

1. Definitions

1.1. *personal data*: data related to the data subject, in particular the name, identifying sign, and the knowledge of one or more physical, physiological, mental, economic, cultural or social identities of the data subject, as well as the deduction from the data

1.2. *contribution*: voluntary and decisive expression of the will of the person concerned, based on appropriate information and by which he gives his / her unambiguous consent to the handling of his / her personal data, covering all or part of operations;

1.3. *protest*: the statement of the person concerned with which he or she is objecting to the handling of his / her personal data and requesting the termination of data processing and the processing of the data processed;

1.4. *data controller*: means a natural or legal person or an organization that does not have legal personality who either independently or with others determines the purpose of data management, makes and executes decisions on data management (including equipment used) or executes it with the data processor;

1.5. *data management*: irrespective of the method used, any operation or all of the operations, such as collecting, capturing, capturing, systematizing, storing, modifying, using, querying, transmitting, publishing, aligning or linking, blocking, deleting and destroying any of the operations, or to prevent further use of the data, to take photographs, sound or images, and to record the physical characteristics (eg finger or palm print, DNA sample, iris image) suitable for identifying the person;

1.6. *transfer of data*: making the data available to a specific third party;

1.7. *data deletion*: making data unrecognizable in such a way that their recovery is no longer possible;

1.8. *data destruction*: complete physical destruction of data, containing media;

1.9. *data processing*: performing technical tasks related to data management operations, irrespective of the method and device used to implement the operations and the location of the application, provided that the technical task is carried out on the data;

1:10. *data processor*: means a natural or legal person or an organization without legal personality who, on the basis of a contract, including a contract concluded under a provision of the law, processes data;

1:11. *third party*: a natural or legal person or a non-legal entity which is not the same as the data subject, the data controller or the data processor;

2. Purpose of the Data Protection and Privacy Policy

The purpose of the Data Protection and Privacy Policy is to define the legitimate framework of data management by Silvergard Ltd and Myadmate Ltd. as Data Manager, to ensure the validation of the constitutional principles of data protection and the right of informational self-determination, and to facilitate compliance with data security requirements. The data controller agrees to the content of this legal notice. Commits you to ensure that all data management related to your business complies with the requirements of this Code and the applicable national legislation and the legal acts of the European Union. Data Privacy Guidelines for data handlers data are permanently available at <https://360hrtools.com/media/privacy.pdf> address. The Data Controller reserves the right to change this information at any time. In this case, its audience will be notified in due time of any changes. If you have any questions about this announcement, please write to us and our colleague will answer your question. In order to protect the privacy of our dedicated customers and users, the Data Controller considers it

important to respect the user's right to informational self-determination. The Data Handler manages the personal data in confidence and takes all security, technical and organizational measures that guarantee the security of the data. The Data Manager describes your data management practices below.

3. Contact information of the Data Managers

If you would contact our Company, you can contact the data administrator at the following contact details:

Name: **Silvergard Ltd**

Address: 41 Skylines Business Village (Jsa Accountants), Limeharbour, London, United Kingdom, E14 9TS

Register number: 10491479

Court of registration: Company House UK

Tax Reference No(UTR):29186-23697

Tel: +36 (30) 9744184

Email: info@silvergard.eu

Name: **Myadmate Ltd.**

Address: 41 Skylines Business Village (Jsa Accountants), Limeharbour, London, United Kingdom, E14 9TS

Register number: 07493121

Court of registration: Company House UK

Tax Reference No(UTR): 73298-13393

Tel: +36(30)971 3309

Email: info@myadmate.com

3.1 Data Protection Officer MyAdmate Ltd

Name: Gábor Mag

Tel: +36 (30) 971 3309

3.2 Data Protection Officer Silvergard Ltd

Name: Tamás Képesi

Tel: +36 (30) 974 4184

The Data Manager deletes all emails received, including personal data, after a maximum of 3 years from the date of disclosure.

4. Contact details of the Data Processor

Name: **Myadmate Ltd.**

Address: 41 Skylines Business Village (Jsa Accountants), Limeharbour, London, United Kingdom, E14 9TS

Register number: 07493121

Court of registration: Company House UK

Tax Reference No(UTR): 73298-13393

Tel: +36(30)971 3309

Email: info@myadmate.com

5. The scope of the personal data handled

5.1 The scope of personal data

Personal data generated during registration:
Live email address
User name

Personal data generated during use of this site
The user's IP address

5.2 Technical data

The Data Controller selects and manages the IT tools used to manage personal data in the provision of the service so that the data treated:

- (available) to those entitled to it;
- credibility and authentication (credibility of data management);
- its integrity can be verified (data integrity);
- unauthorized access (confidentiality of data).

The Data Controller protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction and against accidental destruction. The Data Controller provides technical, organizational and organizational measures to protect the security of data management, providing a level of protection that meets the risks associated with data management. The Data Controller maintains confidentiality during data management:

- it protects the information so that it can only access the person who is entitled to it;
- integrity: it protects the accuracy and completeness of the information and processing method;
- Availability: Ensure that when the eligible user needs it, you really have access to the information you need and have the tools available to you.

5.3 Cookies

5.3.1 The task of cookies

- collecting information about visitors and their assets;
- note the custom settings for visitors that may be used (e.g. when using online transactions, so you do not have to type them again);
- facilitate the use of the website;
- quality user experience.

For a tailor-made service, the user's computer has a small data packet, place a cookie and read it later. If your browser returns a previously saved cookie, the cookie operator can link the user's current visit with the past, but only for their own content.

5.3.2 Mandatory session cookies

These cookies are designed to allow visitors to browse their site completely and smoothly, use its features and the services available there. The duration of this type of cookie expires until the session (browsing) ends, and by closing the browser, this type of cookies is automatically deleted from the computer or other device used for browsing.

5.3.3 Third party cookies (analytics)

We use Google Analytics as a third-party cookie on our site. Google Analytics uses statistics for collecting information about how visitors use this website. The data is used to improve the site's development and user experience. These cookies will remain on your browser or other browser on your computer or on your browser, or until your visitor cancels them.

5.6 Data related to the newsletter

Possibility of subscribing to and unsubscribing to the newsletter:

The Data Controller ensures that in any newsflow process, the customer will still be able to opt-out. In the posted newsletter, the data administrator also allows you to unsubscribe from the newsletter and to delete personal data.

6. The intended use and retention time of the data processed

Data management name	Purpose of use	Legal basis	Retention time
Name	Identification, contact	Based on voluntary contributions	Participation in the last active project - 3 years after the closing date
Email address	Identification, contact	Based on voluntary contributions	Participation in the last active project - 3 years after the closing date
IP address	The protection of the IT system and the security of the website	It is necessary to enforce the legitimate interests of the Company	90 days after project closure

7. The purpose, method and legal basis of data management

7.1 General Data Management Policies

The data management of the data manager's activities is based on a voluntary contribution, legal authorization or legitimate interest. In the case of data management based on voluntary contributions, the data subjects may withdraw their consent at any time during the processing of data. In some cases, the management, storage, and transmission of a given set of data are mandatory by law, which is specifically notified to our customers, and in some cases we collect personal information for the sake of system security, which will automatically be deleted after a certain period of time. We are kindly advising the Data Handler to inform the data providers that, if they do not provide their personal data, the data supplier is obliged to obtain the consent of the person concerned. The data management principles are in line with existing data protection legislation, in particular:

- 2011 CXII. Act on Information Self-Destruction and Freedom of Information (Infotv.);
- Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (general data protection regulation, GDPR);
- Act V of 2013 - Civil Code (Civil Code); Act C of 2000 on Accounting (Accounting);
- LIII. Law on the Prevention and Control of Money Laundering and Terrorist Financing (Pmt.);
- 2013 CCXXXVII. Act on Credit Institutions and Financial Enterprises (Hpt.)

8. Physical storage locations of data

Your personal information (that is, the data that may be associated with your person) can be treated in the following way:

- Uploaded to your system by your company and with your consent
- in connection with maintaining the Internet connection with your computer, browser program, Internet address,
- the technical data about the visited pages will be automatically generated on our computer system, on the other hand, you may also provide us with your name, contact details or other information if you intend to contact us personally using this site.
- Technically recordable data during the system operation: the data of the relevant computer that is generated during the evaluation and which my.360hrtools.com records as an automatic result of the technical processes. Data that is automatically recorded will be logged automatically when entering or exiting, without the particular statement or action of the person concerned. This data can not be linked to other personal user data except in cases that are legally binding. Data is only available to the Data Technician's technical staff.

9. Data transmission, data retrieval, the circle of people familiar with the data

The Data Management System is also used by companies whose system allows data collection and processing. Each such actor enters into the Data Handler Data Handling Agreement in which the terms of this Privacy Statement are included. The basic data of the data management companies (data manager contacts and the circle of employees knowing data) is listed on the web site of the Data Manager. A contract with data controllers contains the obligation of confidentiality as described in the Privacy Statement.

10. Affected Rights and Opportunities for Enforcement

You may request the information concerned to handle your personal data and may request the rectification of your personal data or, with the exception of mandatory data, cancellation, revocation, discretion and right of protest as indicated in the record and the above mentioned contact details of the data controller.

10.1 Right to Information

The Data Controller shall take appropriate measures to ensure that all information relating to the processing of personal data, referred to in Articles 13 and 14 of the GDPR, and Article 34, in a concise, transparent, comprehensible and easily accessible manner, in a clear and unambiguous manner.

10.2 Right to access

The data subject is entitled to receive feedback from the data controller as to whether his or her personal data is being processed and, if such data is being processed, has access to personal data and the following information: the purpose of data management; the categories of personal data concerned; the categories of recipients or recipients with whom or which personal data will be communicated or disclosed, including in particular third-country addressees or international organizations; the intended duration of the storage of personal data; the restriction of rectification, deletion or data handling and the right of protest; the right to file a complaint addressed to the supervisory authority; data sources; the fact of automated decision making, including profiling, as well as the logic used and the understandable information on the significance of such data management and the likely consequences for the data subject. The data controller shall provide the information within a maximum of one month from the submission of the application.

10.3 Correction Right

The person concerned may request rectification of inaccurate personal data handled by the Data Controller and supplementation of incomplete data.

10.4 Right to Cancellation

In the event of any of the following reasons, the data subject has the right to delete the personal data relating to him upon request by Data Manager within 30 days:

- personal data is no longer needed for the purpose for which they have been collected or otherwise handled;
- the party concerned withdraws the consent of the data controller and does not have any other legal basis for data processing;
- the person concerned objects to data manipulation and has no prior legitimate reason for data handling; the personal data was unlawfully handled;
- the personal data should be deleted for the legal obligation provided for by the law applicable to the data controller in the Union or the Member States;
- the collection of personal data was made with the provision of information society services.

Deletion of data can not be initiated if data management is required: to exercise the right to freedom of expression and the right of access; the fulfillment of an obligation under EU or Member State law applicable to the data controller for the processing of personal data, or for the performance of a task carried out in the exercise of public authority exercised in the public interest or on the data controller; for the purpose of archiving, scientific and historical research or for statistical purposes in the public health field, in the public interest; or for the submission, validation or protection of legal claims.

10.4.1 Process of cancellation request

Sign in to your account and click "Delete account" in the profile section to initiate canceling your account. Please confirm your intention to cancel based on the instructions in the confirmation email.

10.5 Right to Restrict Data Management

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

- the person concerned disputes the accuracy of the personal data; in this case, the restriction concerns the period of time that allows the accuracy of personal data to be verified;
- data handling is illegal and the data subject is opposed to the deletion of the data and instead asks to limit their use;
- the data controller no longer needs personal data for data processing purposes but the data subject requires them to submit, enforce, or protect legal claims;
- the person concerned objected to data handling; in this case, the restriction applies to the duration of determining whether the data controller's legitimate reasons prevail over the legitimate grounds of the party concerned. If data processing is restricted, personal data may be handled only with the consent of the person concerned or the submission, enforcement or enforcement of legal claims or the protection of the rights of a natural or legal person, or in the public interest of the Union or of a Member State.

10.6 Right to media

The data subject shall have the right to receive the personal data that he or she has accessed to the data controller in a fragmented, widely used machine-readable format and transmit such data to another data controller.

10.6.1 Process of the application

Sign in to your account and click "Download Account Info" in the profile section to initiate downloading your data. Confirm your request for information based on the instructions received in the confirmation email and then download the ZIP archive file generated by the system.

10.7 Right to protest

The person concerned is entitled to object at any time to the processing of data necessary for the execution of a task performed in the public interest or in the exercise of a public authority exercised on the data controller for the purposes of his or her own personal situation or for the treatment of the legitimate interests of the data controller or a third party, including profiling based on those provisions too. In the event of a protest, the data controller may not process personal data unless it is justified by compelling reasons of lawfulness that prevail over the interests, rights and freedoms of the person concerned, or which relate to the submission, enforcement or defense of legal claims.

10.8 Automated decision-making in individual cases, including profiling

The data subject shall be entitled to exclude the scope of a decision based solely on automated data management, including profiling, which would have a bearing on him or would have a significant effect on him.

10.9 Right to Withdrawal

You have the right to withdraw your consent at any time, which will result in your account being deleted.

10.10 Right to Court

In case of breach of his or her rights, the data subject may turn to the court. The court proceeds out of court.

10.11 Privacy Policy Procedures

You can lodge a complaint with Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, UK Tel: 0303 123 1113 (local number) vagy 01625 545 745 Fax: 01625 524 510 Honlap: <https://ico.org.uk/> Email: privacyshield@ico.org.uk

11. Other provisions

Data management not listed in this information is provided when data is included. We inform our clients that information, dissemination, transfer of documents or other documents from other bodies, based on the authority of the court, the prosecutor, the investigating authority, the offense authority, the administrative authority, the National Data Protection and Information Authority, the National Bank of Hungary, to access the data controller. The Data Controller gives the authorities, if the authority indicates the exact purpose and scope of the data, only to the extent and to the extent that the personal data is required to achieve the purpose of the request.