#### Informant on Data Processing Privacy Policy

The Privacy Policy below may be applicable to the data controlling and data processing operations of Quantified Company service (hereinafter referred to as **Service** or **Application**), and the <u>quantified.company</u> domain (and its subdomains such as my.quantified.company).

# I. Principles of Data Controlling and Data Processing

1. Quantified Company Ltd. (Service provider) manages recorded personal data with regard to the the present data protection regulations - in particular with Law No 679/2016 known as the General Data Protection Regulation (GDPR), with the international conventions on data protection, with EU legal acts and other applicable legislation, and with this Privacy Policy.

The Quantified Company Ltd. is committed to protecting the personal data of the Data Subjects and therefore adjusts its data management practices to the applicable laws in force while protecting and respecting the private sphere of the Data Subjects.

2. Quantified Company Ltd. only manages the specific personal data of the Data Subject, for the duration and for the purpose specified in this Policy, to which handling the Data Subject has consented or the treatment of which is required or permitted by law.

3. Quantified Company Ltd. takes all the necessary technical and organizational measures and establishes a procedural rule to ensure the security of the personal data provided or made available by the Data Subjects during the entire process of data management.

4. The terms used in this Policy may be interpreted according to the terms defined in the GDPR. The term "Data Subject" covers both the service contact people of the Quantified Company's customers' and all the people involved in the service of Quantified Company by the partners ordering the Service named "Quantified Company" (hereafter referred to as: Partner) themselves (e.g.:employees, mandatees).

5. Quantified Company Ltd. stores the imprint of passwords that are only suitable for password verification, but from which the password itself can not be restored.

# II. Data controlling

# The regulations applicable to the contact persons of Partners ("Users" or "Affected").

These are the administrators of the client who log in to the administrator interface of the system (my.quantified.company/login).

# 1. Details of the data controller

Name: Quantified Company Ltd. Seat: 1028 Budapest, Nedü u. 22/b., Hungary Registration number: 01-09-897936 Mail address: 1028, Budapest, Nedű u. 22/b., Hungary E-mail: Péter Aszalós data@quantified.company

## 2. Data processors

Name Task Information
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Zendesk	Supports ticketing system	https://www.zendesk.com/company/customers-partner s/privacy-policy/
Application and database server	server	Amazon web services, Ireland data center
Google Suite	Collaboration tool	https://policies.google.com/privacy?hl=hu
Google Analytics	web analytics	https://www.google.com/analytics/terms/us.html
Hotjar	web analytics	https://www.hotjar.com/legal/policies/privacy

# 3. Purpose of the data controlling, legal basis and duration

Treated data and data controlling	The purpose of data controlling	The legal basis for data controlling	Period
The contact information of the Partners (name, e-mail address, IP address)	To ensure the rightful use of the Application as an <i>admin</i> (including submitting information and system messages about the Application, sending information on the Application development)	Based on the judgement of the legitimate interest of the Data Controller. A legitimate interest is to keep in touch with the partner, to ensure the availability of the Service during the contract.	During an existing business relationship, during a contact with the ordering partner, or when requesting erasure of the data.
The support of requests of the Quantified Company customer service contact Partners (support tickets)	Providing service, fulfillment of users' requests.	Consent-based data management.	12 months following the completion of the specified task.
Logging (logs): date of visit, IP address, data of the operating system version, browser type and version number, the address of the content received	For statistical and debug purposes and to prevent abuses, in favor of the performance, and the checking of of the Service.	Based on the judgement of the legitimate interest of the Data Controller. Legitimate interest is the technical operation of the Service, debugging, detection of	2 weeks

and the previously visited content.	unauthorized access, statistics training.	
Database dumps -saving of the entire database with all the data contained therein	judgement of the legitimate interest of the Data Controller.	6 months

# 4. Rights regarding data protection, remedies

## a. The rectification, erasure, and the locking of data

1. The Data Subject may at any time modify or request the rectification of his/her data on the place and way specified in this prospectus.

2. The Data Subject may erase his/her personal information or request a to erase or block his/her personal information on the place and way specified in this Policy (e.g.: by user account, email, etc.). In some cases, early erasure of personal data may result the loss of entitlement.

3. The Data Subject may ask an access for his/her personal data processed, including the creation of a copy.

4. The affected Personal Data will also be erased by the Data Controller if its handling is unlawful; if the purpose of data controlling ceased; or the statutory deadline for storage of data expired; or it is ordered by the court or by the National Data Protection and Information Authority; or if the data controlling is incomplete or incorrect - and this status can not be legally remedied - provided that cancellation is not excluded by law.

5. With the termination of the Service, except for the data required to comply with statutory requirements (e.g.: accounting), the Data Manager will erase personal data processed in connection with the specific Service. Renaming, modifying or merging the Service with any other service does not constitute termination of the Service.

6. Instead of erasure, the Data Controller will block Personal Data if the Data Subject requests so, or if, based on the information available, it is assumed that the erasure would violate the legitimate interests of the Data Subject. The personal data blocked will only be managed by the Data Controller as long as the data controlling purpose to exclude the erasure of personal data exists.

## b. Notification of complaint or claim at the Data Controller

1. Complaints or claims may be reported on the following addresse:

Mail address: 1028, Budapest, Nedü u 22 / b., Hungary

E-mail: Péter Aszalós data@quantified.company

2. Regarding the fact that the Data Subject's account is protected by a password and that the password is maintained and kept secret by the Data Subject, the claims submitted by the Data Subject's account are considered by the Data Controller as a claim from the Data Subject.

3. A claim from the e-mail address provided in connection with the Service is considered by the Data Manager as a claim from the Customer. Claims from other e-mail addresses and claims delivered in written form may be issued in case the Data Subject properly identifies his/herself.

4. In case the Data Controller's activity is not based on the consent of the Data Subject, but the data controlling has been abusively initiated by a third party, the Data Subject may request the erasure of his/her personal data or the information disclosed by a Person by virtue of his/her identity and personal relationship.

# c. Remedies

1. The Data Controller provides the possibility of submitting legal remedies if the Affected person properly certifies his identity and his/her relation to the data.

2. Any party may, in case of alleged infringement of the personal data of the person concerned, turn to the competent court, i.e. in the capital city to the Municipal Court of Budapest or initiate an investigation at the National Data Protection and Freedom Authority (Chairman: Dr. Attila Péterfalvi, 1024 Budapest, Szilágyi Erzsébet fasor 22 / C., ugyfelszolgalat@naih.hu, + 36-1-3911400, www.naih.hu ).

# III. Data processing

**Members**: those users who are using the system as team members of our partners but aren't logging in to the system as administrators. Members' data is only processed in the system, the controller of such data remains the company who gave permission to the Service Provider to process data.

While providing the Quantified Company service, Quantified Company Ltd. manages Personal Data of the Partner as a Data Processor, as it is required by the Partner as a Data Controller, in accordance with their current data protection provisions, and in compliance with applicable laws.

Data Subjects may enforce their rights included in GDPR at the Partner, that is, at the Data Controller.

In the case of anonymous questionnaires the Data Processor does not provide any identifiable data or information to the Partner, only if he or she identifies him or herself in a comment within the Service, becomes he/she visible to the Partner.

For statistical purposes, after the expiration of the processing time, some data may be stored in an anonymised and non-personalized way for the purpose of developing and documenting the business of the Data Processor.

People involved in data processing	Purpose of data processing	The legal basis for data processing	Period
The data of the people who were involved in the service by the Partner (typically employees and agents) (including name, e-mail address, group, IP address, optional: Gravatar effigy, in case of disposable member:	The persons belonging to the client's partner are able to express their opinions within the framework of the Service, ensure transparency, filtering multiple registration, to guarantee the exclusive		In the absence of a contrary instruction of the ordering partner, 2 years after the ordered Service has been provided.

random user name, access PIN-code, IP address )	participation of the members of Partner, notification.		
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During the operation of the Service, Quantified Company Ltd. performs the following technical actions with the data:

Logging (logs): date of visit, IP address, operating system version, browser type and version number, content of content received and previously visited content.	For statistical and debug purposes and preventing abuses, the fulfillment and checking the performance of the Service.	Based on the judgement of the legitimate interest of the Data Controller. Legitimate interest is the technical operation of the service, debugging, detection of unauthorized access, statistics training.	6 months
Database dumps -saving of the entire database with all the data contained therein	For statistical and debug purposes and preventing abuses, the fulfillment and checking the performance of the Service.	Based on the judgement of the legitimate interest of the Data Controller. Legitimate interest is the technical operation of the service, debugging, detection of unauthorized access, statistics training.	6 months

Please note, that the Automattic Inc. the service provider of Gravatar, a self-supporting service providing profile images, which is used in the system is independent data controller of personal data (effigy) and transmits these personal data (effigy) to Quantified Company Ltd. based on the agreement of the data subject. Privacy Policy of Automattic Inc.: <u>https://automattic.com/privacy/</u>

## IV. Cookies

You can find a detailed description of cookies here: <u>https://en.wikipedia.org/wiki/HTTP\_cookie</u>. Cookies used to provide Quantified Company service:

Namo of the cookie	Function	Durati on	Stored data, information
PLAY_SESS ION	authentica tion		the session ID, email address stored in the browser

Google attendance measurem ent	26 months	<u>cy/</u> available on useful information Google Inc. and personalize	Inc.'s w.google.hu/intl/hu/pe the website. You can about Google Inc.'s how to disable c your .google.com/anonyme	n find more s activity on cookies and ads:
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## **Version History**

- Original: Budapest, 9th July, 2018
  Edited: Budapest, 25th February, 2019
- Edited: Budapest, 2nd October, 2019: hotjar added as web analytics tool
- Edited: Budapest, 5nd October, 2023: company name changed (CaféOpen Ltd. to Quantified Company Ltd) 1