

DATA PROCESSING INFORMATION

DETAILS OF THE DATA CONTROLLER

Company name:	Growww Digital Korlátolt Felelősségű Társaság
Registered office:	1075 Budapest, Madách Imre út 13–14.
Company registry number:	Cg. 01-09-403325
Tax number:	24383347-2-42; EU tax number: HU24383347
Represented by:	László Szabó, managing partner
E-mail:	szabo@growwwdigital.com

In accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) we hereby provide the following information. This data processing information regulates data processing on the following sites:

- www.growwwdigital.com
- shopping.growwwdigital.com
- ppcfreelance.hu
- export.growwwdigital.com
- roishopper.com
- hungarecommstars.hu

The data processing information is available under the following link:
<https://www.growwwdigital.com/privacy-policy>

DEFINITIONS

- a) **personal data:** means 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, an identification 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.
- b) **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) **data 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 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:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- e) **recipient:** means 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) **third party:** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- g) **filing system:** means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.

- h) **data breach:** means 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.
- i) **representative:** means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation.
- j) **enterprise:** means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity.

PRINCIPLES OF DATA PROCESSING

1. Lawfulness, fair procedure and transparency

The enterprise shall perform the processing of data lawfully and fairly, in a transparent manner for the data subject (legality, fair procedure and transparency).

2. Purpose limitation

The enterprise shall only collect personal data for specified, explicit and legitimate purposes and such data shall not be further processed in a manner that is incompatible with those purposes (purpose limitation).

3. Data minimization

The enterprise shall process data in an adequate and relevant manner concerning the purpose(s) of such data processing, limited to what is necessary (data minimization). Accordingly, the enterprise shall not collect and store more data than what is absolutely necessary for the realization of the purposes of data processing.

4. Accuracy

The data processing performed by the enterprise is accurate and up to date. The enterprise shall do every reasonable measure in order to immediately erase or rectify personal data that is inaccurate with regards to the purposes of data processing (accuracy).

5. Storage limitation

The enterprise keeps personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, considering the storage obligation specified in the relevant legal regulations (storage limitation).

6. Integrity and confidentiality

The enterprise ensures the adequate security of personal data by applying appropriate technical or organizational measures, including protection against the unauthorized or unlawful processing, accidental loss, destruction or damaging of personal data (integrity and confidentiality).

7. Accountability

The enterprise is responsible for compliance with the principles detailed above; additionally, the enterprise shall demonstrate such compliance (accountability). Accordingly, the enterprise shall take care of the continuous enforcement of the provisions of the present internal regulation, the continuous review of its data processing, and if necessary, the amendment, modification of the data processing procedures. The enterprise prepares documentation to verify compliance with the legal obligations.

8. "Privacy by design"

Privacy by design refers to a highly conscious approach to data protection, which, in essence, means that both during the determination of data processing methods and throughout the data processing itself, the Data Controller implements appropriate technical and organizational measures – such as pseudonymization – for the effective realization of the aforementioned principles, fulfilling obligations, and incorporating legal guarantees. All these actions are systematically and thoroughly documented. In practice, this mindset is supported by the education and data protection awareness of employees, as well as the impact assessments, risk analysis, and interest balancing tests used during the introduction and/or regular review of data processing activities.

1. Contacting on www.growwwdigital.com

Data collecting, the scope of processed data and the purpose of data processing	
Name	Identifying the data subject.
E-mail address	Keeping contact. In the case of an e-mail address it is not necessary to include any personal data.
Telephone number	Keeping contact, managing offers, applying for trainings.
Company name	Identifying the data subject.
Website	Identifying the data subject's website.
Yearly/monthly online marketing budget	Data required for service volume, internal task allocation, and customer category definition.

Job title	Identifying the data subject, right of representation, area of interest during contact, ensuring a response by the appropriate specialist.
Information concerning data processing	
Scope of data subjects	All data subjects making contact through the website.
Term of data processing, deadline for the erasure of data	Immediately at the request of the data subject, by filling in a form or sending by e-mail.
Person of potential data controllers entitled to get to know the data, recipients of personal data	Personal data may be processed by the sales and marketing employees of the data controller, respecting the above principles.
Presentation of the rights of the data subjects related to data processing	<ul style="list-style-type: none"> The data subject may request from the data controller access to, rectification, erasure of or the restriction of the processing of personal data concerning her/him, and can object to the processing of such personal data, and the data subject has the right to the portability of data and to revoke consent at any time.
The data subject might initiate access to personal data, erasure, modification of personal data, restriction of processing of personal data, portability of data, objection against data processing activities through the following contacts	<p>By mail: Growww Digital Kft., 1075 Budapest, Madách Imre út 13–14.</p> <p>By e-mail: gdpr@growwwdigital.com</p>
Legal grounds for data processing	Consent of the data subject, Subsection a) of Section 6 (1), Section 5 (1) of the Information Act.
Information	Be advised that the data processing is based on your consent.
Data processors employed by the Data Controller	<p>DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/</p>
Purpose of Data Processing	Initiating contact, responding to inquiries and interests.

2. Request for Proposal at <https://shopping.growwwdigital.com/ajanlatkeres> page

The Fact of Data Collection, Scope of Processed Data, and Purpose of Data Processing

Name	Identification.
E-mail address	Contact maintenance. The e-mail address does not need to contain personal data.
Phone Number	Necessary for initiating contact, requesting offers, and applying for training.
Company Name	Identification of the data subject.
Job Title	Identification of the data subject, right of representation, area of interest during contact, ensuring a response from the appropriate professional.

Information Related to Data Processing

Scope of Data Subjects	All data subjects making contact through the website.
Duration of Data Processing, Deadline for Data Deletion	Until the proposal procedure is completed. If the offer does not result in a contract, the data will be deleted following the rejection of the offer.
Person of Potential Data Controllers Entitled to Know the Data, Recipients of Personal Data	Personal data may be processed by the sales and marketing employees of the data controller, respecting the above principles.
Presentation of Data Subjects' Rights Related to Data Processing	The data subject may request from the data controller access to, rectification, erasure, or restriction of processing of personal data concerning them, and can object to the processing of such personal data, and the data subject has the right to data portability, as well as to withdraw consent at any time.
The data subject may initiate access to personal data, erasure, modification, or restriction of processing of personal data, data portability, and object to data processing in the following ways	By mail: Growww Digital Kft., 1075 Budapest, Madách Imre út 13–14. By email: gdpr@growwwdigital.com

Legal Basis for Data Processing	The data subject's consent, Article 6 (1)(a) of the GDPR, Section 5 (1) of the Info Act.
Information	Please be informed that data processing is based on your consent.
Data Processor Employed by the Data Controller	DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/
Purpose of Data Processing	Initiating contact, making an offer.

3. Request for Proposal at <https://shopping.growwwdigital.com/ajanlatkeres-csp>

The Fact of Data Collection, Scope of Processed Data, and Purpose of Data Processing

Name	Identification
E-mail address	Contact maintenance. The e-mail address does not need to contain personal data.
Phone Number	Necessary for initiating contact, requesting offers, and applying for training.
Company Name	Identification of the data subject.
Job Title	Identification of the data subject, right of representation, area of interest during contact, ensuring a response from the appropriate professional.

Information Related to Data Processing

Scope of Data Subjects	All data subjects making contact through the website.
Duration of Data Processing, Deadline for Data Deletion	Until the completion of the offer procedure. If the offer does not result in a contract, the data will be deleted following the rejection of the offer.

Person of Potential Data Controllers Entitled to Know the Data, Recipients of Personal Data	Personal data may be processed by the sales and marketing employees of the data controller, respecting the above principles.
Presentation of Data Subjects' Rights Related to Data Processing	The data subject may request from the data controller access to, rectification, erasure, or restriction of processing of personal data concerning them, and can object to the processing of such personal data, and the data subject has the right to data portability, as well as to withdraw consent at any time.
The data subject may initiate access to personal data, erasure, modification, or restriction of processing of personal data, data portability, and object to data processing in the following ways:	By mail: Growww Digital Kft., 1075 Budapest, Madách Imre út 13–14. By email: gdp@growwwdigital.com
Legal Basis for Data Processing	The data subject's consent, Article 6 (1)(a) of the GDPR, Section 5 (1) of the Info Act.
Information	Please be informed that data processing is based on your consent.
Data Processor Employed by the Data Controller	DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/
Purpose of Data Processing	Initiating contact, making an offer.

4. Registration at <https://www.growwwdigital.com/hu/ga4-tudascsomag/>

Data Collection Fact, Scope of Data Processed and Purpose of Data Processing

Name, email address, phone number	Registration
Postal address	Invoicing

Information Related to Data Processing	
Scope of Affected Individuals	Those who register.

Duration of Data Processing, Deadline for Data Deletion	Data processing lasts until the termination of the registration.
Purpose of Data Processing	Providing access to resources about Google Analytics 4.
Personnel Authorized to Access the Data, Recipients of Personal Data	Personal data may be known by the data controller's marketing and backoffice staff during the setup of the Google Classroom account and invoicing.
Rights of Affected Individuals Related to Data Processing	The affected individual may request from the data controller access to personal data concerning them, rectification, deletion, or restriction of processing, and <ul style="list-style-type: none"> • may object to the processing of such personal data, and • has the right to data portability, and to withdraw consent at any time.
Access to personal data, deletion, modification, or restriction of processing, data portability, and objection to data processing can be initiated by the affected individual in the following ways	By mail: Growww Digital Kft. 1075 Budapest, Madách Imre út 13–14. Via e-mail: gdpr@growwwdigital.com
Legal Basis for Data Processing	The affected individual's consent, Article 6 (1) (a), Section 5 (1) of the Information Act.
Information	Please be informed that data processing is based on your consent. The affected individual can terminate their registration at any time, free of charge.
Data Processor Employed by the Data Controller	DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/ Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States) https://policies.google.com/privacy?hl=en-US

5. Newsletter Subscription at <https://www.growwwdigital.com/hu/hirlevelfeliratkozas/>

Data collecting, the scope of processed data and the purpose of data processing

Be advised that pursuant to Article 6 of Act 48/2008 on the fundamental requirements and certain limitations of business marketing activities the User can give his/her express prior consent to being contacted by the Service provider with its advertisements, other deliveries using the contact details provided when registering. Considering the provisions of this information the Customer may consent to the processing of his/her personal data necessary for sending advertisement offers by the Service provider. The Service provider shall not send unsolicited advertisements and the User can unsubscribe from the offer updates free of charge without restrictions or providing reasons. In this case the Service provider erases all personal data – that is necessary for sending advertisements – from its records and does not contact the User with further advertisements. The User can unsubscribe from the advertisements by clicking on the link in the message.

Name, e-mail address. phone number	Identification, enabling subscription for the direct marketing activity.
Date of subscription, IP address at the time of subscription	Performance of technical operations.
Area of Interest	Filtering the delivery of relevant content.

Information concerning data processing

Scope of data subjects	All data subjects subscribing for newsletter.
Term of data processing, deadline for the erasure of data	Data processing lasts until the revocation of the statement of consent, that is, unsubscribing.
Purpose of data processing	Contacting the data subject by electronic means to present news, professional content, podcasts, webinars, events, providing actual information, information about products, events, new functions, advertisement activity, marketing purposes, etc.
Person of potential data controllers entitled to get to know the data, recipients of personal data	Personal data may be processed by the sales and marketing employees of the data controller, respecting the above principles.
Presentation of the rights of the data subjects related to data processing	<ul style="list-style-type: none"> • The data subject may request from the data controller access to, rectification, erasure of or the restriction the processing of personal data concerning her/him, and • can object to the processing of such personal data, and • the data subject has the right to the portability of data and to revoke consent at any time.

The data subject might initiate access to personal data, erasure, modification of personal data, restriction of processing of personal data, portability of data, objection against data processing activities through the following contacts	By mail: Growww Digital Kft., 1075 Budapest, Madách Imre út 13–14. By e-mail: gdpr@growwwdigital.com
Legal grounds for data processing	Consent of the data subject, Subsection a) of Section 6 (1), Section 5 (1) of the Information Act and Section 6 (5) of Act 48/2008 on the fundamental requirements and certain limitations of business marketing activities
Information	Be advised that the data processing is based on your consent. The data subject can revoke their consent concerning direct marketing at any time, free of charge.
Data processors employed by the Data Controller	S.C The Marketer International Srl Strada Badea Cartan 66, Sector 2, Bucharest, Office 3, Zone II, Room 2, Bl. 40, Sc. A, Et. 5, Ap. 26 https://themarketer.com/ Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States) https://policies.google.com/privacy?hl=en-US

6. Direct marketing subscription at www.growwwdigital.com

Data collecting, the scope of processed data and the purpose of data processing	
<p>We inform you that, in accordance with Section 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities, the User may expressly consent in advance to being contacted by the Service Provider at the contact details provided during registration with offers and other mailings. Keeping in mind the provisions of this information, the Customer may consent to the Service Provider processing their personal data necessary for sending advertisement offers. The Service Provider does not send unsolicited advertising messages, and the User can unsubscribe from the sending of offers without restriction or justification, free of charge. In this case, the Service Provider will delete all personal data necessary for sending advertisements from its records and will not contact the User with further advertisement offers. The User can unsubscribe from the advertisements by clicking on the link in the message.</p>	
Name, e-mail address.	Identification, enabling subscription for the direct marketing activity.

Date of subscription	Performance of technical operations.
IP address at the time of subscription	Performance of technical operations.
Information concerning data processing	
Scope of data subjects	All data subjects subscribing for direct marketing.
Term of data processing, deadline for the erasure of data	Data processing lasts until the revocation of the statement of consent, that is, unsubscribing.
Purpose of data processing	Contacting the data subject by telephone or by electronic means to present news, professional content, podcasts, events, providing actual information, information about products, events, new functions, advertisement activity, marketing purposes.
Person of potential data controllers entitled to get to know the data, recipients of personal data	Personal data may be processed by the sales and marketing employees of the data controller, respecting the above principles.
Presentation of the rights of the data subjects related to data processing	<ul style="list-style-type: none"> • The data subject may request from the data controller access to, rectification, erasure of or the restriction the processing of personal data concerning her/him, and • can object to the processing of such personal data, and • the data subject has the right to the portability of data and to revoke consent at any time.
The data subject might initiate access to personal data, erasure, modification of personal data, restriction of processing of personal data, portability of data, objection against data processing activities through the following contacts	<p>By mail: Growww Digital Kft., 1075 Budapest, Madách Imre út 13–14.</p> <p>By e-mail: gdpr@growwwdigital.com</p>
Legal grounds for data processing	Consent of the data subject, Subsection a) of Section 6 (1), Section 5 (1) of the Information Act and Section 6 (5) of Act 48/2008 on the fundamental requirements and certain limitations of business marketing activities
Information	Be advised that the data processing is based on your consent. The data subject can revoke their consent concerning direct marketing at any time, free of charge.

Data processors employed by the Data Controller	S.C The Marketer International Srl Strada Badea Cartan 66, Sector 2, Bucharest, Office 3, Zone II, Room 2, Bl. 40, Sc. A, Et. 5, Ap. 26 https://themarketer.com/ Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States) https://policies.google.com/privacy?hl=en-US
--	---

7. Job Application at www.growwwdigital.com

Data Collection Fact, Scope of Data Processed and Purpose of Data Processing

Name, LinkedIn ID	Identification and identification of the referred profile.
E-mail address and phone number	Contact initiation, communication.
Professional knowledge	Ensuring appropriate job offers, defining the job.

Information Related to Data Processing

Scope of Affected Individuals	The applicants.
Duration of Data Processing, Deadline for Data Deletion	Data processing continues until the withdrawal of the consent statement, i.e., until unsubscribing.
Purpose of Data Processing	Providing job opportunities for the applicant.
Personnel Authorized to Access the Data, Recipients of Personal Data	Personal data may be processed by the data controller's HR and labor affairs staff, respecting the above principles.
Rights of Affected Individuals Related to Data Processing	<ul style="list-style-type: none"> The affected individual may request from the data controller access to personal data concerning them, rectification, deletion, or restriction of processing, and

	<ul style="list-style-type: none"> • may object to the processing of such personal data, and • has the right to data portability, and to withdraw consent at any time.
Access to personal data, deletion, modification, or restriction of processing, data portability, and objection to data processing can be initiated by the affected individual in the following ways	<p>By mail: Growww Digital Kft., 1075 Budapest, Madách Imre út 13–14.</p> <p>By email: gdpr@growwwdigital.com</p>
Legal Basis for Data Processing	The affected individual's consent, Article 6 (1) (a), Section 5 (1) of the Information Act, and Section 6 (5) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.
Information	Please be informed that data processing is based on your consent. The affected individual can unsubscribe from the newsletter at any time, free of charge.
Data Processor Employed by the Data Controller	<p>DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/</p>

8. Registration for webinars via Google Forms

Data Collection Fact, Scope of Data Processed and Purpose of Data Processing

Name	Registration
E-mail address	Registration and notifications about upcoming webinars and newly released professional content.

Information Related to Data Processing	
Scope of Affected Individuals	Those who register.
Duration of Data Processing, Deadline for Data Deletion	Data processing lasts until the termination of the registration.

Purpose of Data Processing	Providing access to lectures and other professional content, notifications about upcoming webinars and newly released professional content.
Personnel Authorized to Access the Data, Recipients of Personal Data	Personal data may be known by the data controller's marketing and sales staff during the management of webinars.
Rights of Affected Individuals Related to Data Processing	The affected individual may request from the data controller access to personal data concerning them, rectification, deletion, or restriction of processing, and <ul style="list-style-type: none"> • may object to the processing of such personal data, and • has the right to data portability, and to withdraw consent at any time.
Access to personal data, deletion, modification, or restriction of processing, data portability, and objection to data processing can be initiated by the affected individual in the following ways	By mail: Growww Digital Kft. 1075 Budapest, Madách Imre út 13–14. Via e-mail: gdpr@growwwdigital.com
Legal Basis for Data Processing	The affected individual's consent, Article 6 (1) (a), Section 5 (1) of the Information Act.
Information	Please be informed that data processing is based on your consent. The affected individual can terminate their registration at any time, free of charge.
Data Processor Employed by the Data Controller	Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States) https://policies.google.com/privacy?hl=en-US

9. Post-webinar questionnaire

Data Collection Fact, Scope of Data Processed and Purpose of Data Processing

Name	Identification of the data subject
E-mail address	Written communication
Phone number	Verbal communication according to the data subject's preference

Link to the data subject's social media profile(s) (Facebook, LinkedIn)	Preliminary assessment of potential service needs
Information regarding interest in digital marketing services	Preliminary assessment of potential service needs

Information Related to Data Processing	
Scope of Affected Individuals	Participants of the webinar conducted by the data controller
Duration of Data Processing, Deadline for Data Deletion	Until the conclusion of a contract between the data controller and the data subject, or until the withdrawal of consent. The data controller is entitled to decide, based on the data provided by the data subject, not to approach the data subject with an offer; in such a case, the data controller is obliged to immediately terminate the processing of data concerning the data subject
Purpose of Data Processing	Examining the possibility of a potential business relationship and building connections among the participants of the webinar conducted by the Data Controller who are interested in digital marketing services.
Personnel Authorized to Access the Data, Recipients of Personal Data	Personal data may be known by the data controller's marketing and sales staff during their sales activity.
Rights of Affected Individuals Related to Data Processing	The affected individual may request from the data controller access to personal data concerning them, rectification, deletion, or restriction of processing, and <ul style="list-style-type: none"> • may object to the processing of such personal data, and • has the right to data portability, and to withdraw consent at any time.
Access to personal data, deletion, modification, or restriction of processing, data portability, and objection to data processing can be initiated by the affected individual in the following ways	By mail: Growww Digital Kft. 1075 Budapest, Madách Imre út 13–14. Via e-mail: gdpr@growwwdigital.com
Legal Basis for Data Processing	The affected individual's consent, Article 6 (1) (a), Section 5 (1) of the Information Act.
Information	Please be informed that data processing is based on your consent. The affected individual can withdraw the consent anytime, free of charge.

Data Processor Employed by the Data Controller

Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States)
<https://policies.google.com/privacy?hl=en-US>

10. Using "Google Ads" conversion tracking

The data controller uses the "Google Ads" online advertisement program, and within it, the data controller uses the conversion tracking service of Google. Google conversion tracking is the analytic service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When the User accesses a website through a Google advertisement, a cookie, necessary for conversion tracking, gets to their computer. The validity of these cookies is limited, and they contain no personal data, therefore the User cannot be identified by them.

When the User browses certain pages of the website, and the cookie has not yet expired, then Google and the data controller both can see that the User clicked on the advertisement. From the masses of users the individual user, data subject cannot be identified, so personal data is not processed.

All Google AdWords customers receive different cookies, so these cannot be tracked through the websites of the customers of AdWords.

The information obtained with the help of the conversion tracking cookies serve the purpose of preparing conversion statistics for customers of AdWords who selected conversion tracking. This is how customers get informed about the number of users clicking on their advertisements and forwarded to a site with a conversion tracking label. However they do not get any information that could be used to identify any of the users.

If you do not want to participate in conversion tracking, you can refuse it by disabling the option to install cookies in your browser. After this you will not be in the conversion tracking statistics.

Additional information and the data protection statement of Google can be found on the following website: www.google.de/policies/privacy/

11. The "Google Analytics" application

The websites of Growww Digital Kft. use the Google Analytics application, the web analytics service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files saved to your computer, helping the analysis of the use of the website visited by the User.

Information created with the cookies related to the website used by the User is usually stored on a US server of Google. By activating IP-anonymization on the website Google shortens the IP address of the User within the member states of the European Union or in other states party to the treaty on the European Economic Area on arrival to the server, before being recorded in storage. (<https://support.google.com/analytics/answer/2763052?hl=en>)

The full IP address is only forwarded to the US server of Google to be shortened there in exceptional cases. On behalf of the operator of this website Google shall use this information to evaluate how the User used the website and to prepare reports for the operator of the website related to the activity of the website and to perform additional services related to website and internet use.

Within Google Analytics the IP address forwarded by the browser of the User is not cross-referenced with other data of Google. You can prevent cookie storage by appropriately setting your browser; however, be advised that in this case not all functions of this website might be fully usable. You can also prevent Google from collecting and processing data of the User related to website use provided by cookies (including the IP address), if you download and install the browser plugin available under the following link. <https://tools.google.com/dlpage/gaoptout?hl=hu>

12. Using cookies

Data collecting, the scope of processed data and the purpose of data processing

Individual identifier, dates, times	Identifying users and tracking visitors.
Information concerning data processing	
Scope of data subjects	All data subjects visiting the website.
Purpose of data processing	Identifying users and tracking visitors.

Term of data processing, deadline for the erasure of data	Until the end of the relevant visitor's work session or for a period of two years according to the classification criteria issued by google analytics: https://developers.google.com/analytics/devguides/collecti on/analyticsjs/cookie- usage
Person of potential data controllers entitled to get to know the data, recipients of personal data	The data controller does not process personal data by using the cookies.
Presentation of the rights of the data subjects related to data processing	The data subjects can delete cookies in the Tools/settings menu of browsers, usually under the settings of the menu item Data protection.
Legal grounds for data processing	No consent is necessary from the data subject if the only purpose of cookie use is to forward information through the electronic telecommunication network or if it is fundamentally necessary for the service provider to provide services related to information society and expressly requested by the subscriber or user.

13. Social sites

Data collecting, the scope of processed data and the purpose of data processing	
Name of the person registering on Facebook/Google+/Youtube/Instagram/LinkedIn etc. social sites and the public profile picture of the user.	Sharing certain content elements, services, results or the website itself of a website on community sites, "liking", "tracking", promotion of the same.
Information concerning data processing	
Scope of data subjects	All data subjects who registered to the social sites Facebook/Google+/Youtube/Instagram/LinkedIn, etc. and "liked" or "follows" the website.
Purpose of data processing	Sharing certain content elements, services, results or the website itself of a website and the enterprise on community sites, "liking", "tracking", promotion of the same.

Term of data processing, deadline for the erasure of data	Term of data processing, deadline for the erasure of data, person of potential data controllers entitled to get to know the data and the presentation of the rights of the data subjects related to data processing: The data subject can find information about the source of data, the processing of data, the method of forwarding data and its legal grounds on the specific social site. Data processing is realized on the social sites, therefore the regulation of the specific social site governs the term, method of data processing and the erasure and modification options of the data.
Legal grounds for data processing	The willing consent of the data subject to the processing of his/her personal data on social sites.

14. Other data processing

If any questions arise in the course of using our data processing services, or if the data subject has any problems, they can contact the data controller through the contacts indicated on the website (telephone, email, social sites, etc.).

After 2 years at the most from the collection of the data in question the Data Controller deletes the received e-mails, messages, data provided through telephone, Facebook, etc. together with the name and e-mail address and other, willingly provided personal data of the inquirer.

We provide information about data processing forms not listed in the present information document when the data is recorded.

At exceptional official inquiries or in the case of inquiries by other bodies based on authorization conferred by legal regulations the Service provider is obliged to provide information, provide and disclose data or to provide documents.

In these cases the Service provider only discloses personal data to the inquirer – if the inquirer indicated the exact purpose and the scope of data – in the amount and to the extent absolutely necessary for the realization of the purpose of the inquiry.

DATA TRANSFER, DATA PROCESSORS

Hosting service provider

1. Activity performed by the data processor: Hosting services

2. Name and contact details of data processor:

Concerning server, domain and others

DigitalOcean

101 Avenue of the Americas, 10th Floor New York, NY 10013

<https://www.digitalocean.com/legal/terms/>

3. Data processing, scope of processed data: All personal data provided by the data subject.
4. Scope of data subjects: All data subjects using the website.
5. Purpose of data processing: Making the website accessible, its appropriate operation.
6. Term of data processing, deadline for the erasure of data: Data processing lasts until the end of the agreement between the data controller and the hosting provider or until the erasure request of the data subject addressed to the hosting provider.
7. Legal grounds for data processing: consent of the User, Section 5 (1) of the Information Act, Subsection a) of Section 6 (1), and Section 13/A (3) of Act 108/2001 on certain issues of electronic commercial services and services related to information society.

Newsletter Provider

1. Activity performed by the data processor: Newsletter database management, SMTP provision.
2. Data processor's name and contact information:
Newsletter Provider

S.C The Marketer International Srl

Strada Badea Cartan 66, Sector 2, Bucharest, Office 3, Zone II, Room 2, Bl. 40, Sc. A, Et. 5, Ap. 26

<https://themarketer.com/>

3. Fact of data processing, scope of processed data: Name and email address provided by the data subject for database management.
4. Scope of data subjects: Those subscribing to the newsletter.
5. Purpose of data processing: Sending newsletters about the company's activities, products, and promotions.
6. Duration of data processing, deadline for data deletion: Data processing continues until the termination of the agreement between the data controller and the newsletter provider, or until the data subject's request for deletion to the newsletter provider.
7. Legal basis for data processing: The user's consent, Section 5 (1) of the Information Act, Article 6 (1) (a), and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society.
- 1.

Newsletter subscription, webinar registration

1. Activity performed by the data processor: Hosting services
2. Name and contact details of data processor: Google LLC (600 Amphitheatre Parkway, Mountain View, CA

94043, United States) <https://policies.google.com/privacy?hl=en-US>

3. Data processing, scope of processed data: Name, email address, telephone number provided by the data subject.
4. Scope of data subjects: Data subject subscribing to the newsletter and/or registering to a webinar.
5. Purpose of data processing: Sharing newsletters, organising webinars
6. Term of data processing, deadline for the erasure of data: Until the purpose of the data processing requires.
7. Legal grounds for data processing: consent of the data subject.

Google LLC, as a data processor, is not a company registered in the European Union; it is therefore a third country company, but is party to the Data Privacy Framework between the EU and the USA, the UK and Switzerland and the USA (<https://www.dataprivacyframework.gov>). In this respect, it has been data protection compliant.

LEGAL REMEDIES

The data subject may request information about the processing of his/her personal data and may request the rectification his/her personal data, the erasure, revocation of personal data – with the exception of mandatorily processed data -, restriction of data processing, and may exercise her/his right to the portability of data and to objection in the manner indicated when the data is recorded or through the customer service of the data controller. Concerning data processing forms in the present information document the data controller is Growww Digital Kft.

Right to information

At the request of the data subject Growww Digital Kft. takes appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

Right of access by the data subject

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; the envisaged period for which the personal data will be stored; the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; any available information as to the source of data; the existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. Growww Digital Kft shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller

may charge a reasonable fee based on administrative costs.

At the request of the data subject Growww Digital Kft. provides the information in electronic format. The right to information can be exercised in writing through the contact options indicated on page 2 of this information document.

Information can be provided for the data subject – after credibly certifying his/her identity and after his/her identification - at his/her request orally too.

Right to rectification

Growww Digital Kft. corrects personal data if it does not correspond with reality and the personal data corresponding with reality is available.

Right to erasure

The data subject shall have the right to obtain from Growww Digital Kft. the erasure of personal data concerning him or her without undue delay and Growww Digital Kft. shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and where there is no other legal ground 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 have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

Erasure of data cannot be initiated if the data processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the controller 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 reasons of public interest in the area of public health or for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or for the establishment, exercise or defense of legal claims.

Right to restriction of processing

The data subject shall have the right to obtain from Growww Digital Kft. restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;

- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. Growww Digital Kft. informs the data subject before the restriction of processing is lifted.

Right to data portability

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

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her that is necessary for the performance of a task carried out for reasons of public interest or in the exercise of official authority vested in the controller or for the enforcement of rightful interests of the controller or a third party, including profiling based on the mentioned provisions.

In the case of objection the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. In the case of objection against the processing of personal data for direct marketing purposes Growww Digital Kft will not process data for such purposes.

Automated individual decision-making, 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 entitlement shall not apply if the processing is necessary for entering into, or performance of, a contract between the data subject and a data controller; is authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests decision; or is based on the data subject's explicit consent.

Right to revocation

The data subject has the right to revoke his/her consent at any time. Revocation of the consent does not concern the lawfulness of data processing based on consent before the revocation.

Procedural rules

The data controller shall inform the data subject without undue delay but within one month from the reception of the request at the most about measures taken pursuant to a request according to Articles 15 to 22 of the GDPR. If necessary, considering the complexity of the request and the number of requests this deadline can be extended by another two months.

The data controller shall inform the data subject about the extension of the deadline within one month from receiving the request, indicating the reasons of the delay. If the data subject submitted the request electronically, the information shall be given electronically as well except if the data subject requests otherwise.

If the data controller does not take measures pursuant to the request of the data subject, then it shall inform the data subject without delay but within one month from receiving the request at the latest about the reasons of failing to take measures and about that the data subject may file a complaint at a supervisory authority and may exercise his/her right to court legal remedy.

Growww Digital Kft. provides the requested information and intelligence free of charge. If the request of the data subject is clearly unfounded or – in particular due to its repetitive manner – excessive, the data controller, considering the administrative costs of providing the requested information or intelligence or taking the requested measure, may charge a reasonable fee or may deny taking measures based on the request.

The data controller informs all recipients about all rectifications, erasure or restriction of data processing to whom or to which personal data was disclosed except if it is impossible or would require a disproportionate amount of effort. At his or her request the data controller shall inform the data subject about such recipients.

The data controller provides a copy of the personal data being processed for the data subject. Based on the administrative costs the data controller may charge a reasonable fee for additional copies requested by the data subject. If the data subject submitted the request electronically, the information shall be given electronically as well except if the data subject requests otherwise.

Compensation and liability

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage

suffered. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of the legal regulations specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller. Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damage. A 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.

Complaint

If you have any questions, problems concerning data processing by Growww Digital Kft., please contact our company through the contact options specified on page 2 of the information document.

Filing complaints

In the case of potential infringements on the part of the data controller complaints can be submitted at the Hungarian National Authority for Data Protection and Freedom of Information:

**Hungarian National Authority for Data Protection and
Freedom of Information**

1055 Budapest, Falk Miksa utca 9–11.

Mail address: 1363 Budapest, Pf.: 9.

Telephone: +36 (30) 683-5969

+36 (30) 549-6838

+36 (1) 391 1400

Fax

+36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

This information document becomes effective on 25 May 2018

Last modification: 31 March 2026