

## **Data management information**

### **1. Name and contact details of the controller:**

For the click4skill.hu domain:

Name: MobilPort Ltd.

Registered address: 1152 Budapest, Telek str. 7-9.

Tax number: 14991895-2-42

Company registration No.: 01 09 172437

Telephone number: +36 (1) 271-1141

E-mail address: info@click4skill.com

### **2. Legal background, legal basis and purpose of data processing carried out on the website, personal data processed, scope and duration of data processing**

The Data Controller informs its Users that -under the internet site family domain it operates - for measuring the attendance and monitoring the behaviour of the visitors, for making statistics and promoting the efficiency of the advertisements - Google Analytics, Google Remarketing, AdWords Conversion Tracking and Facebook Remarketing programs.

The referenced programs place cookies on the user's computer, which collect data. Visitors to the website (Users) allow the Data Controller to use

Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing programs. At the same time they also give consent for the Data Controller to monitoring, tracking of their users' behaviour and using of all services provided by the programs. In addition, the user has the opportunity at any time to disable recording by the cookies and store data for the future as follows: We inform our users that settings and use of Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing programs are in full compliance with the requirements of the data protection authority.

According to Google's information, Google Analytics reports of visitor's interactions at its website mainly by using first-party cookies

. These cookies record only information unsuitable for personal identification

. Browsers do not share their own cookies between the domains

#### **Google Analytics:**

The Data Controller uses Google Analytics primarily to generate its statistics, among others for to measure the effectiveness of your campaigns. Using the program, the Data Controller mainly gets information about how many visitors have visited your Website and how much time they have spent on the Website. The program recognizes the visitor's IP address, so it can track whether the visitor is a returning or a new visitor, and the path of the visitor on the Website and entries can be followed.

#### **Google Remarketing:**

The Data Controller uses the Google Remarketing Program to collect - in addition to the usual data of Google Analytics also the DoubleClick cookie data. The DoubleClick cookie allows you to use the remarketing service, which primarily ensures that visitors to the Website will later meet the advertisement of the Data Controller on free Google ad interfaces. The Data Controller utilizes the Google Remarketing program for the online advertisements. The Data Controller utilizes the Google

Remarketing program for the online advertisements. The advertisements of the Data Controller are displayed on the internet websites - e.g. Google - by the external service providers.

The Data Controller and the External service providers such as Google, use their own cookies (e.g. Google Analytics cookies) and third party cookies (such as DoubleClick cookies) together to get information based on previous visits to the Website, as well as for optimization and display of advertisements.

#### **Google AdWords conversion tracking:**

Google AdWords conversion tracking is designed to allow Data Controller to measure the efficiency of AdWords ads. This is done by means of cookies placed on the User's computer, existing for 30 days and do not collecting personal data.

#### **Facebook Remarketing:**

Data Controller uses Facebook's remarketing pixel to improve the effectiveness of Facebook ads for the purpose of building a so-called remarketing list. Thus, after visiting the Website, the external service provider, such as Facebook, can display ads on Internet sites. The remarketing lists are not suitable for personal identification. They do not include the personal data of the visitor they only identify the browser software.

### *2.1. Information about the use of cookies*

#### *About cookies:*

The Data Controller uses so-called cookies when visiting the website. The cookie is a package of information consisting of letters and numbers, sent by our website to your browser in order to save some of your settings, to facilitate the use of our website and to contribute to collecting some relevant statistical information about our visitors.

#### *The legal background and legal basis of cookies:*

The background of data processing is based on the act 112th of 2011 (Info act) about the right of informational self-determination and freedom of information as well as the provisions of Act 108 of 2001 about certain aspects of the Electronic Commerce Services, as well as, of the issues related to the information society. The legal basis for data processing in compliance with point (a) §. (1) of the Info act is your consent.

#### *The main features of the cookies used by the website are:*

In order to provide customized service, the Company places a small data package on the User's computer (so-called "cookie"). The purpose of the cookie is to ensure that the site works as the possible highest level to improve your user experience. By visiting the website and using its individual functions, you give your consent to storing of these cookies on your computer and be accessed by the Data Controller. Cookies are stored, as a rule, for 30 days but you can also use the browser program to set and prevent the activities related to the cookies. However, please note that in the latter case, without using cookies you may not be able to use all of the services of this website.

#### *Disabling Cookies*

If you want to manage or disable the cookie settings, you can do it in your browser, from your computer. This option is located - depending on the browser – toolbar in the Cookies/Tracking Function settings, but in general the Tools > Settings > Privacy settings allow you to set which tracking features you enable/disable on your computer.

Users who do not want Google Analytics to report their visit may install the Google Analytics opt-out browser extension. This add-on instructs Google Analytics JavaScript scripts (ga.js, analytics.js, and dc.js) to avoid sending visitation information for Google. In addition, visitors who have installed the disabling browser extension, do not participate in content experiments.

If you want to disable Analytics web activity, visit the Google Analytics opt-out page, and install the add-in for your browser. For more information about installing and uninstalling the add-in, see the help for that browser. The Data Controller reserves the right to make changes in the contents of the Website or this Policy at any time. About the current Policy, the User can continuously find information under the “Data Protection and Privacy Policy” section.

#### *2.1.1 Information on remarketing, conversion and tracking codes*

The following codes are embedded in all main pages and all subpages:

- Google Analytics Code
- Google adwords remarketing code
- Google adwords conversion tracking code
- Facebook remarketing code
- Facebook conversion tracking code

The IP addresses of visitors arriving at our website are recorded by Google and Facebook, and they offer ads on Google display network and Facebook message wall in the next 30 days following the visit.

#### *Legal background and legal basis:*

The background of data processing is based on the act 112th of 2011 (Info act) about the right of informational self-determination and freedom of information as well as the provisions of Act 108 of 2001 about certain aspects of the Electronic Commerce Services, and of the issues related to the information society.

The legal basis for data processing in compliance with point (a) section (1) of § 5 of the Info act is your consent. By using the website, you give your consent to storing of the mentioned codes on your computer and be accessed by the Data Controller. The codes, as a rule, are stored for 30 days, but you can also use the browser program to set and prevent the activities related to the codes. However, we draw your attention to the fact that in the latter case, without using the codes you may not be able to use all of the services of this website.

#### *2.2. Data management related to newsletter sending*

##### *Legal background and legal basis of data processing:*

The background of data processing is based on the Act 112 of 2011 (Info Act) about the right of informational self-determination and freedom of information and the basic conditions of economic advertising and certain limits as per act 48th of 2008 (Grt). The legal basis for data processing in compliance with point (a) section (1) of §. 5. of the Info act and sections (1)-(2) of §. 6. of Grt is your consent.

##### *The purpose of data processing:*

The purpose of data management is to make you informed about the latest and best offers and promotions.

*Scope of the managed data:*

The name and e-mail address are required for data processing.

*Duration of data processing:*

Withdrawal of your consent.

*2.5 Processing of data related to the sending and rendering of personalised advertising*

*Legal background and legal basis of data processing:*

The background of data processing is based on the Act 112 of 2011 (Info Act) about the right of informational self-determination and freedom of information and the basic conditions of economic advertising and certain limits as per act 48th of 2008 (Grt). The legal basis for data processing in compliance with point (a) section (1) of §. 5. of the Info act and sections (1)-(2) of §. 6. of Grt is your consent.

*The purpose of data processing:*

The purpose of data processing is to provide you with personalized offers, best matching your needs and preferences.

*The scope of the managed data:*

In the course of data processing, the Data Controller records - with the help of cookies and codes, the products you have visited earlier.

*Duration of data processing:*

Withdrawal of your consent.

*2.6 Data management associated with contact and request for quotation*

*Legal background and legal basis of data processing.*

The background of data processing is based on the Act 112 of 2011 (Info Act) about the right of informational self-determination and freedom of information (Info Act). The legal basis for data processing in compliance with point (a) section (1) of § 5 of the Info act is your consent.

*The purpose of data processing:*

The purpose of data management is to make you informed about the latest and best offers and promotions.

*The scope of the managed data:*

When contacting, you must enter your name or company name and your e-mail address.

*Duration of data processing:*

The personal data provided during the contact process will be stored until revocation, but you have the option to request their deletion at any time.

## *2.7 The goal of Direct marketing*

### *Legal background and legal basis of data processing:*

The background of data processing is based on the Act 112 of 2011 (Info Act) about the right of informational self-determination and freedom of information (Info Act). The legal basis for data processing in compliance with point (a) section (1) of § 5 of the Info act is your consent.

### *The purpose of data processing:*

#### *The Controller processes personal data solely for the purpose of:*

- a.) fulfilling his obligations and exercising his contractual or statutory rights towards the clients using the services. Ensuring and checking the proper quality of service for the clients and the readers (hereinafter: User and Data Subject). User or Data Subject).
- b) Performing market research and direct marketing (direct marketing) for the stakeholders.
- c.) The data of the stakeholders already registered by the Data Controller in course of later contacts are continuously updated.

### *The scope of the managed data:*

Registration is required to access certain parts of the Mobil port Ltd.'s website.

When registering, the website asks you to provide the following personal information: surname, first name, email address and other internet contact details. The Data Controller shall manage the data given by you: your name, email address, web address and other internet contact details.

### *Duration of data processing:*

The Data Controller manages personal data for 5 years for the purposes of data processing. At the same time with the termination of the purpose of data management the personal data will be deleted or changed at the request of the concerned person.

## *2.8. Further data management*

If the Data Controller wishes to carry out further processing, it shall provide prior information on the essential circumstances of data processing (legal background and legal basis of data processing, the purpose of data processing the scope of processed data, duration of data management).

We inform you that statutory delegated written requests for data by the authorities must be fulfilled by the Data Controller. The Data Controller keeps records on data transfers in compliance with sections (2) - (3) of §. 15. of the Info act (to which authority, what personal data, on what legal basis and when was transmitted by the Controller), whose content shall be made available at the request, unless it is excluded by law.

## *3. About the use of data processors and their activities related to data processing*

### *3.1. Processing for the storage of personal data*

Name and address of the hosting provider:

Balázs Springel, small taxpayer individual entrepreneur, 1112 Budapest, Sasadi str. 108-110. Building C. ground floor 1.

Bálint Lengyel small taxpayer, 3528 Miskolc, Visó str. 18. they perform storing of the personal data on the servers located at the address 1132 Budapest, Victor Hugo str.. 11-15. They are not entitled to know the personal data.

### *3.2. Data processing activities related to marketing purposes*

Abbreviated name of the company MobilPort Ltd.

Name of the company: MobilPort Limited Liability Company

Registered seat of the company 1152 Budapest, Telek str. 7-9.

Company registration No.: 01 09 172437

Tax number: 14991895-2-42

Represented by: Zoltán Havasi

Email: (info@click4skill.com)

Server Provider: AB Plusz Bt. (registered office: 2049 Diósd IV. Béla király str. 48.) registration number: 01-06.

757647

Its privacy policy is available at [click4skill.hu](http://click4skill.hu).

### *4. Data security measures:*

The Data Controller declares that appropriate security measures were taken to ensure protection of the personal data from unauthorized access, alteration, transmission, disclosure, deletion or destruction, accidental destruction or damage, and against becoming inaccessible due to changes in the technique used.

### *5. Your rights in the course of data processing*

*During the period of processing, you are entitled to:*

- the right to get information,
- the right to correct data,
- the right to erase data,
- the right to block data,
- the right to protest.

You may request information from the Controller within the duration of the data management about the treatment of your personal data. The Data Controller shall, within the shortest time from the submission of the request, but no more than within 30 days, inform you in writing and in an understandable form about the managed data, the purpose, the legal basis and the duration of data processing and, where the transmission of data is included who and for what purpose receive or received the data.

Within the period of data management you may request the Controller to correct your personal data. The Data Controller shall meet your request within 15 days at the latest.

You have the opportunity to request the deletion of your personal data, which the Data Controller shall perform not later than 15 within days. The right of deletion does not include the case when the Data Controller is bound by law for further storage, or in the event that in compliance with the section (5) of §.6. of the Info Act the Data Controller is entitled to further process personal data (for example, in respect of invoicing).

You may request the Controller to block the personal data if the permanent deletion of the data would violate the legitimate interests of the concerned person. Personal data blocked in this way can only be managed as long as the purpose which excluded the deletion exists. You may object to the processing of your personal data

- if the processing or transfer of personal data is limited to the fulfilment of the legal obligations referring to the Data Controller, or it is needed for enforcement of the rightful interest of the Data controller, data receiver or third party, except for the case of mandatory data processing and the case included in section (5) of §. 6. of the Info act;

- if the use or transfer of personal data is performed for the purpose of direct marketing, polling or scientific research, without your consent.

The Data Controller shall investigate the protest within the shortest possible time from the submission of the request, but no more than 15 days and make a decision and decide on its grounding and you will be informed about the decision in writing.

#### *6. Contact details and remedies*

E-mail: [info@click4skill.com](mailto:info@click4skill.com)

Letter: 1152 Budapest Telek str. 7-9.

If you have any questions or comments, please contact us:

Phone: +36 (1) 271-1141

Monday — Friday: 09:00 a.m. - 04:00 p.m.

If, in your opinion, the processing did not comply with the legal requirements, you can initiate the procedure of the Data Protection Officer of Mobilport Ltd. In addition, anyone may initiate an investigation at the National Authority for Data Protection and Freedom of Information on the grounds that an infringement has occurred in respect of exercising the rights of processing personal data or there is an imminent risk of the same.

#### *Contact details of the National Data Protection and Freedom of Information Authority:*

National Data Protection and Freedom of Information Authority

Registered address: 1125 Budapest, Szilágy Erzsébet avenue 22 / C.

Postal address: 1530 Budapest, P. O. Box: 5.

Phone: 06-1-391-1400

Telefax: 06-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

*7. Others, Amendment of the Data Processing Information*

The Data Controller reserves the right to modify this data processing information. By using the website after its entry into force following the modification you accept the amended data processing information. The Data Controller shall ensure that, in case of modification, the previous version of the text is also available on the website.

This Data Processing information is governed by the Hungarian law.

Budapest, 31 March 2021

MobilPort Ltd.