



## Data processing and privacy policy

**qsd2 Kft.** (hereinafter: *qsd2 Ltd.*)

H-9028 Győr, Serfőződombi dűlő 3. (headquarters)

28950183-2-08 (tax number)

*Data processing and privacy policy (hereinafter: DPPP) of qsd2 Ltd.*

The objective of the DPPP is that qsd2 Ltd, in each case, before collecting the data, communicates to the data subject the purpose of the processing, the legal basis for the processing and all relevant information concerning the processing.

### 1. Basic information

- 1.1. Name of data controller: qsd2 Ltd.
- 1.2. Headquarters of data controller: H-9028 Győr, Serfőződombi dűlő.
- 1.3. Electronic contact details of data controller: [service.qsd@gmail.com](mailto:service.qsd@gmail.com)
- 1.4. Legal representative of data controller: Csizmadia, Szilárd CEO

### 2. Legal basis

- 2.1. Jurisdiction: current location of qsd2 Ltd - Hungary
- 2.2. Regulation 2016/679 of the European Parliament and of the Council of the European Union (hereinafter: GDPR)
- 2.3. Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Info Act)

### 3. Rules for data processing

- 3.1. General Data Protection Officer: Sinkó, Alexandra financial manager
- 3.2. This Privacy Policy is valid from 16 February 2022 until its withdrawal.
- 3.3. The Managing Director of qsd2 Ltd. determines the organisation of data protection, the tasks and competences related to data protection and related activities, and designates the person responsible for the supervision of data processing, taking into account the specificities of qsd2 Ltd.
- 3.4. The content of the concepts defined in the DPPP is identical to the content of the explanatory definitions defined in Section 3 of the Info Act.
- 3.5. qsd2 Ltd. processes personal data only with the prior consent of the data subject or on the basis of a legal requirement.
- 3.6. qsd2 Ltd. as the operator of the website [www.qsd2.com](http://www.qsd2.com) (hereinafter: Website) informs the visitors of the Website that the Website uses anonymous user identifiers, so-called "cookies" (hereinafter: Cookies) for the purpose of personalized service.
  - 3.6.1. Cookies are a series of signals or information files that are placed on a user's computer by service providers to allow a website to record information about a user's browsing habits (for example, to store a user's preferences and settings; to help with login; to display personalised ads and to analyse the performance of the website).
  - 3.6.2. However, the sequence of signals stored in the cookies is only capable of recognising

the user's computer, it is not able to identify the user individually, so no data processing is carried out within the scope of the Info Act.

3.6.3. In the case of the contact option provided on the Website, the Website will process data only on the basis of the provisions of this DPPP.

3.7. The DPPP of qsd2 Ltd. has been prepared on the basis of the Data Protection and Privacy Policy of qsd2 Ltd., its scope covers all processes carried out during the operation of the Website, during which the processing of personal data as defined in Section 3, point 2 of the Info Act is carried out.

3.8. qsd2 Ltd. declares that it only processes personal data in order to exercise a right or fulfil a legal obligation. The personal data processed will not be used for private purposes, and the processing will at all times comply with the purpose limitation principle - if the purpose of the processing ceases to exist or the processing is otherwise unlawful, the data will be deleted.

3.9. The employees of qsd2 Ltd. are obliged to keep the personal data they receive as business secrets, guaranteed by the "Business Secrets Policy" of qsd2 Ltd. and the "Confidentiality Statement" signed by the employees.

3.10. The employees of qsd2 Ltd. ensure that no unauthorized persons have access to personal data in the course of their work. Personal data are stored in such a way that they cannot be accessed, recognized, altered or used by unauthorised persons.

#### 4. Data processing during the use of the Website of qsd2 Ltd.

##### 4.1. Place of data processing

Headquarters of qsd2 Ltd: H-9028 Győr, Serfőződombi dűlő 3.

##### 4.2. Data processing on the Website

4.2.1. Personal data (name, e-mail address) is provided by the user of the Website only when contacting qsd2 Ltd. through the contact form provided on the Website.

4.2.2. Website of qsd2 Ltd. is public, accessible to anyone without revealing their identity or revealing their personal data, and information on the Website and on the pages linked to it may be freely obtained without restriction.

4.2.3. qsd2 Ltd. uses the Google Analytics web analytics service on the Website. The purpose of Google Analytics is to help analyse the use of the Website, and information about the use of the Website (e.g. the IP address of the Website user) is transmitted to and stored by Google on servers in the United States of America.

4.2.4. Google will use this information for the purpose of evaluating and analysing your use of the Website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

4.2.5. Google and other search engines do not associate the information generated by "cookies" with any other data - therefore, they do not process personal data under the applicable data protection legislation.

4.2.6. By using the Website, you consent to the processing of your data in the manner and for the purposes set out above.



#### 4.3. Contacting qsd2 Ltd.

- 4.3.1. On the Website of qsd2 Ltd. the user has the possibility to contact qsd2 Ltd.
- 4.3.2. By filling in a form, you can provide the relevant information needed to contact you. However, the data can only be sent if the data subject accepts the DPPP of qsd2 Ltd. by ticking a box, otherwise he/she will not be able to send the message.

### 5. Legal basis for data processing

- 5.1. The legal basis for the processing of data when using Cookies is the voluntary consent of the data subject, given by the data subject through active behaviour by clicking on the "Accept" button when short information about the use of Cookies is displayed. Enabling Cookies is not strictly necessary for the functioning of the Website, but it improves the browsing experience and performance. You may delete or disable these Cookies yourself, but in this case certain features of the Website may not function as intended.
- 5.2. The duration of data processing when using Cookies varies, and the user can delete Cookies from his/her computer or disable the Cookies application in his/her browser.
- 5.3. Legal basis for data processing is the data subject's consent in accordance with the Info Act 5, "Legal basis and general conditions for processing". The legal basis is also Section 6(1)(a) of the EU Regulation 2016/679 (hereinafter: GDPR).
- 5.4. Purpose of data processing: to facilitate contact with qsd2 Ltd.
- 5.5. Scope of data processed: company name/name; e-mail address; subject; message text
- 5.6. Time limit for data storage: until the contact case is settled (until the purpose is achieved).
- 5.7. Method of data storage: electronic.

### 6. Enforcement of data subjects' rights

- 6.1. A natural person who can be directly or indirectly identified on the basis of personal data may request information about the processing of his or her personal data, as well as the rectification or - with the exception of processing required by law - the erasure of personal data or the transfer of data to third parties, pursuant to Chapter III. of the GDPR, at the central contact details of qsd2 Ltd. ([service.qsd@gmail.com](mailto:service.qsd@gmail.com))
- 6.2. qsd2 Ltd. shall respond in writing and in an intelligible form to any request received in relation to the processing of personal data of the data subject within 25 days of receipt at the latest, or 10 days in case of exercising the right to object.
- 6.3. The information shall include the information specified in Section 15 (1) of the Info Act, unless the data subject may be denied the information by law.
- 6.4. As a general rule, the information is free of charge, however, qsd2 Ltd. may request the reimbursement of its costs pursuant to Section 15 (3) b) of the Info Act.
- 6.5. qsd2 Ltd. may reject a request submitted by the data subject only for the reasons specified in the Info Act, with reasons and with the information specified in the Info Act, in writing.
- 6.6. For the duration of the examination of the data subject's objection to the processing of his or her personal data, which is 15 days from the date of the request, the head of the department responsible for data processing shall suspend the processing of the data in accordance with Section 21 (2) of the Info Act - for a maximum of 5 days -, examine the validity of the objection and take a decision, which shall be notified to the applicant without

delay.

- 6.7. If the objection is justified, the head of the department handling the data shall act in accordance with the provisions of Section 21 (3) of the Info Act.
- 6.8. qsd2 Ltd. shall compensate for any damage caused to others by the unlawful processing of the data subject's data or by the breach of data security requirements, as well as for any damage fees in the event of a personal data breach caused by qsd2 Ltd. or its data processor. However, qsd2 Ltd. shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that the damage or the infringement of the data subject's personality rights was caused by an unavoidable cause outside the scope of the data processing. Likewise, it shall not compensate the damage if it was caused by the intentional or grossly negligent conduct of the aggrieved party.
- 6.9. The data subject may lodge a complaint about the data processing procedures of qsd2 Ltd. with the National Authority for Data Protection and Freedom of Information (NAIH): [www.naih.hu](http://www.naih.hu)

Official name:	National Authority for Data Protection and Freedom of Information
HQ:	1055 Budapest, Falk Miksa utca 9-11.
Postal address:	1363 Budapest, Pf.: 9.
Phone number:	+36 (1) 391-1410
Fax number:	+36 (1) 391-1410
Central e-mail address:	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
URL of the website:	<a href="http://www.naih.hu">http://www.naih.hu</a>
Official gateway:	rövid név: NAIH, KRID: 429616918
Contact details for customer service or public relations:	National Authority for Data Protection and Freedom of Information Customer Service
Phone number:	+36 (1) 391-1410
Fax number:	+36 (1) 391-1410
Address:	1055 Budapest, Falk Miksa utca 9-11.
Postal address:	1363 Budapest, Pf.: 9.
Online administration:	<a href="https://naih.hu/online-ugyinditas">https://naih.hu/online-ugyinditas</a>
Authority's Data Protection Officer:	dr. Kiss Attila (Mr.)
Phone number:	+36 (1) 391-1470
E-mail address:	<a href="mailto:dpo@naih.hu">dpo@naih.hu</a>

## 7. Issues not covered by this DPPP

- 7.1. In matters not specified here, rules of the Info Act and the GDPR shall apply.