

## PRIVACY STATEMENT

in force from 21 September 2021

### 1. Introduction

HeroBot Ltd. hereby informs you of its practices regarding the processing of personal data related to the use of the website [www.herobot.eu](http://www.herobot.eu) (hereinafter referred to as the **Website**) and the services provided on the Website, of the organizational and technical measures taken to protect the data, as well as of your rights in relation to data processing and the means of enforcing your rights.

This notice and the processing of your personal data will be carried out in accordance with the applicable laws, in particular:

- Regulation (EU) No 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation) (General Data Protection Regulation, hereinafter "the **Regulation**");
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: **Ektv.**);
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services;
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities.

### 2. Basic concepts and interpretations of personal data

**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 a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**processing:** any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection,

recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**controller:** the natural or legal person, public authority, agency or any 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 the processing are determined by Union or Member State law, the controller or the specific criteria for the controller's designation may also be determined by Union or Member State law;

**processor:** a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

**data breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

### 3. The data controller

The data controller is HeroBot Kft. (hereinafter referred to as: Data Controller, company registration number: 10-09-037527, tax number: 26787369-2-10, registered office: 3011 Heréd, Rákóczi Ferenc street 135., representative: Olivér Krizsán, Managing Director, telephone: +36 20 508 6898, e-mail address: hivatalos@herobot.eu).

### 4. Principles of data management

The processing of personal data must be lawful, fair and transparent for the data subject.

Personal data may only be collected for specific, explicit and legitimate purposes. The data processed must be adequate, relevant and limited to what is necessary for the purposes for which they are processed.

The data processed must be accurate and, where necessary, up to date. All reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay.

Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data are processed.

Personal data must be processed in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, by using appropriate technical or organisational measures.

## 5. Data processing:

### a) Data management in the contact us menu on [www.herobot.eu](http://www.herobot.eu)

|                              |   |
|------------------------------|---|
| Scope of the data processed: | name, e-mail address  |
| Who is affected              | Those interested in the services of the Data Controller through the website   |
| Legal basis for processing:  | Voluntary consent of the data subject<br>(Article 6(1)(a) GDPR)   |
| Purpose of the processing:   | inform the data subject about the service of interest to him or her   |
| Duration of processing:      | 1 year from the date of the communication to the data subject, after which the data will be automatically deleted unless the data subject has contacted the Data Controller again. In the event of a subsequent request, the Controller shall process the personal data for a maximum of 1 year from the date of the communication. |
| Data transmission:           | none  |
| Data processor:              | none  |
| How to provide data:         | voluntary   |

### b) HeroBot Ltd. data management of LinkedIn community page

(joint data management with the operator of the LinkedIn site - LinkedIn Corporation (2029 Stierlin Court Mountain View, CA 94043, USA). In Europe, LinkedIn Ireland (Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland) is responsible for data protection. The LinkedIn site operates within the framework of the LinkedIn Privacy Policy. The LinkedIn Privacy Policy can be found here: <https://www.linkedin.com/legal/privacy-policy>)

|                              |   |
|------------------------------|---|
| Scope of the data processed: | name, email address, public profile picture, other data shared through the LinkedIn community site                          |
| Who is affected              | users who like or follow the Controller's LinkedIn company page or send messages to the Controller through the page         |
| Legal basis for processing:  | Voluntary consent of the data subject<br>(Article 6(1)(a) GDPR)   |
| Purpose of the processing:   | promote the Data Controller, provide information about articles written by the Data Controller and the services it provides |
| Duration of processing:      | according to the rules available on the relevant Community site   |
| Data transmission:           | none  |
| Data processor:              | none  |
| How to provide data:         | voluntary   |

c) Processing the data of job applicants via the email address [info@herobot.eu](mailto:info@herobot.eu)

|                              |  |
|------------------------------|--|
| Scope of the data processed: | name, address, telephone number, e-mail address<br>+ all the data provided by the applicant in his/her CV  |
| Legal basis for processing:  | Article 6(1)(b) GDPR   |
| Purpose of the processing    | Contact between HeroBot Kft. and the candidate for an interview.   |
| Duration of processing:      | 3 (three) months after the end of the application process.<br>or<br>1 (one) year after the end of the application process, at the applicant's specific request in writing. |
| Data transmission:           | -  |
| How to provide data:         | voluntary  |

## d) Processing of data of persons contacted for direct marketing purposes

|                              |   |
|------------------------------|---|
| Scope of the data processed: | name, e-mail address  |
| Legal basis for processing:  | Article 6(1)(f) GDPR  |
| Purpose of the processing    | Contacting HeroBot Kft to establish a business relationship |
| Duration of processing:      | 3 (three) months after the data were collected.             |
| Data transmission:           | -   |
| How to provide data:         | voluntary   |

## e) Cookie management on [www.herobot.eu](http://www.herobot.eu)

|                              |   |
|------------------------------|---|
| Scope of the data processed: | Some cookies may store the visitor's IP address or part of it, browser type, website usage data (time of visit, pages visited, session duration, number of clicks).   |
| Who is affected              | Persons visiting the Website  |
| Legal basis for processing:  | <ul style="list-style-type: none"><li>• In the case of cookies that are technically necessary for the operation of the Website, for the use of the services and functions provided on the Website: § 13/A of the Act, Article 6 (1) (b) of the Regulation.</li><li>• For cookies that serve convenience or marketing functions, or to analyse the use of the website or improve its performance: the data subject's voluntary consent (Article 6(1)(a) of the Regulation).</li></ul>    |
| Purpose of the processing:   | <p>Cookies are placed on the website, if you return a cookie, the server has the possibility to link the current request to previous ones. These can be used to collect visitor data and anonymous statistics.</p> <p>The following cookies may be used on the site:</p> <ul style="list-style-type: none"><li>• <u>Session cookie:</u> these cookies are temporarily activated while you browse. In other words, from the moment the user opens the browser window until the</li></ul> |

moment it closes. Once the browser is closed, all session cookies are deleted.

- Persistent (analytical/performance) cookies: these cookies allow us to recognise and count the number of visitors to the website and to understand how they navigate the website while using it. These cookies are used to improve the functioning of the website (for example, to allow us to help our visitors find what they are looking for). They are activated each time the user visits the website.
- Own (functional) cookies: these allow us to recognise you (or your computer or browser) when you visit our website again. This allows us to personalise the content we offer you, to greet you by name and to remember your preferences (for example, your language or region of choice).
- Third party cookie: when a user visits a page, another party (e.g. YouTube) activates the cookie through the website.

The list of cookies actually used by the Website is set out in the Cookie Policy attached as Annex 1 to this Privacy Notice.

Duration of processing: until the end of the session (it is terminated when the user leaves the website), or the user has the right to disable or delete the cookie.

Data transmission: none

Data processor: none

How to provide data: voluntary

The Data Subjects acknowledge and accept that the Data Controller's server automatically registers the IP address of its users, the type of operating system and browser software they use and some other information. The Data Controller uses this information only in aggregated and processed (aggregated) form, in order to correct

possible errors in its services, to improve their quality and for statistical purposes. The data will not be linked in any way by the Data Controller to other data provided by Users

## 6. Other data processing:

Any processing not listed in this Privacy Notice will be disclosed at the time the data is collected. Courts, prosecutors, investigating authorities, law enforcement authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, or other bodies authorised by law may contact the controller to provide information, data, or documents. The Data Controller shall disclose to the public authorities - provided that the public authority has indicated the precise purpose and scope of the data - personal data only to the extent and to the extent strictly necessary for the purpose of the request.

### Data processors:

We only transfer personal data to third parties for processing purposes. The processor may process the personal data that comes to his/her knowledge only in accordance with the provisions of the controller, may not process the personal data for his/her own purposes, and shall store and retain the personal data in accordance with the provisions of the controller.

1. Name: google  
Headquarters: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA,  
Data processing task: handling emails, messages
2. Name: Dotroll Ltd.  
Head office: 1148 Budapest, Fogarasi út 3-5.  
Data processing task: server operation, hosting service

The Data Controller reserves the right to engage an additional data processor, the identity of which shall be notified by the Data Controller at the latest at the start of the processing.

### Data transmission:

The Data Controller informs the data subjects that, when using certain functions of the Website, their personal data may be disclosed to Partners who have a contractual relationship with the Data Controller.

## 7. Who has access to the data (recipients):

7.1. The personal data may be accessed by authorised employees of the Data Controller, its contractors who need access to personal data in order to perform their duties, as well as by the Data Controller's senior management and deputy.

## 8. How Personal Data is stored, security of processing

The Data Controller's computer systems and other data storage locations on the servers of its data processor, Dotroll Kft. Hungary and on the servers of Google as a mail service provider.

The Data Controller shall select and operate the IT tools used for the processing of personal data in the course of providing the service in such a way that the processed data is accessible to those authorised to access it, its authenticity and authenticity are ensured, its integrity is verifiable and it is protected against unauthorised access.

The Data Controller shall take appropriate measures to protect the data against, in particular, unauthorised access, alteration, disclosure, deletion or destruction, accidental destruction, damage or loss, and inaccessibility resulting from changes in the technology used.

The Data Controller shall ensure, in relation to the data it processes, by appropriate technical means, that the stored data cannot be directly linked and attributed to the data subject, except where permitted by law.

The Data Controller shall ensure the security of data processing by means of technical, organisational and organisational measures that provide a level of protection appropriate to the risks associated with the processing, taking into account the state of the art.

The Data Controller shall retain during the processing:

1. data confidentiality: protects data from unauthorised access;
2. data integrity: ensuring the accuracy and completeness of the information and the processing method;



3. availability of data: ensuring that when an authorised user needs it, he or she can access the information he or she requires and that the necessary means are available.

## 9. Data subjects' rights and remedies:

The data subject may request information on the processing of his or her personal data, and may request the rectification, erasure or withdrawal of his or her personal data, except for mandatory processing, and exercise his or her right to data portability and objection in the manner indicated when the data were collected or by contacting the controller at the above contact details.

### Right to information:

The Data Controller shall take appropriate measures to provide data subjects with all the information referred to in Articles 13 and 14 of the GDPR and each of the disclosures referred to in Article 34 of Articles 15 to 22 of the GDPR concerning the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language.

The right to obtain information can be exercised in writing, using the contact details set out in Chapter II of this notice. Upon request, the data subject may also be provided with information orally, after verification of his or her identity.

### The right of access of the data subject:

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the following information:

- a) the purposes of the processing, the legal basis for the processing;
- b) the categories of personal data concerned;
- c) the categories of recipients to whom or with whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- d) the intended duration of the storage of the personal data;
- e) the right to rectification, erasure or restriction of processing, the right to object and the right to data portability;
- f) the right to lodge a complaint with a supervisory authority;
- g) information about the data source;
- h) the fact of automated decision-making, including profiling, as well as the logic used and the available information on the significance of such processing and its likely consequences for the data subject.

In the event of a transfer of personal data to a third country or an international organisation, the data subject is entitled to be informed of the appropriate safeguards for the transfer.

The Data Controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller shall charge a reasonable fee based on the administrative costs. At the request of the data subject, the controller shall provide the information in electronic form. The information shall be provided within a maximum of one month from the date of the request.

#### Right of rectification:

The data subject may request the correction of inaccurate information concerning him or her processed by the Data Controller and the completion of incomplete data.

#### Right to erasure:

The data subject shall have the right, upon his or her request, to obtain the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- personal data are collected in connection with the provision of information society services.

The erasure of data cannot be initiated if the processing is necessary:

- to exercise the right to freedom of expression and information;
- for the purposes of complying with an obligation under Union or Member State law to which the controller is subject to which the processing of personal data is

subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

- for archival, scientific or historical research purposes, or for statistical purposes in the public interest in the field of public health; or
- to bring, enforce or defend legal claims.

Within 5 (five) working days of receipt of the data subject's request for erasure, it shall erase the data relating to the data subject from its records. The Data Controller shall receive written requests for erasure by e-mail to [hivatalos@herobot.eu](mailto:hivatalos@herobot.eu).

#### Right to restriction of processing:

At the request of the data subject, the Data Controller shall restrict processing if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies for a period of time which allows the accuracy of the personal data to be verified;
- the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

Where processing is restricted, personal data, other than storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

The Controller shall inform the data subject in advance of the lifting of the restriction on processing.

## Right to data retention:

The data subject has the right to receive personal data relating to him or her which he or she has provided to the controller in a structured, commonly used, machine-readable format and to transmit these data to another controller.

## Right to object:

The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or necessary for the purposes of the legitimate interests pursued by the controller or by a third party, or to processing for direct marketing purposes, including profiling based on those provisions. In the event of an objection, the controller shall no longer process the personal data, unless it is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

## Automated decision-making on individual cases, including profiling:

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right shall not apply where the processing is

- necessary for the conclusion or performance of a contract between the data subject and the controller;
- is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- is based on the explicit consent of the data subject.

## Right of withdrawal:

The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

## Rules of Procedure:

Without undue delay and in any event within one month of receipt of the request, the controller shall inform the data subject of the action taken in response to the request pursuant to Articles 15 to 22 of the GDPR. Where necessary, taking into account the

complexity of the request and the number of requests, this period may be extended by a further two months.

The data controller shall inform the data subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. Where the data subject has made the request by electronic means, the information shall be provided by electronic means, unless the data subject requests otherwise.

If the controller fails to act on the data subject's request, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

The Data Controller shall provide the requested information and data free of charge. Where the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may, taking into account the administrative costs of providing the information or information requested or of taking the action requested, charge a reasonable fee or refuse to act on the request.

The controller may inform all recipients to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing that it has carried out, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of the recipients.

The data controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject has made the request by electronic means, the information shall be provided in electronic format unless the data subject requests otherwise.

#### Compensation and damages:

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for damage caused by processing only if it has failed to comply with the obligations expressly imposed on processors by law or if it has disregarded or acted contrary to lawful instructions from the controller.

Where more than one controller or more than one processor, or both controller and processor, are involved in the same processing and are liable for the damage caused by the processing, each controller or processor is jointly and severally liable for the total damage.

The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

#### Right to apply to the courts:

The data subject may take the controller to court if his or her rights are infringed. The court shall rule on the case out of turn.

#### Data protection authority procedure:

Legal remedies and complaints can be lodged with the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Head office: 1055 Budapest, Falk Miksa u. 9-11.

Address for correspondence: 1363 Budapest, Pf. 9.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

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

Website: <http://www.naih.hu>

## 10. Other provisions

Data Subjects acknowledge that the Website contains a number of links to other service providers' sites. The Data Controller is not responsible for the data and information protection practices of these service providers.

## 11. Amendments to the Privacy Policy

The Data Controller reserves the right to unilaterally amend this Privacy Policy, subject to appropriate publication of the amended policy.

## Annex 1.

### WWW.HEROBOT.EU COOKIE POLICY

The operator of the site is HeroBot Kft. (hereinafter referred to as the "Data Controller", company registration number: 10-09-037527, tax number: 26787369-2-10, registered office: 3011 Heréd, Rákóczi Ferenc út 135., represented by Olivér Krizsán, Managing Director, telephone: +36 20 508 6898, e-mail: hivatalos@herobot.eu).

This Cookie Policy applies to the [www.herobot.eu](http://www.herobot.eu) website operated by HeroBot Ltd. This Policy forms part of the Privacy Policy available at [www.herobot.eu](http://www.herobot.eu) (the "Website"), which can be found at [https://herobot.eu/Adatkezelesi\\_tajekoztato.pdf](https://herobot.eu/Adatkezelesi_tajekoztato.pdf).

By using the Website, you consent to the use of cookies in accordance with this Cookie Policy. If you do not agree to this use of cookies, please set your browser accordingly or do not use the Website. If you disable the cookies we use, this may affect your experience of using the Website.

#### What are cookies?

Cookies are files or pieces of information that are stored on a user's computer (or other internet-enabled devices such as smartphones or tablets) when they visit a website. A cookie usually includes the name of the website from which the cookie came, the "lifetime" of the cookie (i.e. how long it stays on your device), and its value, which is usually a randomly generated unique number.

#### What do we use cookies for?

We use cookies to make the Website easier to use and more personalised. Cookies may also be used to help speed up future activities and to improve your user experience when using the Website. They can also be used to generate anonymous, aggregated statistics to help us better understand how people use the Website and to help us improve its structure and content. We cannot identify you personally from this information.

## Types of cookies

- Session cookie: these cookies are temporarily activated while you browse. In other words, from the moment the user opens the browser window until the moment it closes. Once the browser is closed, all session cookies are deleted.
- Persistent (analytical/performance) cookies: these cookies allow us to recognise and count the number of visitors to the website and to understand how they navigate the website while using it. These cookies are used to improve the functioning of the website (for example, to allow us to help our visitors find what they are looking for). They are activated each time the user visits the website.
- Own (functional) cookies: these allow us to recognise you (or your computer or browser) when you visit our website again. This allows us to personalise the content we offer you, to greet you by name and to remember your preferences (for example, your language or region of choice).
- Third party cookie: when a user visits a page, another party (e.g. YouTube) activates the cookie through the website.

## What cookies do we use?

### Session cookies:

*\_utmc*      Used for visitor statistics (anonymous) only during the time of use

### My (functional) cookie:

*cookielawinfo-checkbox-necessary*

The cookie is used by the GDPR Cookie Consent plugin to store the user's response to the "Necessary" cookie, it will be deleted after 11 months, 29 days, 23 hours, 59 minutes

*cookielawinfo-checkbox-non-necessary*

The cookie is used by the GDPR Cookie Consent plugin to store the user's response to the "Necessary" cookie, it will be deleted after 11 months, 29 days, 23 hours, 59 minutes



## Permanent (analytical/performance) cookie:

|                                 |  |
|---------------------------------|--|
| <i>_utma</i>                    | Used for visitor statistics (anonymous), will be deleted after 2 years.  |
| <i>_utmt</i>                    | Used for visitor statistics (anonymous), deleted after 10.               |
| <i>_utmb</i>                    | Used for visitor statistics (anonymous), deleted after 30.               |
| <i>_utmz</i>                    | Used for visitor statistics (anonymous), will be deleted after 6 months. |
| <i>_utmav</i>                   | Used for visitor statistics (anonymous), deleted after 2 years.          |
| <i>_ga</i>                      | Visitor statistics (anonymous), will be deleted after 2 years            |
| <i>_gat</i>                     | Visitor statistics (anonymous), deleted after 1 minute                   |
| <i>_gid</i>                     | Visitor statistics (anonymous), deleted after 24 hours                   |
| <i>AMP_TOKEN</i>                | Visitor statistics (anonymous), kept from 30 seconds to 1 year           |
| <i>_gac_&lt;property-id&gt;</i> | Visitor statistics (anonymous), deleted after 90 days                    |

## Third Party Cookies:

### *YSC*

The cookie is used by Youtube to track the viewing data of embedded Youtube videos during the time you use the site

### *VISITOR\_INFO\_LIVE*

The cookie is used by Youtube to track information about embedded Youtube videos, will be deleted after 5 months, 26 days, 23 hours, 59 minutes

### *test\_cookie*

The cookie is used by doubleclick.net to determine whether the visitor's browser supports cookies, it will be deleted after 14 minutes

### *IDE*

The cookie is used by Google DoubleClick. It stores information about how a visitor uses the website and any other advertising before they visit the website. It is used to show visitors ads that are relevant to them based on their profile, and is deleted after 6 months

## How can I check or delete cookies?

Most internet browsers are initially set to accept cookies without any user intervention and/or indication. You can change these settings to block cookies or request a warning when websites you visit set cookies on your device. There are several ways to manage cookies. Please refer to your browser information to learn more about your browser settings and how to change them.

Attention! If you turn off the cookies we use, it may affect your experience.