

Privacy Policy

The purpose of this Privacy Policy is to provide users (hereinafter referred to as "**User(s)**" or "**Data Subject(s)**") of the website accessible at www.chainyacc.com url addresses (hereinafter referred to as the "**Website**") with information about the facts and information related to the processing of data on the Website prior to the start of the processing.

The provision of personal data is not required to visit the Website, however, certain services of the Website may only be used after the User has provided his/her personal data.

Please be informed that the personal data provided by you will be handled confidentially by **ChainyAcc Kft.** (registered office: Hungary, 4025 Debrecen, Simonffy utca 4-6. Fsz. 41. ajtó; registration number: 01-09-400503; tax number: 27850444-2-43; representative: Tamas Toth CEO; hereinafter referred to as "**Data Controller**") in accordance with the applicable data protection legislation and the provisions of this privacy policy.

This Privacy Policy is solely related to the online activities of ChainyAcc Kft. and the services provided through its online platforms, such as the Website, and the ChainyAcc Facebook, Instagram, Youtube, TikTok, LinkedIn, Discord, Twitter channels. The Privacy Policy does not cover the data management processes related to other commercial activities of the Data Controller.

Data Controller reserves the right to update and modify this Privacy Policy from time to time in order to ensure that the terms and conditions set out herein always reflect the current way in which personal data are processed and to ensure that they comply with all applicable legal obligations. If any of the provisions of this privacy policy should be changed as described above, Data Controller will publish the amended version of the Privacy Policy on its website, so please check the current content of this Privacy Policy from time to time.

I. Definitions

"User" means a natural or legal person who accesses the content of www.chainyacc.com, i.e. the content of the Website.

"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, 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;

"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;

"controller" means a natural or legal person, public authority, agency or any 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 the processing are determined by EU or member state law, the controller or the specific criteria for the designation of the controller may also be determined by EU or member state law;

"data processor" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Data Controller;

“recipient” means a natural or legal person, public authority, agency or any other body to whom or with which 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 EU 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;

“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;

“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.

II. Personal data processing on the Website

II.1. Website visitor’s data - server log files

During the use of the Website data are recorded in the log-file, and such data are stored and used exclusively for technical purposes (analysis of the secure operation of servers, post-checking, detection, prevention and investigation of attacks against the Website) and for statistical purposes. For these purposes, the internet service provider of the Website automatically records and saves information in so-called Server-Log-Files, which are automatically transmitted to us by your browser. This concerns your IP address, your browser and language settings, as well as your operating system, your internet service provider, date/time settings and the URLs of the current and last visited websites. The data series obtained this way will not be linked by the Data Controller with personally identifiable information from other sources. In case we become aware of specific suspicions of unlawful use of the Website, we reserve the right to evaluate these data retrospectively.

Data processing period: 30 days. Beyond this period, the data will only be stored if necessary for the investigation of detected attacks against the Website.

Legal basis for processing: legitimate interest of the Data Controller (to achieve the purposes listed above).

II.2. Subscribe to beta

Users have the possibility to subscribe to our beta by filling in the online form when using the website. The completion of the form is voluntary.

The processed Personal Data:

- Name
- E-mail address

Purpose of data processing: Data Controller’s possibility to contact the requester for sales offers.

Legal basis for processing: voluntary consent of the Data Subject.

Data processing period: until the Data Subject's request, but no longer than 3 years from the date of the data provision. In the case of a user account, until the account is not deleted.

The data may be processed by the Controller and its sales and marketing staff, in compliance with the above principles.

III. Personal data processing for marketing communication purposes

III.1. Newsletter

Users have the possibility to subscribe to the Controller's newsletter on the Website. Subscription to the newsletter is a voluntary act. By subscribing, the User expressly consents to receive informative and marketing content to the e-mail address provided by the User. The User may unsubscribe from the newsletter at any time by clicking on the corresponding link.

The processed personal data:

- Name
- E-mail address

Purpose of data processing: The Controller offering services, forwarding advertisements, new information, promotions, and new features via email.

Legal basis for processing: The legal basis for processing is the express consent of the Data Subject, which is given by ticking the box next to the text "I subscribe to the newsletter" on the website's newsletter subscription form and the request for offer or the contact form, after the information on the processing of his/her data.

Duration of data processing: until the Data Subject unsubscribes from the newsletter, but no longer than 3 years from the date the Data Subject provided the data.

The data may be processed by the controller and its sales and marketing staff, in compliance with the principles set out above.

IV. Protection of legitimate business interest

There may be circumstances where the Data Controller needs to transfer certain information in order to protect its own rights, business interests and its commercial activities. Such circumstances may include, but are not limited to:

- protection and other precautions against cyber-attacks that threaten the security of the users of the Website;
- measures to prevent and detect possible fraud attempts, including the transmission of relevant information to the competent authorities and public authorities;
- measures to address any additional risks.

The authorisation for the types of processing described above is based on our legitimate business interest to protect the commercial activities of the Data Controller. The Data Controller shall ensure at all times that the measures it takes or intends to take are proportionate and balanced between the interests of the Data Controller and the fundamental rights of the Data Subject.

Furthermore, the processing of the data is in certain cases required by law, in particular to safeguard the principles and values required by the applicable law in the context of the transaction in question.

V. Cookies' management on the Website

In order for a properly functioning Website, we might need to place data files called "cookies" on the User's computer, as other major websites and Internet service providers do.

Cookies are small text files that the Website stores on the computer or mobile device of the User visiting its pages. Cookies allow the Website to remember the User's actions and personal preferences (such as your username, language, font size and other unique settings related to the website's display) for a certain period of time, so that case the User do not have to re-enter them each time you visit our website or navigate from one page to another.

When the User visit the Website, the following types of cookies are used:

Session-cookies

These cookies are necessary for navigation on the Website. Examples include cookies that allow you to log in to the customer page or to add products to your shopping cart. These cookies will be reset after 30 minutes or deleted after the User leave the site. Cookies used to log in or make a purchase will be deleted after 30 minutes.

Persistent cookies

These cookies are used to ensure that the User's browser is recognised the next time he/she visits our website. These cookies are stored on your computer until the User manually delete them.

Performance cookies

These cookies are used to collect anonymous information about the User's usage of our Website. These cookies register the subpages and links the User has visited. This allows us for a better manage the User's preferences the next time he/she visits our Website. This allows us to provide the User with interesting information and offers. This data is stored for 30 days.

Functionality - Cookies

These cookies are used to store the preferences (such as language settings or font size settings) that the User has set on our Website. This improves the functionality of our Website for the User's convenience. These cookies will be deleted after 30 minutes.

Third-party cookies

These cookies are used to collect anonymous information about User's usage patterns on the Website and other websites. This allows us to better manage the User's preferences the next time he/she visits our website. This allows us to provide the User with interesting information and offers.

We also use third-party cookies for Google Analytics, Hubspot, Hotjar, Polyfill, BingAds and GoogleAds, about which the User will find more information below:

Google Analytics

This Website uses Google (Universal) Analytics, a web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses cookies to analyse the use of the Website.

The information generated by the cookie about the User's usage of the Website (including your IP address and the URLs of the websites you visit) will be transmitted to and stored by Google on servers in the United States. By activating IP anonymisation on this Website, the IP address will be shortened before being transmitted within the member states of the European Union or to other contracting states of the treaty establishing the European Economic Community. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA, where it will be shortened. Google will use this information for our purposes in order to evaluate your use of our website, to compile reports on website activity and to provide other services relating to website activity and internet usage. The anonymous IP address transmitted by Google Analytics from the User's browser will not be merged with other Google data. This data will be stored for 6 months.

We do not store data collected by Google Analytics.

Users can prevent the collection of data generated by cookies about his/her use of this Website (including your IP address) for Google and the processing of this data by Google by downloading and installing the Browser-Plugin available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>

Detailed information on Google's terms of use and privacy policy can be found at <http://www.google.com/analytics/terms/> and <https://www.google.at/intl/at/policies/> respectively.

Our legal basis for the use of cookies is your consent and our legitimate interest in achieving the purposes stated for each type of cookie.

HotJar

The Website uses analytics software provided by Hotjar Ltd ("Hotjar") (<http://www.hotjar.com>), Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta, Europe. Hotjar allows us to measure and evaluate user behaviour (clicks, mouse movements, scrolls, etc.) on the Website. The information generated by the "Tracking Code" and cookies on the Website about the Users visit is transmitted to the Hotjar server in Ireland where it is stored. The following (anonymous) information is collected by the Tracking Code: Users device screen size, device type and browser information, geographic location (country only), preferred language, how the Website is displayed, user interactions, mouse actions (movement, position and clicks), keyboard activity and log data.

These cookies are deleted after 365 days.

We do not store HotJar information.

Users can only prevent the storage of HotJar cookies by setting their browser to the appropriate settings, and for this Users must run their browser in a private/incognito window. More detailed information on Hotjar's terms of use and privacy policy can be found at <https://www.hotjar.com/legal/policies/privacy>.

The legal basis for our use of cookies is the User's consent and our legitimate interest in achieving the purposes specified for each type of cookie.

Google Ads

Google AdWords is a service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google AdWords uses cookies. If a User reached the Website through a Google ad, Google AdWords will place a cookie on their terminal. This is a pseudonymous identification number (ID), which enables us and Google to recognise that someone has clicked on the ad and thus reached the Website. Anonymised statistics can be generated about this. The use of AdWords cookies allows Google and us to place ads more accurately based on an evaluation of the User's previous visits to the Website and other websites.

These cookies will be deleted after 30 days.

The information generated by the cookies (including IP addresses) is transmitted by Google to a server in the USA for evaluation and storage. Google complies with the data protection provisions of the Privacy Shield and is a registered member of the US Department of Commerce's Privacy Shield program. Google will only transfer data to third parties where required to do so by law or in the course of processing orders. If the User access the site using a Google Account, Google will link their account information to the information which was processed in AdWords.

Users can prevent the storage of Google AdWords cookies not only by setting their browser to prevent this, but also by clicking on the following link (<https://myaccount.google.com/intro/privacycheckup>) if the User has logged in with his/her Google account. If the User is not signed in with his/her Google Account, he/she can change in their browser settings.

Detailed information on Google's terms of use and privacy policy can be found at <https://policies.google.com/privacy>.

Facebook

More information about Facebook cookies:

<https://hu-hu.facebook.com/policies/cookies/#>

These cookies will be deleted after 90 days.

These services are provided by Facebook Inc.

The legal basis for our use of cookies is the User's consent and our legitimate interest in achieving the purposes specified for each type of cookie.

Cookie maintenance

Users have the option to maintain and/or delete cookies at their discretion. On aboutcookies.org website Users can find information about it. Users can delete all cookies stored on their computer and disable their installation in most browsers, i.e. Users can configure their browser to prevent the installation of a unique identifier on their computer (usually in the Tools menu under Settings/Internet Settings, depending on the browser). In this case, however, Users may have to manually configure certain settings each time they visit a particular page and you may also be faced with the possibility that certain services and features may not work (for example, in the case of customised solutions), and that User may not be able to use certain features of the service to the fullest extent.

VI. Data transmission

The Data Controller may transfer the User's personal data for the purposes set out above and the following data processors may therefore have access to the User's personal data:

1. Data processor involved for a hosting & CRM service

- The name and contact details of the data processor: Hubspot Inc.
- Address of the data processor: 25 First Street, 2nd Floor, Cambridge, MA 02141, United States
- Tax number of the data processor: -
- Data Processing activity involved: hosting service

2. Data processor used for invoicing

- Name and contact details of the data processor: Számlázz.hu (KBOSS.hu Kft.)
- Address of the data processor: 1031 Budapest, Záhony utca 7/D, Hungary.
- Tax number of the data processor: 13421739-2-41
- Data Processing activity involved: CRM service

The courier service will assist in the delivery of the ordered goods on the basis of a contract with the Controller. The courier service will process the personal data received in accordance with the Privacy Policy available on its website.

5. Miscellaneous

In order to comply with a legal obligation and/or to protect a legitimate economic interest, the Controller may disclose certain personal data to public authorities.

The Data Controller fully guarantees that a private body identified as a third party may access your data only in full compliance with the legal provisions on data protection, information security and confidentiality, and only to the extent contractually agreed with such body.

We store and process your personal data within the European Union and the European Economic Area (EEA).

VII. Data security

The Data Controller and the data processors shall keep the provided personal data confidential and shall comply with the applicable data protection legislation, in particular the Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, the Law on the Protection of Individuals with regard to Automatic Processing of Personal Data, and the 1981. Act VI of 1998 on the proclamation of the Convention for the Protection of Individuals with regard to the Processing of Personal Data by Machine, signed at Strasbourg on 28 January 1998, and the provisions of EU Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (GDPR).

The Data Controller shall take or ensure all IT and other measures to facilitate secure data storage, processing and transmission in order to ensure secure data handling. The Data Controller shall take the necessary measures to protect the personal data it processes against unauthorised access, alteration, disclosure, deletion, damage or destruction, and to ensure the necessary technical conditions for this purpose.

Persons entitled to access the personal data: The personal data provided by Users may be accessed only by the employees and agents of the Data Controller and its processors who need to know such data in order to perform their tasks.

VIII. Rights of 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:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) 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 organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (e) 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;
- (f) the right to lodge a complaint with a supervisory authority;
- (g) where the personal data are not collected from the data subject, any available information as to their source;
- (h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The Data Controller shall provide a copy of the personal data undergoing processing.

The Data Subject has the right to request the rectification, and have the right to have incomplete personal data completed of inaccurate personal data at any time, which the Data Controller shall comply with without undue delay, but no later than within 1 month, unless the request is particularly complex or if several requests are sent at the same time, in which case the time limit shall be no longer than 3 months.

The Data Subject shall have the right to withdraw his/her consent at any time. The Data Subject withdraws his/her consent if he/she unsubscribes from the newsletter by clicking on the appropriate link or by sending his/her request to unsubscribe to the Controller. If the Data Subject unsubscribe from the newsletter, the Controller shall delete your personal data from its records within 30 days of the date of unsubscription.

The Data Subject may withdraw his/her consent to the storage of cookies as set out in the section " Cookies' management on the Website".

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

The Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him/her without undue delay and the controller 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;
- where the processing of personal data is carried out for direct marketing purposes and 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 Data Controller is subject;

Where the Data Controller has made the personal data public and is obliged pursuant to this point to erase the personal data, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform the further data controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The above paragraphs shall not apply to the extent that processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by EU 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 Data Controller;
- (c) for reasons of public interest in the area of public health;
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes as it is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (e) for the establishment, exercise or defence of legal claims.

The Data Subject shall have the right to obtain from the Data Controller 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 Data 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 Data 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 defence of legal claims;
- the Data Subject has objected to processing for direct marketing purposes pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.

Where processing has been restricted because of the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence 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 EU or of a member State. A Data Subject who has obtained restriction of processing pursuant to the above shall be informed by the controller before the restriction of processing is lifted.

The Data Subject shall have the right to receive the personal data concerning him/her, which he/she has provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, and the Data Subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The request can be sent to the following e-mail address: info@chainyacc.com

For identification purposes, accurate personal data is always required.

The Data Controller shall provide information on action taken on a request to the Data Subject without undue delay and in any event within 30 days of receipt of the request.

Where the Data Subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed.

If the Data Controller does not take action on the request of the Data Subject, the controller shall inform the Data Subject without delay and at the latest within 30 days of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Data Subject is also entitled to object to the processing of her personal data at any time for reasons related to her own situation, in the case of data processing based on legitimate interests. The Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override

the interests, rights and freedoms of the Data Subject or it demonstrates compelling legitimate grounds for the establishment, exercise or defence of legal claims.

The Data Controller shall examine the objection, with simultaneous suspension of processing, within the shortest possible time from the date of the request, but not longer than 30 days, and shall inform the Data Subject in writing of the outcome. If the Data Subject's objection is justified, the Data Controller shall cease the processing, including further collection and further transmission, and restrict the data, and shall notify the objection and the action taken on the basis of the objection to all those to whom the personal data concerned by the objection have been previously disclosed and who are obliged to take measures to enforce the right to object.

In the event of a breach of the above rights, the Data Subject may apply to the courts or the National Authority for Data Protection and Freedom of Information.

Hungarian National Authority for Data Protection and Freedom of Information

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Website: <http://www.naih.hu>

E-mail: ugyfelszolgalat@naih.hu

The Data Controller reserves the right to unilaterally modify this privacy policy with prior notice to Users. By using the service after the amendment has entered into force, the User accepts the amended Privacy Policy.

10 March 2023, Debrecen