

# PRIVACY POLICY

## GENERAL INFORMATION ON HOW WE PROCESS YOUR DATA

**MP Solutions Kft.** (“the **Company**”, “**we**”) organizes hackathon online and offline events and competitions as well as technology conferences, workshops and other possible meetups (the “**Event**”) and provides the [theluckywheel.techatjasmin.com](http://theluckywheel.techatjasmin.com) websites (the “**Website**”) relating to such Events. For these purposes the Company may collect and process personal data of the users of the Website and the participants, applicants and other visitors of the Events.

The purpose of this Privacy Policy is to clarify and inform the applicants, participants, and other visitors of the Events and the users of the Website (all the individuals mentioned above referred to as “**Users**”) on how their personal data is processed and stored.

The purpose of this Policy is also to ensure – by following the following rules in respect of the processing of personal data – the protection of the personal data of the data subjects, the respecting of the privacy of the data subjects and of their freedom of personal data self-determination, in order to safeguard the data from accidental or purposeful harm, disclosure or access to unauthorized persons.

In this Privacy Policy, the Website and the services offered on the Website are collectively referred to as the “**Services**”.

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on the Website.

The legal background of this Privacy Policy is mainly:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- Act CXII. of 2011 on the right to information self-determination and information freedom (Infotv.)
- Act CVIII. of 2001 on certain issues of electronic commerce activities and information society services

Please note that this Privacy Policy only covers data processing carried out by the Company as data controller.

## 1. WHO ARE WE?

**The data controller is**

**Name:** MP Solutions Kft.

**Business ID:** A limited liability company incorporated in Hungary under Nr. 01-09-914023

**Correspondence address:** 1088 Budapest, Bródy Sándor utca 2. 2. em. 8B.

**Represented by:** Pelle David

**E-mail:** [info@mps.hu](mailto:info@mps.hu)

## 2. THESE WILL HELP YOU UNDERSTAND MORE:

Below you can find the definitions of the most important legal terms used in this Privacy Policy:

- **data subject:** an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly;
- **personal data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **genetic data:** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- **biometric data:** means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- **data concerning health:** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- **consent of the data subject:** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **objection:** a statement of the data subject, in which he or she objects to the processing of his or her personal data, and requests the termination of processing and/or the deletion of personal data;
- **controller:** the natural or legal person who determines the purposes and means of the processing of personal data;
- **data processing:** any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

### **3. PERSONAL DATA PROCESSED**

#### Purposes of data processing

In general, there are three purposes for the processing of personal data by the Company:

#### **1. To provide and develop the Services and to organize and develop the Events**

We process personal data in the first place to be able to offer the Services to the Users, to organize the Events as well as for User verification. We process personal data for the evaluation and selection of potential applicants and team members for the Events.

We also process the personal data provided by the Users in order to develop the quality of our Services and Events, for instance by analyzing the employment histories of the Users and the programs the Users have applied to.

#### **2. For customer communication and marketing**

We process personal data for the purpose of maintaining our customer relationships with the Users, for instance by contacting the Users regarding the Services and Events. We also process personal data of the Users in order to inform the Users of changes relating to the Services and the Events. We use personal data for marketing and advertising the services and products provided by us, e.g. to customize the User's experience by providing the User with targeted offers and advertising information based on the information gathered from the User during his/her previous visits to the Services and to the Events.

If the User contacts us to give feedback with respect to our Services or Events, we will use the provided information for answering questions and solving possible issues.

#### **3. For the recruitment and headhunting purposes**

We process User Data for the purpose of providing such data to our Recruitment Partners (as defined below) and our recruitment database for recruitment and headhunting purposes.

#### The legal basis for processing

We generally process personal User Data to perform our contractual obligations towards the Users with respect to the Users registered on our Website and Users having applied or registered as participants or attendees in the Events. The contract is entered into by and between the Company and the User according to the terms set forth in our Terms and Conditions available on the Website.

Furthermore, we process personal data based on our legitimate interest. Our legitimate interest is based on running, maintaining and developing our business, improving the customer or visitor experience of the Users as well as on performing direct marketing. When choosing to use your data on the basis of our legitimate interests, we weigh our own

Type of personal data	Source of personal data	Purpose of processing	Legal basis	Duration
Name (first and last name)	Submitted by the User	Identification of the User	Fulfillment of a contract	Until the User is registered on the Website
		Recording of the User's registration	Fulfillment of a contract	Until the User is registered on the Website
		Communication with the User	Fulfillment of a contract	Until the User is registered on the Website or until a potential claim is settled
		Creation of a contract, defining its contents and parties	Section 13/A. of the E-Commerce Act	Until the contract is terminated
		Claim enforcement	Legitimate interest of the Company	Until the lapse of the limitation period
		Submitting data to Recruitment Partners and our database	Consent of the User	Until the consent is withdrawn
E-mail address	Submitted by the User	Identification of the User	Fulfillment of a contract	Until the User is registered on the Website
		Recording of the User's registration	Fulfillment of a contract	Until the User is registered on the Website
		Communication with the User	Fulfillment of a contract	Until the User is registered on the Website or until a potential claim is settled
		Submitting data to Recruitment Partners and our database	Consent of the User	Until the consent is withdrawn
Date of birth	Submitted by the User	Identification of the User	Consent of the User	Until the User is registered on the Website
Gender	Submitted by the User	Identification of the User	Fulfillment of a contract	Until the User is registered on the Website
		Determining the type of Event merchandise needed	Fulfillment of a contract	
Nationality	Submitted by the User	Identification of the User	Fulfillment of a contract	Until the User is registered on the Website
Current address (country, city)	Submitted by the User	Identification of the User and basic statistical purposes	Consent of the User and legitimate interest of the Company	Until the User is registered on the Website
Dietary preferences	Submitted by the User	Catering to individual meal choices	Fulfillment of a contract	Until the User is registered on the Website
Highest education or current education	Submitted by the User	Identification of the User and basic statistical purposes	Consent of the User and legitimate interest of the Company	Until the User is registered on the Website
		Submitting data to Recruitment Partners and our database	Consent of the User	Until the consent is withdrawn
Data in connection with the Event (team, result, ...)	Submitted by the User	To provide and develop the Services and to organize and develop the Events	Fulfillment of a contract	Until the consent is withdrawn
Photos, videos recorded				
Users' complaints	Submitted by the User	To provide and develop the Services and to organize and develop the Events	Fulfillment of a contract	Until a potential claim is settled

interests against your right to privacy and e.g. provide you with easy to use opt-out from our marketing communications and use pseudonymized or non-personally identifiable data when possible.

In some parts of the Services, the Users may be requested to grant their consent for the processing of personal data. In this event, Users may withdraw their consent at any time.

### **Detailed information on the personal data processed**

During the course of the registration to the Website and the data processing the Company processes the following personal data of the Users:

During the course of the registration we mark the data with an Asterix, if the data is necessary to enter into the contract. The consequence of failure to provide these data is the you can not register to the Website.

### **In respect of the contractual partners of the Company**

<b>Type of personal data</b>	<b>Source of personal data</b>	<b>Purpose of processing</b>
Name (first and last name) of the contractual partner	Communication with the contractual partner	To maintain contacts, fulfill obligations and exercise rights
E-mail address of the contractual partner	Communication with the contractual partner	To maintain contacts, fulfill obligations and exercise rights
Position of the contractual partner	Communication with the contractual partner	To maintain contacts, fulfill obligations and exercise rights

## **4. COOKIES AND ANALYTICS SERVICES**

Analytics Data we gather in connection with the use of our Website includes for example the following data: (i) your IP address; (ii) device and device identification number; (iii) operating system; (iv) time of visit; (v) browser type and version; (vi) language setting.

### **Cookies**

We use various technologies to collect and store Analytics Data and other information when the Users visit the Website, including cookies and web beacons.

Cookies are small text files sent and saved on your device that allows us to identify visitors of the Website and facilitate the use of the Services and to create aggregate information of our visitors. This helps us to

improve the Services and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor the Services and the information we provide in accordance with the individual interests of our Users.

The Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

- [Safari](#)
- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)

Please note that some parts of the Services may not function properly if use of cookies is refused.

A web beacon is a technology that allows identifying readers of Website and emails e.g. for identifying whether an email has been read.

### **Web analytics services**

The Website use Google Analytics, Facebook Pixel and other web analytics services to compile Analytics Data and reports on visitor usage and to help us improve the Services.

Google Analytics, is a tool developed by Google Inc., (1600 Amphitheater Parkway, Mountain View, CA 94043, USA), and used worldwide, a so-called cookie used by third parties, that registers users' activity on the site, anonymously, that is, without identifying and without the identifiability of the specific user. With Google Analytics, the Company can receive visitor information and statements that can help enhance the Company's website or services. Such data may include the number of visitors to the website; information about where, from what other website, how did the visitor arrive; which pages of the website, and in what order they viewed, etc. Learn more about Google Analytics cookies on this [link](#).

Facebook Pixel tool allows us to understand and deliver ads and make them more relevant to you. The collected data remains anonymous and MPS cannot see the personal data of any individual user.

## **5. DO WE TRANSFER YOUR DATA OUTSIDE THE EEA?**

The Company stores the Users' personal data within the European Economic Area. We do not transfer your data outside the EEA.

However, we have service providers in several geographical locations. As such, we, and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile.

## **6. WHO ELSE RECEIVES YOUR DATA?**

We do not share personal data with third parties outside of the MPS organization unless one of the following circumstances apply:

### **For legal reasons**

We may share personal data with third parties outside our organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of the Company, the Users or the public in accordance with the law. When possible, we will inform the Users about such transfer and processing.

### **To authorized service providers**

We may share personal data to authorized service providers (data processors) who perform services on behalf of us ~~for us~~ (including data storage, sales, marketing and customer support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy. The following data processors are used by the Company in the provision of the services:

- Facebook Pixel;
- Google Analytics;
- Google Cloud Platform;
- GoDaddy;

### **With explicit consent**

We may share personal data with third parties outside our organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so.

During the application process to the Event on the Website, the User may grant us his/her consent to share some User Data (name, e-mail address, educational and work history) with the premium sponsors of the Event for recruitment purposes (the 'Recruitment Partners'). This data transfer is a core part of the



sustainability of the Event. The Recruitment Partner shall be considered an individual data controller in respect of the transferred User Data.

The User shall have to right of the withdrawal of consent relating to the transfers of User Data to Recruitment Partners. Such consent withdrawal relates solely to the future transfers of the User Data from us to such Recruitment Partners and not to the transfers having taken place prior to the withdrawal or the processing activities of the Recruitment Partners. The Recruitment Partners are solely responsible for their processing of User Data and the User shall contact the Recruitment Partners independently should he/she have questions relating to their processing activities or should he/she want to prohibit them from further processing the User Data.

## **7. YOUR RIGHTS AS A USER**

### **Right to access**

The Users have the right to access the personal data relating to them and processed by the Company. This means that the Users may contact us, and we will inform what personal data we have collected and processed regarding the said User and communicate the purposes such data are used for.

### **Right to withdraw consent**

In case the processing is based on a consent granted by the User, the User may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### **Right to rectify**

The Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed. By contacting us on the addresses indicated above, the User may update e.g. his/her contact details or other personal data.

### **Right to deletion**

The Users may also ask us to delete the Users' personal data from our systems. We will comply with such request unless we have a legitimate ground not to delete the data. Such legitimate ground may be based on e.g. applicable legislation.

### **Right to object**

You may have the right to object to certain use of your personal data if such data are processed based on the legitimate interest of us or a third person. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Services or to participate in the Events.

### **Right to restriction of processing**

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use the Services or to participate in the Events.

### **Right to data portability**

The Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

### **How to exercise your rights**

The above rights may be exercised by sending a letter or an e-mail to us on the addresses set out above. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

## **9. A LITTLE BIT ABOUT DIRECT MARKETING**

The User has the right to prohibit us from using the User's personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

## **10. IF WE HAVE A SERIOUS DEBATE, YOU CAN:**

The User can lodge a complaint with the local supervisory authority for data protection, in a member state of EU of his or her habitual residence, place of work or place of the alleged infringement, in case the User considers the Company's processing of personal data to be inconsistent with the applicable data protection laws.

In Hungary:

– Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) ("Hungarian Data Protection and Information Freedom Authority")

- 1125 Budapest, Szilágyi Erzsébet fasor 22/C
- Telephone: 1-391-1400
- fax: 1-391-1410
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- website: [www.naih.hu](http://www.naih.hu)

## **11. HOW DO WE PROTECT YOUR DATA?**

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, where appropriate, encryption, pseudonymization, firewalls, secure facilities and access right systems. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data. We regularly test the Website, systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of the Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.