

Data Protection Privacy and Data Management Policy

1. Purpose of the Policy

This Privacy Policy outlines the data protection principles and practices of Nanosign Holding Zrt. (Head Office: 1151 Budapest, Harsányi Kálmán Street 83; Company Registration Number: 01-10-142726; Tax Number: 26657042-2-42).

Nanosign Holding Zrt. (referred to as the "Service Provider") processes data from visitors in the course of operating its website, www.nanosign.eu (the "Website"). This Policy ensures that, across all services provided by the Service Provider, individuals—regardless of nationality or residence—are guaranteed respect for their rights and fundamental freedoms, particularly their right to privacy, when their personal data is processed by automated means.

2. The Service Provider as Data Controller

- **Name:** Nanosign Holding Zrt.
- **Address and Mailing Address:** 1151 Budapest, Harsányi Kálmán Street 83
- **Phone Number:** +36 30 0804121
- **Email Address:** gabor.lorinc@nanosign.eu
- **Company Registration Number:** Cg. 01-10-142726
- **Tax Number:** 26657042-2-42

3. Scope of Personal Data Processed

3.1. Cookies

During visits to the Website, the Service Provider may send one or more cookies—small files containing a string of characters—to the visitor's computer to uniquely identify the visitor's browser. These cookies are provided by Google and used through the Google Adwords system. Cookies are only sent when visiting certain sub-pages and store only the fact and time of that visit without collecting additional information.

These cookies serve the following purpose: external service providers, including Google, use these cookies to record whether the Data Subject has previously visited the advertiser's website and, based on that information, display advertisements on other websites belonging to Google's partner network. To opt out of these cookies, users may visit the Network Advertising Initiative's opt-out page. Once opted out, no personalized offers from the Service Provider will be displayed.

Cookies in Use

- **Session Cookies:** Session cookies are automatically deleted after the Data Subject's visit. These cookies ensure that the Website functions more efficiently and securely, enabling essential features and applications to operate correctly.

Persistent Cookies: The Service Provider also uses persistent cookies to enhance the user experience (e.g., by providing optimized navigation). These cookies remain stored in the browser's cookie file for an extended period, which depends on the settings in the Data Subject's internet browser.

Security Cookies

External servers assist with the independent measurement and auditing of the Website's traffic and other web analytics data (Google Analytics). Data controllers can provide detailed information on how these measurement data are managed.

Contact: [Google Analytics](#)

If you prefer Google Analytics not to track your data in the ways and for the purposes described, you may install a browser add-on to block this tracking.

Most browsers include a "Help" function in the menu bar that offers instructions on how to:

- disable cookies,
- accept new cookies,
- set your browser to notify you of new cookies, or
- turn off cookies altogether.

3.2. Data Processing for Other Purposes

Telephone Conversations

The Service Provider operates a customer service line where conversations are not recorded. By initiating the call, the Data Subject voluntarily consents, under the Information Act, that if they contact the Service Provider's customer service for any purpose (complaints, information requests, etc.), the Service Provider may transfer the call to its partners after providing full information as outlined in this document.

In cases where the Service Provider cannot immediately resolve a complaint, or if the Data Subject uses inappropriate language, obscene expressions, or insults the customer service agent or the Service Provider, the Service Provider reserves the right to terminate the call.

4. Legal Basis, Purpose, and Methods of Data Processing

4.1. Legal Basis and Consent

Data processing related to the content on the nanosign.eu website ("Website") is based on the Data Subject's voluntary and informed consent, which explicitly grants permission for the use of any personal data provided during website use. The legal basis for this data processing is the Data Subject's consent under Article 5 (1)(a) of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information ("Infotv.") and Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

Consent is provided by the Data Subject with each instance of data processing by using the Website or by voluntarily providing relevant data.

4.2. Purpose of Processing

The purpose of processing is to facilitate the services offered on the Website. The Service Provider will use the Data Subject's provided data solely for maintaining these services.

Contact with the Data Subject: If the Data Subject has subscribed to a newsletter, their data will also be used for sending the newsletter and for documenting any potential contracts that may be concluded.

4.3 Purpose of Automatically Collected Data

The purpose of automatically collected data is to compile statistics, support the technical development of the IT system, and protect the Data Subject's rights.

4.4 Limitations on Data Use

The Service Provider will not use the personal data for purposes other than those outlined in this Policy. Disclosure of personal data to third parties or public authorities is only permissible with the prior express consent of the Data Subject, unless otherwise required by law.

4.5 Data Accuracy

The Service Provider does not verify the accuracy of personal data provided. The individual providing the data is solely responsible for its correctness. When an email address is provided, the Data Subject assumes responsibility that only they will use the services associated with that email address.

5. Duration of Data Processing

5.1 Data Retention Period

Personal data shall be stored in a form that allows identification of data subjects only for as long as necessary for the purposes of processing. In adherence to the principle of limited retention and mandatory legal requirements, our Company applies the following data deletion standards:

- Messages sent to email addresses listed on the Website, or through the Website's contact menu, will be retained until the Data Subject withdraws their consent.
- Cookies are stored on the Data Subject's computer for the specified duration of each cookie, or until the Data Subject deletes them. Session cookies, however, are only stored until the end of the visitor's session or until the visitor leaves the site.

Data Processing: In handling personal data, the Service Provider employs data processors to maintain and manage the systems used to store and administer data.

5.2 Legal Retention Obligations

The above policies do not affect any legal obligations for data retention (e.g., accounting purposes) or any additional consents provided by the Data Subject during registration or at other points on the Website.

6. Access to Data, Data Transfers, and Data Processing

6.1 Access

Personal data is primarily accessible to the Service Provider and its employees; it will not be disclosed or transferred to third parties.

6.2 Third-Party Processors

The Service Provider may employ data processors (e.g., system operators) for managing IT systems, fulfilling orders, and handling financial settlements.

7. Data Subject's Rights and Remedies

7.1 Right to Access and Modify Data

The Data Subject has the right to request information at any time regarding their personal data processed by the Service Provider. They may also modify this data at any time in accordance with the General Terms and Conditions (GTC).

7.2. Data Access and Record-Keeping

Upon request, the Service Provider will provide the Data Subject with information on the data processed, including data handled by any appointed Data Processor, the source of the data, the purpose, legal basis, and duration of the data processing, and the details of the Data Processor (name, address, activities related to the data processing). This information will also include details of any data breaches (circumstances, effects, and corrective actions), as well as the legal basis and recipient of any data transfers. The Service Provider will provide this information in writing within thirty (30) days of the request.

If the Service Provider has a designated internal Data Protection Officer, they will maintain a record of data breaches to monitor actions taken and inform the Data Subject. This record will include the type of personal data, the scope and number of affected Data Subjects, the date, circumstances, effects, corrective actions, and other information specified by law.

7.3. Contact Information for Exercising Rights

Data Subjects may exercise their rights by contacting the Service Provider at:

- **Postal Address:** Nanosign Holding Zrt., 3527 Miskolc, Besenyői u. 24
- **Email:** gabor.lorinc@nanosign.eu

Data Subjects can address any questions or comments regarding data processing to the contact points listed above.

7.4. Right to Rectification or Erasure

The Data Subject has the right to request rectification or erasure of incorrect data at any time. In other cases, the Service Provider will delete data within three (3) working days of receiving the request; once deleted, the data will not be recoverable. However, deletion does not apply to data processing required by law (e.g., accounting regulations), for which the Service Provider will retain the data as necessary.

7.5. Right to Block Data

Data Subjects may request that their data be blocked. The Service Provider will block personal data either upon request or if, based on available information, deletion could harm the Data Subject's legitimate interests. Data blocked in this way will be processed only as long as the purpose for which deletion was prevented remains applicable.

The Service Provider must notify the Data Subject and all entities to whom the data was previously disclosed about any rectification, blocking, or deletion of data, unless such notification would not affect the Data Subject's legitimate interests.

If the Service Provider denies a request for rectification, blocking, or erasure, it must inform the Data Subject within thirty (30) days, providing the factual and legal reasons for the denial.

Data Subjects may object to the processing of their personal data. The Service Provider will review objections as promptly as possible, within a maximum of fifteen (15) days, and inform the applicant in writing of its decision.

7.6. Legal Remedies

Under the Info.tv. and the Civil Code (Act V of 2013), Data Subjects may:

- Contact the **National Authority for Data Protection and Freedom of Information** (1125 Budapest, Szilágyi Erzsébet fasor 22/c; www.naih.hu)
- Pursue their rights in court.

7.7. Liability for Third-Party Data or Damages

If a Data Subject provides third-party data during registration or causes damage in any way during the use of the Website, the Service Provider is entitled to seek compensation from the Data Subject. The Service Provider will provide full assistance to authorities to identify any offending party.

8. Newsletters and Personalized Newsletters

8.1. Lawful Use of Email Addresses

The Service Provider is committed to the lawful use of managed email addresses, utilizing them only to send informational or advertising emails as specified below.

8.2. Purpose of Email Address Processing

Email addresses are processed primarily for identifying the Data Subject and maintaining communication, with emails sent for these purposes.

8.3. Service Changes and Notifications

In cases of service changes or updates to the GTC, the Service Provider may notify Data Subjects electronically. Such notifications are not used for advertising purposes.

8.4. Newsletter

The Service Provider will only send newsletters containing advertisements or promotional materials to email addresses with the express consent of the Data Subject, in accordance with legal requirements. Newsletters may contain direct marketing elements. Data provided for newsletter subscriptions is processed solely for managing the subscription.

Data Subjects may unsubscribe at any time, free of charge, by clicking the “Unsubscribe” button in the newsletter or by requesting removal via email or post. After unsubscribing, Data Subjects will no longer receive newsletters or promotional offers. Registered users may also unsubscribe through their personal account page.

8.5. Personalized Newsletter

The Service Provider may use personal data to send personalized offers via newsletters. These offers are based on the analysis of the Data Subject’s previous purchases. Unsubscribing from personalized newsletters is handled as outlined in section 8.4. If unsubscribed, the Data Subject will no longer receive personalized newsletters.

9. Additional Provisions

9.1. Activity Data Collection

The Service Provider’s system may collect data on Data Subject activities that cannot be linked to other data provided during registration or from other websites or services.

9.2. Consent for Data Use Beyond Original Purpose

If the Service Provider intends to use data for purposes other than those initially collected, it will inform the Data Subject and obtain prior express consent or provide an option to prohibit such use.

9.3. Data Security

The Service Provider is committed to safeguarding data by implementing technical measures to protect recorded, stored, and processed data from unauthorized access, destruction, or alteration. It also requires any third party handling data to comply with these obligations.

9.4. Amendments

The Service Provider reserves the right to unilaterally amend these Terms and Conditions with prior notice to Data Subjects via the Website. After the amendment, Data Subjects must accept the changes to continue using the Website.

Miskolc, 2024-11-13