

E-track Monitoring Kft. (registered office: 1173 Budapest Pesti u. 237; company registration number: 01-09-308974; tax number: 26228505-2-42; hereinafter: Service Provider) at www.e-track.eu operation of the website (hereinafter referred to as the "Website"), it processes the data of visitors to the Website, users using the Website and ordering the product available on the Website (hereinafter collectively: Data Subject).

In connection with the processing of the data, the Service Provider hereby informs the Data Subjects about the personal data processed by it on the Website, its principles and practices in the scope of the processing of personal data, as well as the manner and possibilities of exercising the rights of data subjects.

The Data Subject accepts the contents of this Data Management Notice by using the Website, by ticking a checkbox that accepts separately in case of purchase (order) and consents to the data processing specified below.

The Service Provider expressly draws attention to the fact that the subject of this Data Management Notice is the processing of personal data processed exclusively by it on the Website; the rules for data processing in the performance of toll reporting and fleet tracking services provided by the Service Provider are contained in the relevant regulations (GTC) and/or individual contracts.

1. Definitions

- Data subject: any natural person identified or identified, directly or indirectly, on the basis of specific personal data;
- Personal data: data relating to the Data Subject, in particular the name, identification mark and knowledge of one or more physical, physiological, mental, economic, cultural or social identities of the Data Subject, as well as the inference that can be drawn from the data concerning the Data Subject;
- consent: a voluntary and firm declaration of the will of the Data Subject, based on appropriate information and with which he gives his unambiguous consent to the processing of personal data relating to him, either in full or in certain operations;
- objection: a statement by the Data Subject objecting to the processing of his personal data and requesting the termination of the data processing or the deletion of the processed data;
- 'controller' means a natural or legal person or an unincorporated entity which, independently or together with others, determines the purpose for which the data is processed, makes and implements decisions relating to the processing of data (including the device used), or enforces it with a processor entrusted by it;
- processing: any operation or set of operations carried out on the data, irrespective of the procedure used, in particular the collection, recording, recording, systematisation, storage, alteration, use, query, transmission, disclosure, coordination or interconnection, blocking, erasure and destruction of the data, as well as the prevention of the re-use of the data, taking photographs, audio or video recordings and taking physical identification of the person recording of characteristics (e.g. finger or palm print, DNA sample, iris image);
- data processing: the performance of technical tasks related to data processing operations, irrespective of the method and means used to carry out the operations and the location of the application, provided that the technical task is carried out on the data;

- 'data processor' means a natural or legal person or an unincorporated entity that processes data under its contract with the controller, including the conclusion of a contract under the provisions of the law;
- data transfer: making the data available to a specific third party;
- disclosure: making the data available to anyone;
- data erasure: making the data unrecognizable in such a way that its recovery is no longer possible;
- 'data sealing' means the identification of the data with a view to limiting the further processing of the data for a definitive or specified period of time;
- data destruction: complete physical destruction of the data medium;
- third party: a natural or legal person or an unincorporated entity that is not the data subject, the controller or the data processor.

2. Purpose of data processing

The Service Provider stores and processes the data provided by the Data Subject in a purpose-bound manner, solely for the purpose of providing the service available on the Website, for contacting and identifying the user.

The purpose of the automatically recorded data is to create statistics and to improve the IT system.

The Service Provider does not use or use the personal data provided for purposes other than those specified above. The disclosure of personal data to third parties or authorities, unless otherwise required by law, is possible with the prior explicit consent of the Data Subject.

In all cases where the Service Provider wishes to use the data provided for purposes other than the purpose for which the original data was collected, it shall inform the Data Subject there there and obtain his prior explicit consent or give him the possibility to prohibit the use.

3. Legal basis for data processing

Act CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter: Info. tv.) for data processing by the Service Provider According to Section 5 (1) (a) it is carried out on the basis of the voluntary consent of the Data Subject and on the basis of Act CVIII of 2001 on certain aspects of e-commerce services and information society services.

The Service Provider does not check the personal data provided to it and their authenticity. Only the person, data subject and contractor who provided it is responsible for the adequacy of the data provided.

4. Name of the Service Provider as data controller

- Name:e-track Monitoring Kft.
- Seat:1173 Budapest, Pesti út 237.
- Mailing address: 1173 Budapest, Pesti út 237.
- Registration Number: 01-09-308974
- Name of registration court: Municipal Court of Budapest
- Tax number: 26228505-2-42

- Community tax number: HU 26228505
- Email address: help@e-track.eu
- Phone number: +36 1 8838836

5. Duration of data processing

5.1. Information provided during ordering

The processing of the personal data required during the ordering process will continue until the Data Subject requests their deletion. The data can be deleted at any time, after the request for deletion (by post, email) has been sent. In this case, the deadline for erasure of the data is 5 working days after receipt of the request.

5.2. Technical data

The logged data is stored for 10 years from the date of the log, with the exception of the date of the last visit, which is automatically overwritten.

6. Scope of personal data processed

6.1. Technical data

The data of the data subject's login computer, which are generated during the use of the service and which are recorded by the Service Provider's system as an automatic result of technical processes. These are in particular the date and time of the visit, the IP address of the data subject's computer, the type of browser, the address of the website viewed and previously visited.

The data that is automatically recorded is automatically logged at the time of entry or exit without any specific statement or action of the Data Subject. This data cannot be linked to other user data, except in cases made mandatory by law. Only the service provider has access to the data.

The Service Provider may collect data on the activity of the Data Subjects, which cannot be linked to other data provided by the Data Subject during the ordering process, nor to data generated when using other websites or services.

The html code of the Website may contain links to an external server independent of the www.e-track.eu page. The providers of these links are able to collect user data due to direct connection to their server. External servers help independently measure and audit website visits and other web analytics data (Google Analytics). Data controllers can provide detailed information to the Data Subject about the processing of measurement data. Contact details: www.google.com/analytics/.

6.3. Cookies

The Service Provider and the designated external service providers place and read back a small data package, called cookies, on the Data Subject's computer in order to provide customized service. If the browser returns a previously saved cookie, the service provider managing the cookie has the possibility to link the data saved during the data subject's current

visits to the previous ones, but only in the form of his own content. The "Help" function in the menu bar of most browsers provides information that the Data Subject has access to his or her own browser

- How to disable cookies,
- How to accept new cookies,
- how to instruct your browser to set a new cookie, or
- how to turn off other cookies.

If the Data Subject does not want Google Analytics to measure the above data in the manner and for the purpose described, install the blocking add-on in his browser.

7. Scope of persons familiar with the data, data transmission, data processing

The data are primarily entitled to be known by the Service Provider or the Service Provider's internal staff, but they are not published, they are not handed over to third parties without the consent of the Data Subject.

The Service Provider does not use third parties as data processors.

In addition to the above, the transfer of personal data relating to the Data Subject may only take place in cases mandatory by law or on the basis of the consent of the Data Subject.

8. User rights and enforcement options

8.1. Right to information

The Data Subject is entitled at any time to request information about the personal data processed by the Service Provider concerning the Data Subject. At the request of the Data Subject, the Service Provider shall provide information about the data it handles, the purpose, legal basis and duration of the data processing, as well as who received or received its data and for what purpose. The Service Provider shall provide the requested information in writing within 30 days of the submission of the request. The Data Subject may contact the Service Provider's employee with any questions or comments related to data management through the contact details indicated in section 8.3.

8.2. The Data Subject may request the deletion, correction and blocking of his data

The Data Subject is entitled at any time to request the correction or deletion of incorrectly recorded data at one of the contact details indicated below. The Service Provider deletes the data within 5 working days of receiving the request, in which case they will not be recoverable. The deletion does not apply to data processing required under the law (e.g. accounting regulations), they are retained by the Service Provider for the necessary period of time.

The Data Subject may also request that his data be blocked. The Service Provider locks the personal data if the Data Subject requests it, or if it can be assumed from the information available to it that the deletion would harm the legitimate interests of the Data Subject. The personal data thus blocked can only be processed as long as the purpose of data processing exists, which excluded the deletion of the personal data.

The Data Subject must be notified of the correction, blocking and deletion, as well as all those to whom the data was previously transmitted for the purpose of data processing. The notification may be waived if this does not prejudice the legitimate interest of the Data Subject in view of the purpose of data processing.

If the data controller fails to comply with the Data Subject's request for correction, blocking or deletion, he/she shall communicate in writing the factual and legal reasons for rejecting the request for correction, blocking or deletion within 30 days of receipt of the request.

8.3. The Data Subject may object to the processing of his personal data

The Data Subject may object to the processing of his personal data. The Service Provider examines the objection as soon as possible, but within a maximum of 15 days from the submission of the application, makes a decision on its merits and informs the applicant of its decision in writing.

The Data Subject may exercise his rights at the following contact details:

- Name: e-track Monitoring Kft.
- Seat: 1173 Budapest, Pesti út 237.
- Mailing address: 1173 Budapest, Pesti út 237.
- Registration Number: 01-09-308974
- Name of registration court: Municipal Court of Budapest
- Tax number: 26228505-2-42
- Community TAX NUMBER: HU26228505
- Email address: help@e-track.eu
- Phone number: +36 1 8838836

8.4. Data Subject under Info.tv and the Civil Code (Act V of 2013)

1. You can contact the National Authority for Data Protection and Freedom of Information (Budapest 1125, Erzsébet Szilágyi fasor 22/c.; www.naih.hu) or 2. You can enforce your rights in court.

If the Data Subject has provided third-party data for the use of the service or has caused any damage during the use of the Website, the Service Provider is entitled to claim damages against the Data Subject. In such a case, the Service Provider will provide all possible assistance to the determining authorities in order to establish the identity of the infringing person.

9. Use of email addresses

The Service Provider pays special attention to the legality of the use of the e-mail addresses it manages, so it uses them only in the manner specified below (information or advertising) to send e-mail. The management of e-mail addresses primarily serves the identification of the Data Subject and the contact during the use of the service, so e-mail is sent for this purpose.

10. Data security

The Service Provider undertakes to ensure the security of the data, to take the technical measures that ensure that the data collected, stored or processed are protected, and to do everything possible to prevent their destruction, unauthorized use and unauthorized alteration. It also undertakes to call upon all third parties to whom the data may be transmitted or transferred to fulfil its obligations in this regard.

11. Other provisions

The Service Provider reserves the right to unilaterally modify this Data Management Notice in addition to prior notification to data subjects through the internal mailing system. The amendment shall enter into force on the 30th day following notification. After the entry into force of the amendment, the Data Subject accepts the provisions of the amended Data Management Notice by using the Website. This Privacy Policy is from 1 January 2021. Valid from 10.15. This Privacy Policy is available and [www. e-track.eu/dokumentumok](http://www.e-track.eu/dokumentumok)