

PRIVACY STATEMENT

1. Introduction

This document will inform you, as a visitor to the website www.secaas.hu and as a user of our services, about the data management and privacy policy of SECaaS Limited Liability Company (hereinafter referred to as "SECaaS" or "PII Controller").

THE PII CONTROLLER AND ITS CONTACT DETAILS

Name of the PII controller: SECaaS Kft.
The PII controller's mailing address: 1135 Budapest, Jász u. 58 B/B 1/3.
The PII controller's email address: info@secaas.hu
Company registration number: 01-09-390929
VAT: HU27457137

2. Normative references

- 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)
- Hungarian Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services (in particular § 13/A) (hereinafter referred to as the " E-commerce Act.");

The principles and procedures set out in this Privacy Statement comply with the requirements of the EU GRPR Regulation. The following information is provided on the protection of natural persons regarding the processing of PII and on the free movement of such data, in accordance with the Regulation.

SECaaS respects the right to privacy of all visitors to the site. We collect and use information from our website only as described in this privacy statement. This privacy statement applies only to the privacy practices of the data and information collected by SECaaS. If you do not agree with any section of this privacy statement, please do not use our website.

The privacy statement (policy) is available at:

<https://www.secaas.hu/en/wp-content/uploads/2022/05/Privacy-statement.pdf>

Any subsequent amendments to this Policy will take effect upon publication at the above address.

3. Terminology and definitions

- 3.1 „Personal data” or “PII” 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;
- 3.2 „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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 3.3 „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;
- 3.4 „processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 3.5 “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;
- 3.6 „consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- 3.7 „personal data breach” means 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;

4. Website content

The content of the SECaaS website is protected by law as intellectual property. The information and content provided may not be re-used without our explicit permission, except for private or other personal use within the limits of the General Data Protection Regulation. Communications, news or blog posts presented on the website are available to the editors of newspapers or news portals for publication. Prior to publication, SECaaS will ask the publisher to provide us with a copy of the publication.

This privacy statement does not cover any link within the SECaaS website that leads to other websites. We have no authority or responsibility over the content or design of other companies’ websites that can be assessable via hyperlinks from our website. Furthermore, we explicitly disassociate from any internet content that might be illegal or offensive. You take full responsibility for using hyperlinks on our website to access other companies’ websites. We recommend that you check the policies concerning data protection and privacy of the SECaaS partners or other users whose websites can be accessed through our website.

SECaaS shall not be liable for any consequences caused by the opening or otherwise accessing our partners' websites.

5. Principles relating to processing of personal data

Personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- e) kept 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

The controller shall be responsible for and be able to demonstrate compliance with a) – f). ('accountability').

The data controller declares that its processing will be carried out in accordance with the principles set out in this point.

6. Fact, data types, objectives, retention of personal data

CONTACT US

a) PII, objectives and legal basis:

The contact form (accessed via the 'Contact' buttons) with the details of all the data subjects sending a message:

PII	Objectives	Legal basis
Name	Identification	GDPR Article 6 1.(a), (b)
Email	Correspondence	
Phone	Correspondence	
Message	Required to respond	
Where did you hear about us?	Measuring the effectiveness of our advertising	GDPR Article 6 1.(a)
Date/Time of contact	Technical information (e.g. response priorities and deadlines)	GDPR Article 6 1.(a),(b) and (c)

b) The persons concerned as data subject:

All stakeholders sending a message through the contact form.

c) The duration of the processing, the time limit for deletion of the data: :

If one of the conditions set out in Article 17(1) of the GDPR is met, it shall continue until the data subject's request for deletion.

d) The persons who may be entitled to access the data, the recipients of the personal data:

Personal data may be processed by authorised staff of the PII controller, in compliance with the above principles.

e) Description of data subjects' rights in relation to data processing:

The data subject may request the controller to access, modify, erase or restrict the processing of personal data relating to him or her, and the data subject shall have the right to data portability and to withdraw consent at any time.

f) Submitting a request: the data subject may request access to, deletion, modification or restriction of the processing of personal data, or the portability of data, by post or e-mail to the contact details of the controller indicated in the Introduction section.

g) Legal basis for processing:

consent of the data subject, Article 6 (1) (a) and (b). By contacting us, you consent to the controller processing of your personal data (see point 1 of this section) in accordance with this policy.

h) Please be informed that the present processing is based on your consent or is necessary to make you an offer. You are required to provide personal data in order to contact us. Not providing the data will result in you not being able to contact the controller. Withdrawal of

consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

CUSTOMER RELATIONS

a) PII, objectives and legal basis:

PII	Objectives	Legal basis
Name	Identification	Article 6(1)(b) and (c) of the GDPR, in the case of enforcement of claims arising from the contract, § 6:21 of Act V of 2013 on the Hungarian Civil Code
Email	Correspondence	
Phone	Correspondence	
Message	performance of contracts, business objective	

- b) The persons concerned as data subject:
All data subjects in contact with the controller by phone/e-mail/in person or in a contractual relationship.
- c) The duration of the processing, the time limit for deletion of the data:
Correspondence containing requests will be kept until the request for erasure by the data subject, but for a maximum of 2 years.
- d) The persons who may be entitled to access the data, the recipients of the personal data:
Personal data may be processed by authorised staff of the PII controller, in compliance with the above principles.
- e) Description of data subjects' rights in relation to data processing:
The data subject may request the PII controller to access, modify, erase or restrict the processing of personal data concerning him or her, and the data subject shall have the right to data portability and to withdraw consent at any time.
- f) Submitting a request:
the data subject may request access to, deletion, modification, or restriction of the processing of personal data, or the portability of data, by post or e-mail to the contact details of the controller indicated in the Introduction section.
- g) Legal basis for processing:
Please be informed that the processing is necessary for the fulfilment of the contract and for the submission of the offer.
You are required to provide personal data to enable us to fulfil the contract and/or other requests. Not providing the data will result in our inability to process the contract/request.

ONLINE SHOPPING

- a) PII, objectives and legal basis:
 PII of all data subjects purchasing services through the Checkout form:

PII	Objectives	Legal basis
Contact name	Identification	Article 6(1)(b) and (c) of the GDPR and Article 13/A(1), (2) and (3) of the E-commerce Act (Hungarian).
Billing details (Company name /if applicable/, address of invoice originator)	Issuing an invoice, correspondence	
Phone	Correspondence	
Email	Correspondence	
VAT number	issuing an invoice	
Other comment	Fulfilling requests	
Date/Time of payment	Technical information (e.g. response priorities and deadlines)	
Last 4 characters of bank card number	Technical information to identify the transaction	
Trainee name and email address	Required to assign the purchased service to a specific trainee	Article 6(1)(b) of the Regulation and Section 13/A(3) of the E-commerce Act (Hungarian).
Language of selected product		

- b) The persons concerned as data subject:
 All data subjects who purchase services on the website.
- c) The duration of the processing, the time limit for deletion of the data:
 If one of the conditions specified in Article 17(1) of the GDPR is met, it shall continue until the data subject's request for deletion. The controller shall inform the data subject by electronic communication of the erasure of any personal data provided by the data subject pursuant to Article 19 of the GDPR. If the data subject's request for erasure also includes the e-mail address provided by him or her, the controller shall erase the e-mail address following the notification. Except in the case of accounting records, since, pursuant to Article 169 (2) of Hungarian Act C of 2000 on Accounting, these data must be kept for 8 years. The contractual data of the data subject may be deleted after the expiry of the civil law limitation period on the basis of a request for deletion by the data subject.
 The accounting documents (including general ledger accounts, analytical or detailed records) directly and indirectly supporting the accounting records must be kept for at least 8 years in a legible form, retrievable by reference to the accounting records.
- d) The persons who may be entitled to access the data, the recipients of the personal data:
 Personal data may be processed by the staff of the PII controller in charge of sales, invoicing and accounting, in compliance with the above principles.
- e) Description of data subjects' rights in relation to data processing:

The data subject may request the PII controller to access, modify, erase or restrict the processing of personal data concerning him or her, and the data subject shall have the right to data portability and to withdraw consent at any time.

h) Submitting a request:

the data subject may request access to, deletion, modification, or restriction of the processing of personal data, or the portability of data, by post or e-mail to the contact details of the controller indicated in the Introduction section.

f) Legal basis for processing:

We process your personal data in accordance with the legal framework set out in section a) of this chapter.

Please be informed that the processing is necessary for the performance of the contract and for the issuing of an invoice in accordance with accounting legislation. In the event of enforcement of claims arising from the contract, the provisions of Act V of 2013 on the Hungarian Civil Code apply pursuant to § 6:21 [Effect of the expiration of time] and § 6:22 [Limitation period].

Failure to provide this information will result in our inability to process your order.

NEWSLETTER, DM ACTIVITIES

a) A PII, objectives and legal basis:

The PII of all data subjects who subscribe to the newsletter when purchasing the service or sign up to the newsletter via the Data Controller's website or other social platforms (e.g. LinkedIn):

PII	Objectives	Legal basis
Name, email address	Identification, registration for newsletters/coupons	Consent of the data subject, Article 6(1)(a) of the GDPR. Article 6(5) of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Economic Advertising Activities.
Date/Time of registration	Execution of technical operation	

b) The persons concerned as data subject:

All data subjects who subscribe to the newsletter.

c) Az Consent of the data subjects to the processing:

Pursuant to Article 6 of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activity, the User (Data Subject) may expressly consent in advance to being contacted by the Data Controller with advertising offers and newsletters at the contact details provided at the time of registration or purchase.

In addition, the Customer may, subject to the provisions of this Privacy Policy, consent to the processing of personal data by the Data Controller for the purpose of sending promotional offers and newsletters.

The Data Controller declares that it will not send unsolicited commercial communications and that the User may unsubscribe from receiving newsletters and offers without restriction and without giving any reason, free of charge. In this case, the Data Controller will delete all personal data necessary for sending advertising messages from its records and will not contact the User with further advertising offers. The User may unsubscribe from advertising by clicking on the link in the message.

- d) Purpose of the processing:
sending electronic messages (e-mail) containing advertising to the data subject, providing information on current information, products, promotions, etc.
- e) The duration of the processing, the time limit for deletion of the data: data processing lasts until the withdrawal of the consent, or until the User unsubscribes.
- f) The persons who may be entitled to access the data, the recipients of the personal data: Personal data may be processed by the staff of the PII controller in charge of sales, in compliance with the above principles.
- g) Description of data subjects' rights in relation to data processing:
The data subject may request the PII controller to access, modify, erase or restrict the processing of personal data concerning him or her, and the data subject shall have the right to data portability and to withdraw consent at any time.
- h) Submitting a request:
the data subject may request access to, deletion, modification, or restriction of the processing of personal data, or the portability of data, by post or e-mail to the contact details of the controller indicated in the Introduction section
- i) Az Legal basis for processing:
Please be informed that the processing is based on your consent and the legitimate interest of the Data Controller. You are required to provide your personal data if you wish to receive newsletters from us. We have a legitimate interest in receiving your consent to send you newsletters. Please also note that you can withdraw your consent at any time by clicking on the unsubscribe button. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal

7. Data processors

The data controller uses data processors to facilitate its own data processing activities and to fulfil its contractual and legal obligations with data subjects.

The data controller shall place great emphasis on using only processors that offer adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the requirements of the Regulation (GDPR) and to protect the rights of data subjects.

The processor and any person acting under the control of the controller or the processor who has access to the personal data shall process the personal data covered by this Policy only in accordance with the instructions of the controller.

The controller shall be legally responsible for the activities of the processor. A processor shall be liable for damage caused by processing only if it has failed to comply with the obligations specifically imposed on processors by the GDPR or if it has disregarded or acted contrary to lawful instructions from the controller.

The processor has no substantive decision-making power regarding the processing of the data.

The controller may use service providers as Data processors to provide the IT services and support.

List of Data Processors

Data processing activities	Company name	Contact details
Web hosting service	Websupport Magyarország Kft.	Victor Hugo u. 18-22. 1132 Budapest, Hungary email: info@tarhelypark.hu ;
IT hosting service	NKS Magyarország Kft.	Tomori u. 34. 1138 Budapest, Hungary info@nks.hu ;
Accounting	Dominkóné Fazekas Erzsébet	Förhénc utca 1/a 8800 Nagykanizsa, Hungary

8. Recipients to whom personal data are disclosed (data transfer)

ONLINE PAYMENT SERVICE PROVIDER

- a) Activity performed by the Recipient: online payment service
Payments made from the SECaaS website are processed by a third-party service called Stripe. The information provided during the payment process is not stored in SECaaS's systems, but is transferred to Stripe solely for the purpose of processing the payment initiated by the user. The SECaaS will only record the fact of a successful or unsuccessful transaction in relation to your payment. To find out how Stripe processes and uses your information, please read their privacy policy: <https://stripe.com/privacy>
- b) Name and contact details of the recipient:

Stripe Inc. Stripe Payments Europe Limited
1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland
Attention: Stripe Legal

email: privacy@stripe.com

- c) The fact of processing, the scope of the data processed:
Payment and billing details, name, e-mail address.
- d) Data subjects:
All data subjects who choose to pay on the website.
- e) Purpose of data processing:
Processing online payments, confirming transactions and to protect users (fraud-monitoring).
- f) The duration of the processing, the time limit for deletion of the data: Processing takes until the online payment is processed. For information on the storage of data on the service provider side, please refer to Stripe's Privacy Policy, see section a).
- g) Legal basis for processing: article 6(1)(b) GDPR. The processing is necessary for the purposes of completing an online payment at the request of the data subject. For more information about the legal bases, please refer to the Stripe Privacy Policy, see point a).

The data subject's rights:

- a) You can find out about the circumstances of the processing,
- b) You have the right to obtain feedback from the controller on whether your personal data are being processed and to access all information relating to the processing.
- c) You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- d) You have the right to obtain, at your request and without undue delay, the rectification of inaccurate personal data by the controller.

9. Handling of cookies

- a) Use of external services:
When you visit our website, you should be aware that we use third-party services, such as Google Analytics, to collect standard web log data and details of visitor behaviour patterns. This is done in order to collect information about the number of visitors to our website. Processing this information does not in any way allow visitors to be identified.
- b) The use of cookies does not require the prior consent of the data subject. We use the following types of cookies on our website: "security cookies", "essential cookies - e.g. shopping cart", "Functional cookies", "Statistical and marketing cookies".
- c) The fact of processing, the scope of the data processed:
Generated unique identifier, dates, times
- d) Data subjects:
All data subjects visiting the website.
- e) Purpose of the processing:
Identification of users and tracking of visitors.
- f) Identity of the potential data controllers who have access to the data:
No personal data are processed by the data controller through the use of cookies.
- g) Description of data subjects' rights in relation to data processing:
The data subject has the possibility to delete cookies in the Tools/Settings menu of the browsers, usually under the Privacy settings.

h) Legal basis, duration of processing and time limit for deletion of data:

Type of cookie	Legal basis for processing	The duration of the processing
Session cookies	Act CVIII of 2001 (E-commerce Act.) § 13/A (3)	The period until the end of the current visitor session
Permanent or saved cookies	Act CVIII of 2001 (E-commerce Act.) § 13/A (3)	until the deletion of the data subject
Statistical, marketing cookies	Act CVIII of 2001 (E-commerce Act.) § 13/A (3)	up to 2 years

The consent of the data subject is not required where the sole purpose of the use of cookies is the transmission of communications over an electronic communications network or where the use of cookies is strictly necessary for the provision of an information society service explicitly requested by the subscriber or user.

Rejecting cookies:

The primary purpose of placing cookies is to facilitate the usability of the website. However, the use of cookies is not mandatory. You can refuse the use of cookies through your browser settings. You will find further information on the appropriate procedure in the help menu of your browser:

- [Microsoft Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)
- [Firefox](#)
- [Opera](#)

10. Social networking sites

- a) We use third party service providers such as LinkedIn, Facebook, YouTube, and others to manage our social media interactions.
- b) Our social media interactions are conducted through the social media accounts listed above. Each service provider has its own privacy policy and statement outlining how data is collected, processed, stored, and deleted. To read their policies and statements, be sure to visit their websites.
- c) If you send us a private or direct message via social media, the message will be stored in accordance with the privacy policy of the relevant social media platform.

- d) SECaaS will not share the information of SECaaS followers with any other network unless specifically requested by the followers. We do not send marketing emails to subscribers of our network without prior consent. We may also publish a link to subscribe to our news and newsletters.
- e) Fact of data collection, scope of data processed:
Names registered on LinkedIn, Facebook, YouTube, etc. social networking sites.
- f) Scope of the data subjects:
All data subjects who have registered on the social networking sites and have "liked" the SECaaS social networking site or contacted the data controller via the social networking site.
- g) Purpose of data collection:
Sharing or "liking", following, promoting certain content, products, actions, or the website itself on social networking sites.
- h) Legal basis for processing: the data subject's voluntary consent to the processing of his/her personal data on social networking sites.

11. Data subjects' rights

If you are a member of the European Union (EU) or the European Economic Area (EEA), or if you access the site from these territories, you have the following rights under the GDPR:

- right of access to your personal data;
- the right to rectify inaccurate personal data;
- right to erasure of your personal data;
- the right to be forgotten of your personal data;
- the right to data portability of your personal data;
- right to object to the processing of your personal data;
- right to object to direct marketing;
- right to object to automated decision-making in individual cases, including profiling.

In order to exercise your rights under the GDPR, you may send a request to the Data Controller at info@secaas.hu to exercise the above rights. In all cases, we will verify the identity of the person submitting the request for access to personal data before providing any information. This may be done via the e-mail address used to order the service.

The first copy of your data will be provided free of charge. The Controller may request reimbursement of additional copying and administrative costs.

The controller will inform you of the action taken on these requests without undue delay and in any event within 1 month of receipt of the request.

If necessary, this may be extended by 2 months. The controller shall inform you of the extension, stating the reasons for the delay, within 1 month of receipt of the request.

If the controller does not act on your request, it shall inform you without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of your right to lodge a complaint with a supervisory authority and to seek judicial remedy.

12. Security of data processing

The controller and the processor shall taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in accordance with Article 32 of the GDPR.

Informing the data subject about the personal data breach

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject without undue delay.

The information provided to the data subject shall clearly and plainly describe the nature of the personal data breach and shall state:

- the name and contact details of any other contact person who can provide further information;
- describe the likely consequences of the data breach;
- describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

The data subject will not need to be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational protection measures and these measures have been applied to the data affected by the personal data breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;
- the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise;
- the provision of information would require a disproportionate effort. In such cases, the data subjects shall be informed by means of publicly disclosed information or by means of a similar measure ensuring that the data subjects are informed in an equally effective manner.

If the controller has not yet notified the data subject of the personal data breach, the supervisory authority may, after having considered whether the personal data breach is likely to present a high risk, order the data subject to be informed.

Reporting data breach to the authority

The data breach shall be notified by the controller to the supervisory authority designated under Article 55 without undue delay and, where possible, no later than 72 hours after the data breach has come to its attention, unless the data breach is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by the reasons justifying the delay.

Review in case of mandatory data processing

If the duration of the mandatory processing or the periodic review of its necessity is not specified by law, local government regulation or a binding legal act of the European Union, the controller shall review, at least every three years from the start of processing, whether the processing of personal data processed by the controller or by a processor acting on its behalf or under its instructions is necessary for the purposes of the processing.

The controller shall document the circumstances and the results of this review, keep this documentation for ten years after the review and make it available to the National Authority for Data Protection and Freedom of Information (hereinafter referred to as the Authority) upon request.

13. Complaints

A complaint against a possible infringement by the data controller can be lodged with the National Authority for Data Protection and Freedom of Information:

Nemzeti Adatvédelmi és Információszabadság Hatóság

1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf. 9.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu