu> website and other addresses specified therein.
- **Third party:** a natural or legal person, public authority, agency or body other than the data subject, controller, processor or persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- **Authority:** National Authority for Data Protection and Freedom of Information (seat: 1125 Budapest, Szilágyi Erzsébet fasor 22 /c., phone: 06-1 391-1400, fax: 06-1 391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [naih.hu](http://naih.hu))
- **Partner/Customer:** a natural person who concludes a contract with the Data Controller for the sale of a product or the provision of a service on a non-website.
- **Registration:** recording the personal data of the website user, with which he creates a user account.
- **Personal data:** any information relating to the data subject.
- **Service:** services provided by the Data Controller to its Customers, Partners and Users on the website or otherwise.