

## GENERAL DATA MANAGEMENT INFORMATION OF THE A.C.S. HOLDING LLC. ON ITS DATA MANAGEMENT THROUGH THE WEBSITE

Pursuant to the transparency principle of the Regulation (EU) Article 12 of 2016 /679 of the European Parliament and of the Council (General Data Processing Regulation, hereinafter referred to as GDPR) A.C.S Holding Ltd., publishes the below information **to the natural persons concerned**. The purpose of this document is to clearly indicate and inform in details the natural persons concerned (hereinafter referred to as „**Data subject**”) on any actions taken during management of their data.

### 1. Data management of personal data

Pursuant to the present data management policy the data controller is the **A.C.S. Limited Liability Company** (head office: 4030 Debrecen, street Diószegi 0584/55. parcel number, company registration number: 09-09-008643; hereinafter referred to as „**A.C.S.**”, „**Data controller**” or „**we**”), that is liable for ensuring the proper data management in accordance with the applicable legislation.

Upon visiting our website you acknowledge that your personal data is managed by A.C.S. in accordance with the below provisions.

### 2. Purpose and legal base of data management

The Data subjects can give information and data about themselves in the below way on the Website (detailed data can be found under Point 11):

- Information provided to Data controller concerning the usage of Website, that is, during the usage and visit of the Website (see also Point 2.1).

#### 2.1. Data management in terms of the usage of the Website

Data management process	Managed data	Duration of data management	Purpose of data management	Legal base of data management
Data collected during the usage of the Website	Technical data such as IP address of the Data subject, date and time of visit, type of browser, addresses of websites visited previously that are automatically stored by the system at the time of entrance or exit.	5 years from storage	Development of the Website and services. This data is inappropriate to the identification of the Data subject.	Voluntary contribution of the Data subject.
Contact via e-mail	Name, email address, other communication of the contact person.	5 years from receipt of the mail.	Contact, keeping in touch from the website directly.	Voluntary contribution of the Data subject.

## 2.1.1. Cookie management

In order to provide customized service a small amount of data, so-called cookies, are set on the computer of the Data subject by A.C.S. that are read back by another visit. If a previously saved cookie is sent back by the browser, the provider of cookie management has the possibility to combine the actual visit of the user with his/her previous visit, but only with the consideration of own content.

The most common type of cookies is the secure cookies that 'are used for sessions and protected by passwords'.

Session cookies are deleted after the visit of the Data subject. These cookies facilitate the effective and secure operation of Websites; therefore, they are indispensable to the appropriate operation of certain functions and applications of the Website.

Persistent cookies are also used by A.C.S. for the enhancement of user experience (for instance, optimized navigation). These cookies are stored for a longer time in the cookie files of browsers. The duration is dependent on the setting of the browser of the Data subject.

Managed data: IP address, date and time of visit.

Data subjects: All Data subjects visiting the website.

Purpose of data management: Differentiation of Data subjects, identification of actual sessions of users, storage of data provided during sessions, prevention of data loss.

Duration of data management: The duration of data management by session cookies is until the end of the website visit whereas in other cases it can be 30 days at most.

## 2.1.2. Deletion of cookies

Data subject possesses the right to delete the cookies from his/her own computer or block the application of cookies in his/her browser. Usually cookie management can be set in the Tools/Settings menu of the browser under the Data protection/History/Individual settings menu with the name of cookie or tracking.

Websites may include information coming from a third party or advertising agencies that are not in relation to the Data controller. It can occur that cookies or web beacons are set on the computer of the Data subject by third persons, or data is collected with the application of similar technologies in order to send direct advertising about their own services to the Data subject. In such cases the data protection rules defined by the third party shall prevail; thus, by such data management the Data controller has no liability. Websites may contain links to external servers (managed by other data controllers or processors) and through these links these sites may set their own cookies or other files on the computer or collect data or ask for personal data. For these no liability shall be imposed on the Data controller. There is no data collection or management and data of the Data subject is not used or identified. Advertisements of A.C.S. may appear on websites of external service providers (like Google). These external service providers store data with the help of cookies in order to have advertisements popping up for the Data subject who has formerly visited the website of the Data controller; thus, remarketing tactic is applied by them.

## 2.1.3. Cookies set by Google Analytics

Google Analytics is the web analytics service offered by Google Inc. ('Google'). Google Analytics analyzes the user interactions on your Website with the help of cookies stored on the computer of the Data subject. The legal base of the web analytical data management is the voluntary consent of the user of the Website. Analytical cookies is the anonymised and aggregated amount of data based on which the identification of the computer is difficult, but not excludable. The analytical information collected by the Google Analytics cookies is transferred and stored on the Google servers. This information is then processed by Google based on the assignment of A.C.S. in order to map the website browsing habits of users, make reports on the frequency of website usage and provide further services relating to the usage towards A.C.S.. In the framework of the Google Analytics application the IP address forwarded through the browser is not linked with other data by Google. The Google Analytics uses cookies with analytical purposes. Further information on cookies used by Google Analytics can be found on the below link:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#analyticsjs>

## 2.1.4. Google Adwords

The remarketing codes of Google Adwords are used by the Website. The reason is that remarketing advertisements are sent to Website's visitors on webpages belonging to the network of Google Display. The remarketing code uses cookies to tag visitors. The Website users can block these cookies if the advertisement settings of Google are modified by following the instructions there. Thereafter, no personalized offers are sent to them by the service provider. Further information on cookies used by Google can be found on the below link:

<https://policies.google.com/technologies/ads?hl=hu>

The data protection declaration of Google can be found here

<https://policies.google.com/privacy?hl=hu>

## 2.1.5. Hotjar

The Website periodically uses the web analytics of Hotjar for analysing the behavior of users. Hotjar analyzes the user interactions on your Website with the help of cookies stored on the computer of the Data subject. The legal base of the web analytical data management is the voluntary consent of the user of the Website. Analytical cookies is the anonymised and aggregated amount of data based on which the identification of the computer is difficult, but not excludable. Analytical cookies are used by Hotjar. Further information on cookies used by Hotjar can be found on the below link:

<https://www.hotjar.com/legal/policies/cookie-information>

## 2.2. Other information

The personal data provided is not used and is not to be used for other purposes than defined above by the Data controller. Unless otherwise required by the law, Personal data shall be handed over to a third party or authorities only with the prior explicit consent of the Data subject. In any other case when the data provided is to be used for another purpose than the original one by the Data controller, the Data subject shall be informed and his/her prior explicit consent is necessary; moreover, he/she shall have the opportunity to decide on blocking the usage. Data controller shall manage the personal data until the purpose of data management is fulfilled; therefore, primarily during the legal relationship with the Data subject (after this period all data related to the Data subject or given by him/her shall be deleted) or until the request on deletion by the Data subject or the withdrawal of his/her consent.

Data management is carried out automatically in an electronic way: data is stored and managed by an IT system. No profiling or such process happens with the automatized data management whose result would be the evaluation of the personal features of the Data subjects; it solely serves the platform management of appointments.

## 3. Data processors

Data processor	Head office	Company registration number	Activity
Tárhely.eu Kft	241/Floor X. 4 Ormánság u., Budapest 1144	01 09 909968	hosting provider
Project Partner Team Kft.	14 Szent Benedek utca, Fót 2151	13 09 147885	IT services, admin tasks

## 4. Transfer of data

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In the absence of a dedicated regulation, the Data controller is to hand over the data of the Data subject for identification with the explicit consent of Data subject.

## 5. Rights of the Data subject

### 5.1. Notification and access to personal data

The Data subject has the right to be aware of his/her personal data stored by A.C.S. and all process-related information; furthermore, to request and check what data is stored about him/her by A.C.S., also he/she is entitled to get access to his/her personal data. The access claim of the Data subject shall be sent in written form to A.C.S. who shall provide the data requested in written (electronically or by post), no verbal communication is provided related thereof. In case the exercise of right to access the below data is shared:

- scope of managed data;
- purpose, duration, legal base of data management considering the scope of managed data;
- transfer of data: to whom data is sent or is to be sent in the future;
- source of data.

The Data controller provides the first paper or electronic copy of personal data to the Data subject free of charge. For further copies requested by the Data subject extra administration cost is to be charged of a reasonable rate. Provided an electronic copy is requested by the Data subject, the information is sent to Data subject in e-mail, in a commonly used electronic form, by the Data controller. After receiving the information Data subject may request the rectification, amendment, deletion, constraint of management of his/her personal data, or even object to the management of his/her personal data, or initiate proceedings according to Point 5.4 if he/she disagrees with the data management and accuracy of his/her personal data pursuant to Point 5.2.

### 5.2. Right to rectification, complement of the managed personal data

At the request of the Data subject, A.C.S. shall rectify the inaccurate personal data of Data subject indicated in a written form with undue delay and amend the incomplete information with the content indicated by the Data subject. The Data controller shall inform all recipients on the rectification and completion with whom personal data has been shared except if it proves impossible or it would mean a disproportionately large effort. The Data subject may be informed about the data of recipients if it is requested by him/her in written.

### 5.3. Right to limitation of data management

After request Data subject is entitled to have his/her data limited by the Data controller if

- the Data subject disputes the accuracy of the personal data. In this case the limitation refers to the period during which the accuracy of the personal data is checked by the Data controller;
- data management is unlawful, the Data subject opposes to the deletion of data and request limitation of use;
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### 5.4. Right to be forgotten or to erasure

After the request of the Data subject, the Data controller erases the personal data of the Data subject without undue delay if any of the below reasons persist:

- personal data is no longer required for the purpose it has been collected and managed by the Data controller;
- the Data subject withdraws his/her consent as base of data management and there is no other legal base for data management;

- Data subject objects to data management from personal reasons and there is no legitimate reason for data management;
- Data subject objects to data management of personal data for the purposes of obtaining business, including profiling, provided it is connected to direct marketing;
- personal data is managed by Data controller unlawfully;
- collection of personal data is linked with services of information society offered for children.

The Data subject may exercise his/her right to be forgotten or to erasure if the data management is necessary

- for the exercise of right to the freedom of expression and information;
- for public interest concerning the area of public health care;
- for the purpose of public archiving, scientific, history or statistical research if the exercise of right to be forgotten made or seriously endangered the data management; or
- for the submission, enforcement or protection of legal claims.
- management of personal data is not necessary by Data controller any more; however, the Data subject requests it for submission, enforcement or protection of legal claims;
- the Data subject objects to the data management in which case the limitation refers to the period during which it is concluded whether the legitimate grounds of the controller override those of the Data subject.

The Data controller informs the Data subject in advance about the limitation of the data management and the removal of restriction of data management.

## 5.5. Right to data portability

With the right to data portability the Data subject can get and use his/her 'own' data given in the system of the Data controller for his/her own purposes and via different service providers. In every case the access shall be limited to the data provided by the Data subject, there is no possibility for other data portability; (by for example statistics, transactional data etc.) by subscription personal data is forwarded in a well-arranged, commonly used, typed form; he/she is entitled to send it to another data controller or request the direct forwarding to the other data controller if it is technically feasible in the system of the Data controller. The Data controller shall arrange the claim on right to portability exclusively in e-mail or by post based on the request. In order to execute the request the Data controller shall check whether the Data subject entitled aims to exercise this right. Therefore, the Data subject shall provide all data that enables the effective identification. The necessary data at least: name, e-mail address, name on the invoice, address, phone number (depending on the service used). In the framework of this right the Data subject may request the portability of his/her data that has been directly given by him/her during the services defined in Point 2. The exercise of right does not automatically come together with the erasure from the Data controller's systems; as a result, the Data subject may use the services of the Data controller after the exercise of this right. The data is erased only if the Data subject exclusively requests it.

## 5.6. Objection to the management of personal data

The Data subject may object to the management of his/her personal data including profiling as well from personal reasons; besides, the Data subject is entitled to the objection of personal data management for direct marketing including profiling. Provided the Data subject is against the personal data management for direct marketing, the Data controller shall not manage the personal data further on. The Data subject may object in writing (e-mail or by post) or by clicking on the unsubscribe link in the mail having sent to him/her.

## 5.7. Deadline of claims

The Data controller informs the Data subject without undue delay about the measures taken in a month from the receipt of any claims as per Point 5.1-5.6. If necessary, this deadline may be extended with two other months

considering the complexity and number of claims; nevertheless, the Data controller shall notify the Data subject in a month from the receipt of the claim by explaining the reasons of delay. Provided the Data subject submits the claim electronically, the notification shall also be sent electronically if the Data subject does not request it otherwise.

## 6. Opportunities for law enforcement

The Data subject shall exercise his/her rights with a claim sent as an e-mail or by post. There is no opportunity for law enforcement by phone. The Data subject shall exercise his/her rights by

Name: A.C.S. Holding LLC.

Date Protection Officer: Ildikó Marczy

Postal address: 3rd floor, 3 Lechner Ödön fasor, Budapest 1095

Email address: imarczy@vascular.hu

The Data subject shall not enforce his/her rights if the data controller proves that the Data subject is not identifiable in this situation. Provided the claim of the Data subject is manifestly unfounded or exaggerated (especially by repeated cases), a reasonable fee for the processing of the claim may be charged by the Data controller, or he/she may refuse to take any measures. The Data controller shall cover the process fee needed to prove his/her right. Provided the Data controller has a doubt on the identity of the natural person submitting the claim, other necessary information may be requested for the confirmation of the claimant's identity. If the Data subject disagrees with the Data controller's decision pursuant to the Privacy Act, the Provision and the Civil Code ( Act 5 of 2013), he/she may turn to the National Authority for Data Protection and Freedom of Information (22/c. Szilágyi Erzsébet fasor, Budapest 1125; [www.naih.hu](http://www.naih.hu)) or to the court for law enforcement.

## 7. Management of personal data breach

This is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or disclosure of personal data transmitted, stored or otherwise processed results in unauthorized access.

The Data Controller shall supervise the actions taken concerning the data breach, notify the competent authority, and make a register for the notification of the Data subject; the register includes the personal data concerning the breach, the persons and their number, date, circumstances and effects of the breach, and the measures taken for prevention. If the Data controller considers the breach having a high risk on the rights and freedom of the Data subjects, he/she shall inform the Data subject and the competent authority about the data breach with undue delay, within 72 hours at most.

## 8. Links

The A.C.S. Holding Kft is not liable for the content, data and information protection practice of external sites accessible as jump points from the Website. If the A.C.S. Holding Kft. becomes aware of an infringement caused by the linked page or linking on the rights of a third party or the regulations in force, the link shall be immediately removed from the Website.

## 9. Data security

The Data controller shall undertake to ensure data security; furthermore, take technical and organizational measures and make process regulations by which the saved, stored and managed data stays in safe, also prevent its erasure, unlawful use and unlawful amendment. He/she also undertakes to call the third party to whom the data is forwarded or handed over based on the consent of the Data subject in order to meet the data security requirements. The Data controller ensures that no unauthorized person could access, publish, forward, amend or erase the managed data. The managed data is solely available for the Data controller, his/her subordinates

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and data processor(s) appointed by him/her; this data shall not be handed over by the Data controller to third persons without authorization. The Data controller does his/her best to prevent the data from damage or erasure. The above requirement is valid for the employees of the Data controller participating in the data management activity. The Data subject acknowledges and accepts that no entire protection can be guaranteed for the data on the Internet if personal data is provided by him/her on the Website despite A.C.S. Holding LLC. possesses state-of-the-art devices that prevent unlawful access and detection of data.

In case unlawful access or data detection arise in spite of all our efforts, A.C.S. Holding LLC. is not liable for the unlawful access or data detection or any damage caused by this to the Data subject. In addition, the Data subject may give his/her personal data to third persons who may use it for unlawful purposes or in an unlawful way. The Data subject shall not collect data under any circumstances that refers to races, national or ethnic minority roots, political opinions or affiliation, religion or other ideology, membership at a representative body, state of health, addictions, sexual life and criminal record.

It is important by data security to log out from the website if the Internet is used in public places. However, if you visit our website from your own computer then depending on the application you can stay signed in for a certain time. Be aware in this case as well not to let anybody access your computer to carry out transactions in your name (subscriptions, registrations etc.).

## 10. Other provisions

The Data controller preserves the right to unilaterally amend the present Data Management Information besides informing the Data subject via the Website of [www.vascular-capital.weboldal-cegeknek.hu](http://www.vascular-capital.weboldal-cegeknek.hu) in advance. After the amendments have come into force the Data subject - except the case of objection - accepts the amended content of the Data Management Information by the implication of using the Website and the services further.

## 11. Domain addresses operated by the admin (website):

- [vascular-capital.weboldal-cegeknek.hu](http://vascular-capital.weboldal-cegeknek.hu)