



CLEARVIS.IO – PRIVACY POLICY

1 INTRODUCTION

- 1.1 This Privacy Policy (hereinafter referred to as the "Policy") forms part of the Clearvis.io's Agreement for the use of the Services and, unless otherwise stated in this Policy, capitalized terms shall have the meaning given in the Terms of Service.
- 1.2 When using our Services, as well as when contacting us for other purposes, we may obtain information that constitutes personal data. We, as the data controller, hereby provide information on the processing of such personal data and on the processing of personal data provided by the Customer during the conclusion, maintenance and performance of their Agreement. Personal Data means any information relating to an identified or identifiable natural person ("Data Subject"). Such data are processed when the Subscriber enters into an Agreement, e.g. as a sole trader. In addition, in the course of concluding and performing the Agreement, Clearvis.io will come into contact with natural persons acting on behalf of the Subscriber and with the personal data of these persons. These personal data are provided to Clearvis.io either by the Subscriber or by the persons concerned.
- 1.3 We will process your Personal Data only for the purposes described in this Policy, in the manner and for the period necessary for those purposes, in accordance with the law. We ensure the necessary high standards of data security, technical and organisational measures to ensure the security of the data.
- 1.4 By using our Services, you agree to all the terms and conditions set out in this Policy, so please read carefully before using them.

2 DATA CONTROLLER

- 2.1 The details of the controller of Personal Data:
- (a) Name: ClearVis PMS Ltd.
 - (b) Registered address: H-2112 Veresegyház, Etűd utca 10.
 - (c) Company registration number: 13-09-156523
 - (d) Court of registration: Budapest District General Court
 - (e) Tax number: 23929348-2-13
 - (f) Postal address: 2112 Veresegyház, Etűd utca 10.
 - (g) E-mail address: support@clearvis.io
 - (h) Telephone number: +36 1 4900 400
- 2.2 The current policy in force can be downloaded from <https://clearvis.io>
- 2.3 Contact details of Data Protection Officer:
- (a) Name: Szilard Novaki
 - (b) Mail address: H-2112 Veresegyház, Etűd utca 10.
 - (c) E-mail address: dpo@clearvis.io
 - (d) Phone number: +36 1 4900 400



3 DATA PROCESSING ACTIVITY

3.1 For conclusion and performance of Agreement, we process data as:

(a) Scope: the information provided during conclusion of Agreement, which is:

- Company name
- Company address
- Tax number
- Contact name
- Contact business phone number
- Contact business email address
- Store name
- Store address

(b) Purpose: conclusion of Agreement; registration of given contact as first User Account of Subscription; performance of contract (including notifications of changes of Terms of Services); invoicing

(c) Legal basis: The legal basis for the processing of these data is GDPR Article 6(1)(b) to ensure the performance of the contract and the settlement of any disputes which may arise. For personal data entered during conclusion of Agreement, Clearvis.io shall use data in accordance with the GDPR Article 6(1)(f) on the basis of a legitimate interest in the performance of the contract.

(d) Duration: During the term of the Agreement and for 5 years after the termination of the Agreement, Clearvis.io shall process the necessary data in order to enforce the claims and rights arising therefrom pursuant to Section 6:22 of Act V of 2013 on the Civil Code. Invoices are kept by Clearvis.io for 8 years according to the law.

3.2 During providing customer service for Subscribers, we process data as:

(a) Scope: When the Customer reports an error, complaint or notifies customer service otherwise:

- Company name
- Store name
- Subject, date and time of the error, complaint or notification
- The name, contact details (e-mail address) of the natural person acting on behalf of the Subscriber, as well as any communication with him/her and any personal data provided in the course of such communication.
- In the event of a fault report, the Subscriber data on the Subscriber's activities recorded in the system log file during the use of the services, if necessary for analyzing the fault
- When customer service is notified on phone: the audio recording of the call, the date and time of the call.

(b) Purpose: The purpose of the data processing is responding to requests and complaints, correcting errors related to Subscription. Also, the purpose of data processing is to help resolve any disputes or subsequent questions related to an issue



reported earlier.

(c) Legal basis: performance of contract including any warranty claims

(d) Duration: Clearvis.io shall keep the processed data for 5 years after the conclusion of the issue, in accordance with the provisions of §6:22 of Act V of 2013 on the Civil Code.

3.3 For the reasons of product development, we process data as:

(a) Scope: log of Subscriber's and Authorized Users' activities recorded in the system log file during the use of the Subscription.

(b) Purpose: to improve the user experience, to improve and develop Clearvis.io.

(c) Legal basis: legitimate economic interest of Clearvis.io in the continuous improvement of its services.

(d) Duration: as long as required to reach purpose, with a maximum duration of 2 years.

4 PERSONAL DATA ACCESS

4.1 Personal Data provided by Customer shall be treated confidentially and shall be only disclosed or transmitted to third parties as set out in Terms of Service.

4.2 Personal data may be disclosed to the following Clearvis.io employees during data processing described in clause 2:

(a) On conclusion, renewal, upgrade of Agreement and payments: Sales, Customer Service

(b) On support requests: Customer Service, Software Engineering Team, Infrastructure Engineering Team

(c) On inquiries, contact forms: Sales, Customer Service

4.3 In the event that Clearvis.io asserts a legal claim against the Customer, the personal data provided may also be disclosed to the extent necessary for the assertion of the claim by Clearvis.io's legal cooperation partners and claims management partners.

5 DATA PROCESSORS

5.1 Clearvis.io uses the following data processors to perform technical tasks related to data processing:

(a) Octonull Ltd. (head office: H-1085 Budapest, József körút 74., I./6.): Clearvis.io uses the online invoicing software operated by Octonull Ltd. Invoices may contain Personal Data (in case of entrepreneurs).

(b) ATW Internet Ltd. (head office: H-1138 Budapest, Esztergomi út 66. fszt. 1.): Clearvis.io's servers are hosted at ATW Internet Ltd. The server rooms are located in Hungary.

6 DATA SECURITY

6.1 Clearvis.io undertakes to take the necessary data security measures. In this context, Clearvis.io shall adopt and develop, regularly review all technical and organisational measures and procedural rules that ensure the security of the personal data processed by Clearvis.io, and shall do its utmost to prevent the destruction, unauthorised use or alteration of the data, and shall ensure that the personal data processed cannot be accessed, disclosed, transmitted, modified or deleted by unauthorised persons.



Clearvis.io shall draw the attention of all those to whom it transmits personal data to comply with the requirements of data security and shall require its employees involved in data processing activities to do the same.

- 6.2 In the context of the above, Clearvis.io shall design and select the information technology solutions in such a way as to ensure that those who have access to the data have exclusive access to the data and that the data retain their authenticity and integrity. This includes, but is not limited to, the encryption of personal data, password protected access systems, activity logging, regular back-ups and so on.
- 6.3 Clearvis.io shall at all times monitor the development of technology, the available technical, technological and organisational solutions and shall apply solutions that meet the level of protection justified by its data processing.
- 6.4 However, Clearvis.io informs the data subjects that if they provide their personal data on the website, despite the fact that Clearvis.io has state-of-the-art security measures in place to prevent unauthorised access to the data, the data cannot be fully protected on the Internet. In the event of unauthorised access despite the use of modern data security systems and methods, Clearvis.io excludes its liability.

7 PROCEDURE FOR DATA BREACH

- 7.1 A data protection incident is any event that results in the unlawful processing or treatment of personal data processed, transmitted, stored or handled by Clearvis.io, in particular unauthorised or accidental access, alteration, disclosure, deletion, loss or destruction, accidental destruction or accidental damage to personal data.
- 7.2 Clearvis.io shall notify the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH) of the data protection incident without undue delay, but no later than 72 hours after becoming aware of the data protection incident, unless it can prove that the data protection incident is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification cannot be made within 72 hours, it shall state the reason for the delay. The notification to the NAIH shall include at least the following information:
- (a) the nature of the personal data breach, the number and category of data subjects and personal data;
 - (b) the name and contact details of the Data Protection Officer;
 - (c) the likely consequences of the data breach;
 - (d) the measures taken or planned to manage, prevent or remedy the personal data breach.
- 7.3 In addition, if the data breach is likely to result in a high risk to the rights and freedoms of natural persons, Clearvis.io shall inform the data subject of the occurrence of the data breach without undue delay, unless the adverse effects and risks of the data breach have been successfully prevented. The information will also be published on the website. The information shall contain at least the information specified in this point.
- 7.4 Clearvis.io keeps records of data breaches for the purpose of monitoring the measures taken in relation to the data breach and informing the data subjects. The register shall contain the following data:
- (a) the facts about the data breach: the nature of the data breach, the scope (categories) and number of personal data concerned, the scope (categories) and number of persons



concerned, the date of the data breach;

(b) the circumstances and effects of the data breach;

(c) the measures taken to respond to the data breach.

7.5 Clearvis.io will keep the data in the register for 5 years from the date of the data breach.

8 RIGHTS OF DATA SUBJECT

8.1 The data subject has the right to withdraw data processing consent at any time without giving reasons. Clearvis.io shall no longer process the personal data of the data subject following the withdrawal of consent. Withdrawal of consent shall not affect the lawfulness of the prior processing.

8.2 By contacting the Data Protection Office, the data subject may at any time request information on whether Clearvis.io is processing his/her personal data or request information on: the purposes of the processing, the legal basis for the processing, the personal data of the data subject processed by Clearvis.io, the categories of personal data processed, the recipients or categories of recipients (including data processors used by Clearvis.io) to whom or which the personal data have been or will be disclosed (in case of data transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the transfer, the duration of the storage of the data, the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data, the right to lodge a complaint with the NAIH, the source of the data, the circumstances of the possible data breach, its effects and the measures taken to remedy it. Clearvis.io shall provide the data subject with a copy of the personal data processed by Clearvis.io. The first copy shall be free of charge, but Clearvis.io is entitled to charge a reasonable fee for each additional copy.

8.3 If the data subject becomes aware that any of his or her personal data is inaccurate, incorrect, erroneous or incomplete, Clearvis.io shall correct or supplement the data upon his or her request (indicating the correct or supplementary data).

8.4 The data subject has the right to request the erasure of his or her personal data. The data subject has the right to request the erasure of his or her personal data. Please note that Clearvis.io may refuse to erase the data, in particular if it needs or may need the data in order to comply with a legal obligation or to enforce a claim. Cancellation is also possible if:

(a) the personal data are no longer necessary for the purposes for which they were processed by Clearvis.io;

(b) the data subject has objected to the processing and there are no overriding legitimate grounds for the processing;

(c) the data subject has objected to the processing for direct marketing purposes;

(d) the processing of the data is unlawful;

(e) the deletion is required by European Union or national law.

8.5 In the course of the processing, the data subject may request the restriction of processing if (i) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow Clearvis.io to verify the accuracy of the personal data; (ii) the processing is unlawful and the data subject



opposes the erasure of the data and requests instead the restriction of their use; (iii) Clearvis.io no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; (iv) the data subject has objected to the processing based on the legitimate interests of Clearvis.io; in this case, the restriction shall apply for a period of time until it is established whether the legitimate grounds of Clearvis.io prevail over the legitimate grounds of the data subject. In the case of restriction, Clearvis.io shall only store the data and shall not perform any other operations on the data, unless the data subject consents to further operations or such operations are necessary for the protection of his or her rights or the rights of third parties or in the public interest. In the event of a restriction of data processing, Clearvis.io shall inform the data subject in advance of its lifting.

- 8.6 The data subject may request that the personal data provided by him or her to Clearvis.io and processed electronically by Clearvis.io be provided to him or her or to another person designated by him or her in a commonly known and easily usable electronic format.
- 8.7 The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data based on the legitimate interests of Clearvis.io. In such a case, Clearvis.io may no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where the processing of personal data relating to the data subject is carried out for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data relating to him or her for such purposes. If the data subject objects to the processing of his/her data for direct marketing purposes, Clearvis.io shall no longer process his/her personal data for such purposes.
- 8.8 The data subject may exercise the rights set out above by sending a request by electronic means to the following e-mail address: dpo@clearvis.io. If Clearvis.io has doubts about the identity of the data subject or if the data provided are insufficient for identification, Clearvis.io is entitled to request additional identification data from the data subject.
- 8.9 Without undue delay, and in any event within 1 month of receipt of the request, Clearvis.io shall inform the data subject of the action taken in response to the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further 2 months. Clearvis.io shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within 1 month of receipt of the request.
- 8.10 Clearvis.io will fulfill reasonable requests free of charge. However, if the request is manifestly unfounded or excessive, in particular in view of its repetitive nature, Clearvis.io shall be entitled to charge a reasonable fee or even refuse to act on the request.
- 8.11 Clearvis.io shall inform all those with whom it has communicated the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At the request of the data subject, Clearvis.io shall inform the data subject of the identity of the recipients to whom it has communicated the data in accordance with the foregoing.

9 COMPENSATION



- 9.1 If Clearvis.io causes damage to the data subject or to another person by unlawful or unsecure processing of the data subject's personal data, the data subject or the person who has suffered damage shall be entitled to claim such damage from Clearvis.io.
- 9.2 If Clearvis.io infringes the personal rights of the data subject in this context, the data subject is entitled to claim damages.
- 9.3 Clearvis.io is not liable to pay compensation or damages if the damage can be proven to have been caused by an unavoidable external cause outside the scope of data management, or if the damage was caused by the intentional or grossly negligent conduct of the data subject.

10 HOW TO MAKE A CLAIM

- 10.1 If you consider that we are not acting lawfully in processing your personal data, please first communicate your comments or requests to us as the data controller using one of the contact details indicated in Clause 2.3 in order to enable us to process and handle your comments as quickly and efficiently as possible.
- 10.2 In the event of unlawful data processing, the data subject is also entitled to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings. Contact details of the NAIH office can be found at <https://www.naih.hu/>.
- 10.3 The data subject also has the right to pursue his or her claim in court. The courts have jurisdiction to hear the case. The person concerned may bring the action before the courts for the place where Clearvis.io is established or where the person concerned resides or is domiciled.