

PRIVACY POLICY

The present Privacy Policy of W.UP Szolgáltató Ltd. (1027 Budapest, Ganz street 16, hereinafter referred to as W.UP) contains the information on the data management conducted as a controller by W.UP and on the rights of those concerned.

W.UP is committed to protect the personal data of its partners and its website's visitors and considers highly important that its customer's right to informational self-determination is respected.

The present Privacy Policy covers accordingly the data management conducted through the W.UP website (www.wup.digital, www.wup.hu), social networks and all forms of offline data management as well.

W.UP reserves the right to change the present Privacy Policy. All parties concerned will be informed regarding the changes through W.UP's website.

DEFINITIONS

Terms used in the present Privacy Policy are as follows:

1. data subject: an identified natural person or a – directly or indirectly – identifiable natural person based on personal data

2. personal data: data that can be attributed to a data subject – especially the name, any identification, and any knowledge regarding the data subject's one or more specific physical, physiological, mental, economic, cultural or social identity -, and the conclusions that can be drawn regarding the subject based on the data

3. special categories of data ("sensitive data"):

- Personal data regarding racial origin, nationality, political opinion or party affiliation, religious or other philosophical convictions, membership of any interest groups, sexual orientation or sexual life,
- Personal data regarding state of health, addictions and criminal personal data

4. consent: freely given specific, informed and explicit indication of the data subject's will by which the data subject unambiguously signifies agreement to personal data relating to them being processed;

5. opposition: the statement of the data subject, by which the data subject criticizes the range of his or her personal data that is processed or the manner in which it is processed and by which the data subject requests the cessation of data processing and the deletion of the data processed;

6. controller: a natural or legal person or an entity without legal personality which alone or jointly with others determines the purpose of the processing of personal data, makes and implements the decisions on data management (including the instrument used)

7. data management: any operation or set of operations which is performed upon personal data, regardless of the method used, such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, transmission, disclosure, coordination or combination, blocking, erasure and destruction and the prevention of the further use of the data, photo, sound or image recording and recording the data subject's physical characteristics which permit identification (such as fingerprints, palm prints, DNA samples and iris images);

8. data transmission: making the data available to a specified third party

9. disclosure of data: making the data available to anyone;

10. deletion of data: making the data unrecognizable in such way that restoration is no longer possible in any way

11. data marking: the allocation of identification marks to the data in order to make distinguishment possible;

12. blocking personal data: the allocation of identification marks to the data in order to limit its management permanently or for a definite period of time

13. data destruction: the complete physical destruction of the medium containing the data;

14. data processing: the performance of technical tasks related to data management operations, methods or means, regardless of the methods or instruments used to perform the operations or the location, provided that the technical tasks are performed on the data.

15. data processor: a natural or legal person or an entity without legal personality, who is processing the data under a contract – including contracts concluded under the provisions of the legislation

16. third country: any State which is not member of the EEA

17. Infotv.: Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

THE CONTACT INFORMATION OF THE DATA CONTROLLER:

Name: WUP Ltd.

Address: 1027 Budapest, Ganz street 16.

E-mail address: info@wup.hu

PRINCIPLES OF DATA MANAGEMENT AND DATA SECURITY

Personal data can be handled only for specific purposes, in order to exercise rights and perform obligations. The purpose of the data management, the data recording and the data management have to be fair and lawful. Only personal data which is essential and suitable to achieve the purpose of data management can be handled. The personal data can be managed only to the extent and for the time necessary to achieve that purpose. During data management, it has to be ensured that the data is accurate, complete and – if necessary for the purpose of the data management – up to date, and that the data subject can be identified only as long as it is necessary for the purpose of data management.

W.UP plans and carries out data management operations in ways that ensure the protection of the privacy of the data subjects during data management. W.UP – or if data processing is conducted, then the data processor – ensures the security of the data and takes all the necessary technical and organizational measures and develops procedural rules that are required by the Infotv and all other data protection and confidentiality regulations in force.

W.UP protects the personal data with adequate measures especially against unauthorized access, alteration, transmission, disclosure, deletion or destruction and accidental destruction and damages and also against data becoming inaccessible due to the changes in the technology used.

If W.UP takes data processing to other organizations (data processors), it informs the data subject on the fact of data processing and the identity of the data processor prior the consent of the data subject. The data processor will perform only the technical tasks related to data management and is not entitled to make substantive decisions concerning the data management, it can process the personal data obtained only in accordance with the provisions laid down by W.UP, it cannot perform data processing for its own purpose and it stores and preserves the personal data in accordance with the provisions laid down by W.UP.

During data management and data processing, the data will be available only to W.UP. – and in case of data processing, to the data processor -, and W.UP's – and in case of data processing, to the data processor's – employees who participate in the implementation of the objectives set out in the present Privacy Policy and who have an obligation of confidentiality regarding the data obtained, who may not disclose, use or make available to a third party or to the public this data, in accordance with their employment contract and the legal provisions.

THE LEGAL BASIS AND THE PURPOSE OF DATA MANAGEMENT

The management of personal data can take place based on the data subject's consent or on the basis of law or local government regulation (mandatory data management).

W.UP informs the data subject prior to the commencement of the data management if the data management is based on the data subject's consent or if it is mandatory. W. UP informs before the commencement of the data management on the range of the managed data, the

purpose and the legal basis of the data management, the duration of the data management and the persons authorized to perform the data management and data processing.

W.UP handles the data it manages for the following purposes:

- marketing (NAIH-110155/2016)
- newsletters (NAIH-110156/2016)

other purposes previously communicated to the data subject.

SUBSCRIPTION TO NEWSLETTERS

In regard to sending newsletters, the data management's purpose is to inform the data subject by direct response, such as electronic mail or other equivalent means of communication of W.UP's services and for the purposes of direct marketing regarding the W.UP's services.

The data subject acknowledges that, if an explicit and prior consent was given, the W.UP will send the newsletters to the e-mail addresses provided by the data subject and will manage the related data given until the withdrawal of consent. W.UP newsletters contain promotional offers, invitations and other offers, which aim to communicate to the data subjects via electronic mail the current information, promotions, programs, events, important news, new features.

The data subject can unsubscribe from newsletter at any time, free of charge, without any restrictions and any reasons given, by pressing the „unsubscribe“ button or in a response message. In case that the subscription is cancelled, the personal data related to the sending of newsletters managed by W.UP for this purpose will be deleted.

The cancellation of subscription to newsletters does not imply the withdrawal of consent regarding the data management of the data handled for other purposes. The deletion of the registration on the website does not mean the cancellation of subscription to newsletter, it must be requested separately.

THE COLLECTION AND STORAGE OF DATA

When accessing its website, due to technical reasons and in order to produce statistics on user behavior, W.UP is entitled to store the IP address of the visitor, the time of the visit and the address of the page visited. By accessing the website, the visitor accepts that this anonymized data is stored.

THE USE OF COOKIES

In order to ensure the personalized and efficient use and to provide the most complete user experience on the websites, W.UP places small data packets, so-called cookies on the website's visitors computers. Cookies are identifiers which can be sent by the W.UP server to the computer used by the website's visitor to identify the computer used during the stay on the website. The default setting for most browsers is to automatically accept these cookies. The storage of cookies can be turned off, or it is possible to set the browser to notify the user before the cookies are stored. With the first use of the website the visitor agrees that cookies will be stored in his or her computer.

W.UP also uses external contributors to collect statistics on the use of its websites. The service used GoogleAnalytics provided by Google Inc. Google Inc., as an external service provider has no access to the personal data related to the use of W.UP's websites (especially data provided during online registration). The W.UP websites include links to Google Inc. servers which are independent from W.UP. Contact: <http://www.google.com/analytics/>

THE DATA SUBJECT'S RIGHTS AND THEIR ENFORCEMENT

The data subject may request from W.UP

- information on personal data management
- the rectification of his or her personal data, and
- the deletion or blocking of his or her personal data – with the exception of mandatory data management

REQUESTING INFORMATION ON PERSONAL DATA MANAGEMENT

The data subject can request from W.UP information on the personal data of the subject handled by W.UP, the source of the data, the purpose of data management, its legal basis, duration and – in case of transmission of the personal data of the subject – the legal basis of the data transmission and the recipient of the data

W.UP will provided in writing the requested information in the shortest time possible, but no later than within 30 days from the filing of the request. The information is free of charge if the person requesting the information has not filed another request in the current year regarding the same set of data. In other cases, the data subject shall pay a fee of 2500 HUF per request.

RECTIFICATION OF PERSONAL DATA

W.UP will immediately rectify the personal data if the data does not meet the reality and truthful personal data is made available to W.UP.

DELETION OF PERSONAL DATA

Personal data must be deleted if

- its management is illegal;
- the data subjects request the deletion (with the exception of mandatory data management);
- it is incomplete or incorrect – and the situation cannot be remedied legally – provided that the deletion is not ruled out by law;
- the purpose of data management has ceased to exist or the legal time limit for storing the data has expired;
- it was ordered by the court or by the National Authority for Data Protection and Freedom of Information

BLOCKING OF PERSONAL DATA

W.UP will block the personal data instead of deleting it, if

- the data subject requests this, or
- based on the available information it can be assumed that the deletion would affect the data subject's legitimate interests

The personal data blocked in this manner can be managed only as long as the data management purpose for which deletion was not possible exists.

PERSONAL DATA MARKING

Personal data marking occurs when the data subjects challenges the correctness or the accuracy of the personal data managed by W.UP, but the inaccuracy or incorrectness of the personal data at issue cannot be clearly identified.

W.UP will inform the data subject and all those to whom the personal data was transferred to for data management on the rectification, blocking, marking and on the deletion of the data.

If W.UP fails to comply with the request of rectification, blocking or deletion, it will communicate in writing within 30 days from the filing of the request the factual and legal reasons of the rejection of the request.

OPPOSITION TO PERSONAL DATA MANAGEMENT

The data subject may oppose to the management of personal data,

- if the management of personal data is necessary only to fulfill the legal obligations or the legitimate interests of the controller (with the exception of mandatory data management);

- if the personal data is used for the purpose of direct marketing, public opinion research or scientific research; and
- in other cases specified by law

W.UP will analyze the opposition, will make a decision on the its merits and will inform the applicant in writing in the shortest time possible, but no later than within 15 days from the filing of the request. If W.UP decides that the opposition is well-grounded, it will cease the data management, will block the data and will inform of the opposition all those to whom the concerned personal data was transmitted and who are obliged to take measures to enforce the right to opposition.

W.UP is obliged to compensate for the damages caused by the unlawful management of the data subject's data or by the violation of the requirements of data security. The data subject may seek damages from W.UP in case that W.UP violates the right to privacy of the data subject by the unlawful management of his or her data or by the violation of the requirements of data security.

W.UP will be exempt from responsibility for the damages cause and from the obligation to pay damages, if it can prove that the damage or the violation of the data subject's rights were caused by insurmountable reasons beyond the scope of data management. Damages will not be paid in case that the damages or the violation of the privacy rights were caused by the intentional or grossly negligent conduct of the data subject.

APPEALS

The data subject may bring the matter before the court against W.UP if his or her rights related to the data management are violated. The data subject can bring the case before the court within 30 days from the communication of the decision or from the last day of the deadline for communication if the data subject does not agree with the decision taken by W.UP regarding his or her opposition.

The court shall give priority to the case. In this matter the tribunal has jurisdiction. The tribunal from the domicile or the residence of the data subject– at the option of the data subject – has jurisdiction over the lawsuit.

In case of violation of the data subject's rights in relation to the data management, the data subject can notify the National Authority for Data Protection and Freedom of Information in order to initiate an investigation.

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FINAL PROVISIONS

The aspects not regulated by the present Privacy Policy shall be governed by Hungarian law.