

PRIVACY POLICY

Based on Act CXII on informational self-determination (hereinafter: Info Act) and to ensure the conditions required for compliance with data protection regulations and an adequate level of data processing security in accordance with 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, hereinafter: GDPR), Start House Consulting Kft. (registered office: H-1119 Budapest, Mohai út 26., Company number.: 01 09 359006, Tax number: 27958384143, hereinafter: Company or Controller) as data controller accepts to be bound by the content of this Privacy Policy and undertakes an obligation that its data processing relating to its activity complies with the expectations laid down by laws in force.

In all of its data processing activities relating to natural person users in connection with the services provided by the websites operated by the Company: <https://www.ryker.cc/> (hereinafter: "Website")

1. PURPOSE OF THE PRIVACY POLICY

The purpose of the Privacy Policy is for the Controller to inform the Data Subjects about how it acts in the course of processing their personal data.

2. INTERPRETATIVE PROVISIONS

Capitalized terms used in this Privacy Policy must be construed to have the meanings specified in this Privacy Policy, which correspond to the terms used in the Info Act and the GDPR.

Controller: The natural person or legal entity or unincorporated organization who/which, independently or together with others, specifies the purpose of data processing, adopts and executes the decisions regarding data processing (including the device used) or commissions a data processor to execute them.

Data processing: Any operation or set of operations executed on the data, regardless of the procedure used, in particular its collection, recording, entry, organization, storage, alteration, use, query, transmission, public disclosure, association or connection, blocking, erasure and destruction, as well as preventing further use of the data, making photo, sound or video records and recording the physical characteristics (e.g. fingerprint or palmprint, DNS sample, iris scan) suitable for identifying the person.

Processor: the natural person or legal entity or unincorporated organization who/which carries out the data processing based on contract, including contracts signed on the basis of legal provisions.

Data processor for the purposes of this Privacy Policy:

Start House Consulting Kft.

<https://www.ryker.cc/>

E-mail: info@ryker.cc

Head office: 1119 Budapest, Mohai út 26.
Company number.: 01 09 359006
Tax number: 27958384143

GDPR

GDPR: 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)

Third party: a natural person or legal entity or unincorporated organization who/which is not the data subject, the data controller or data processor.

Third country: every state which is not an EEA state.

Consent: voluntary and specific, properly informed expression of the data subject's intent by which he grants his unequivocal consent to the processing of his personal data, either as a comprehensive operation or certain operations only

Info Act: Act CXII of 2011 on Informational Self-Determination and the Freedom of Information.

Sensitive data: a) data relating to race, nationality, political opinion or party affiliation, religious or other worldview, union membership, sexual life, b) personal data relating to health, addictions, or criminal history.

The Controller does not request and does not process sensitive data. The Controller shall immediately erase from its system any sensitive data that has been disclosed to it or has come into its possession in any way.

Disclosure: making the data accessible to anyone.

Personal data: data which can be associated with the data subject – in particular their name, identification number, one or several pieces of information about their physical, physiological, mental, economic, cultural or social identity -, or conclusions about the data subject which can be drawn from the data.

Objection: the data subject's statement by which it objects to the processing of its personal data and requests termination of data processing and deletion of the data processed.

Website: webpage available on the website <https://www.ryker.cc/> operated by **Start House Consulting Kft.**

3. PRINCIPLES OF DATA PROCESSING

The Controller solely processes personal data for a pre-defined purpose, to exercise rights and comply with obligations. It records and processes data in a fair and legal manner. The Controller shall make efforts so that only such and so much personal data is processed as is

absolutely necessary for achieving the purpose. The Controller solely processes the personal data to the extent and time necessary. Data processed by the Controller is accurate and up-to-date, and the Controller immediately erases or rectifies any inaccurate personal data. The Controller applies adequate technical and organizational measures that ensure adequate security of the personal data, including protection against unauthorized or unlawful processing and against unintended loss, destruction or damage. Data processing activities that fall within the scope of this Privacy Policy are always related to the service provided by the Controller that is or was used by the Data Subject or for use of which it has made contact with the Controller.

Legal basis of the data processing

Personal data may be processed if:

the Data Subject has consented;

processing is necessary for the performance of a contract to which the data subject is party;

processing is necessary for compliance with a legal obligation to which the controller is subject;

processing is necessary in order to protect the vital interests of the data subject or of another natural person;

processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data;

ordered by the law or a legal decree or decree of a local municipality under authorization granted by the law within the scope specified therein, for purposes based on public interest (mandatory processing).

In the case of mandatory processing, the types of materials to be processed, the purpose and conditions of processing, access to the data, duration of the processing and the controller's identity are specified by the law or decree of the local municipality. Personal data may be processed also if it is impossible to obtain the data subject's consent or it would cause disproportionate expenses and the processing of personal data is required for compliance with a legal obligation of the Company, or to enforce a legitimate interest of the Company or a third party, and enforcement of such interest is proportionate to the legal restrictions associated with the protection of personal data.

If the data subject consents to the recording of his personal data, the Company may process the recorded data without requiring additional consent from the data subject – unless otherwise specified by law – for compliance with a legal obligation of the Company, or to enforce a legitimate interest of the Company or a third party, and enforcement of such interest is proportionate to the limitation of rights associated with the protection of personal data.

4. TECHNICAL BACKGROUND OF THE PROCESSING

The Company stores personal data electronically. In the case of computer-based data storage, the requirements of the information security policy issued by the Chief Executive Officer must be applied to the protection of personal data.

5. GENERAL DURATION OF PROCESSING

In the case of non-mandatory data, the processing takes place from the date when the data is provided until erasure of the data. Alteration or erasure of the data recorded in the course of preliminary identification may be requested by the data subject at the address info@ryker.cc

The provisions above have no impact on compliance with the retention obligations specified by law (e.g. accounting regulations).

6. PROCESSING PERFORMED BY THE COMPANY

6.1. Website

The Website database stores the Data Subject's data for the purpose of performing the free services provided upon registration, and the controller is not entitled to transfer it for any advertising use or other purposes in absence of the Data Subject's express consent.

During visits on the Website, we send one or more cookies – small information packages sent from the server to the browser then from the browser to the server on every request directed to the server – to the Data Subject's computer, through which its browser can be identified uniquely. These cookies operate exclusively to improve user experience, automate the access process and to measure the efficiency of our advertising activity. The Data Subject always has the right to prohibit data processing.

6.1.2. Cookies

Cookies collect information about visitors and their devices, they remember the visitors' individual settings that are or may be used for example when using online transactions, which means they do not need to be typed again, they make Website use easier and ensure a high-quality user experience.

To ensure a personalized service, a small data package, a so-called cookie is placed on the user's computer and read during later visits. If the browser returns a previously saved cookie, the service provider that manages the cookie can link the user's current visit with the previous visits, but only in what concerns its own content.

Mandatory session cookies

The purpose of these cookies is for users to be able to browse the Website fully and smoothly, to use its functions and the services available there. Such cookies are valid until the session (browsing) is ended, and once the browser is closed, cookies of this type are automatically deleted from the computer or other devices used for browsing.

6.2. Social media presence, external websites

When using social media sites, data processing takes place on the social media sites, therefore the duration and form of processing, the possibilities of erasing and changing data shall be governed by the regulations of the relevant social media site.

The Website may contain links to other websites, for the purposes of the data subject's convenience and information. These websites may be operated independently from the Company's Website. The referenced websites may have their own data protection statements or policies in place, therefore it is strongly recommended to review them if the

data subject visits such websites. If the referenced websites visited are not part of the Company's Website, the Company accepts no liability for their content, use, and data protection practices.

Processing related to the Controller's profile on social media sites is based on voluntary consent. The purpose of processing is to share the content located on the Controller's website on social media sites, to draw attention to it, and marketing.

Scope of data processed:

name – identification

photo used – identification

comments – expressing opinion and comments

rating – expressing opinion and sentiment

content of question/request – reply input data

All natural persons who visit or follow the Controller's social media pages, like/dislike any content placed on them, partially or fully share them with their own friends. The data is processed until unsubscribing.

6.3. Contact with clients

Purpose of data processing: To improve User experience and manage complaints, the Company provides a possibility on its Website for its future partners to contact the Company's employees who are designated for contact. Contact can be initiated by e-mail to info@ryker.cc

Legal basis of the data processing: Section 5 of the Info Act. The partners' data processing is classified as data within the scope of regulation, therefore it is not notified to the records of the data protection authority.

Duration of the data processing: until withdrawal of the Data Subject's consent.

The detailed rules of complaint management are laid down in the Complaint Management Policy.

6.4. Processing for direct business marketing and research purposes

The Controller may use the Data Subjects' personal data based on the Data Subjects' consent for the following purposes:

- sending advertisements by direct marketing, by e-mail or automated tools by phone;
- inquiry by e-mail or automated tools by phone, for market research and public opinion polling purposes;
- inquiry by e-mail or automated tools by phone, for data subject satisfaction measurement and service development purposes

The Data Subject's consent is a prerequisite to the use of the data as above. In each case consent is voluntary, and the Controller has no right to set it as a prerequisite to the signing of the contract.

The Data Subject may withdraw his or her consent to the data processing under this section any time without reason.

In every inquiry, the Controller will provide information about the fact that the Data Subject may withdraw his or her consent, and that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

6.5. Internal records about the Company's data processing and data transfers

The Company keeps a data processing and data transfer register of the data processing activities and related data transfer processes under Section 15 of Act CXII of 2011 on Informational Self-Determination and the Freedom of Information.

The documentation of the data processing and data transfer register is included in an annex to the data security and data protection policy.

7. USE OF A DATA PROCESSOR

Primarily the Controller and the Controller's internal staff have the right to access the data; however, they shall not disclose it, and, taking section 6.6 into account, they shall not transfer it to any third parties besides the data processors.

The Company may transfer data to data processor companies for the performance of system operation tasks and identification tasks. The processor shall make no decisions concerning the data processing without the controller's consent, and shall perform no processing for other purposes except as instructed by the controller, and shall perform its tasks solely on the basis of the controller's instructions. The Processor has an obligation to ensure the physical and software protection of the data to be processed, based on the rules laid down in the Company's data protection and data security notice.

8. RIGHTS OF THE DATA SUBJECT

At the data subject's request, the Company shall provide information about the data subject's data it is processing, the purpose, legal basis, duration of data processing, and the persons who may receive or have received the data and the purpose for which they have received it. The Company shall provide the requested information within 15 days from submission of the request, in writing.

9. GENERAL LEGAL REMEDIES

The data subject may send any processing-related inquiries or comments to the Controller's personnel and may obtain information about the processing of his or her data, and may request rectification, erasure or blocking of his or her personal data, via info@ryker.cc

The Controller erases the personal data if:

- it is processed illegally,
- it is incomplete or erroneous, and this situation cannot be remedied legally,
- the data subject requests so,
- the purpose of data processing has ceased or the statutory term for storing data has expired,
- it is ordered by court or by an authority.

Of the legally processed data, the Controller may transfer those which are required for the purpose of data processing:

for settlement of legal disputes, to bodies authorized to this based on law,
for national security, homeland defense, and protection of public security and
for prosecuting publicly prosecutable crimes, to the authority that has jurisdiction in such cases,
based on other legal provisions.

If the data subject does not agree with the data controller's decision or information relating to the processing of his or her personal data, or if the data controller misses the statutory deadline for sending a reply, the data subject may take the matter to court, or may contact the Hungarian National Authority for Data Protection and Freedom of Information, within 30 days from communication of the decision or missed deadline. Trial of the case falls within the jurisdiction of regional courts. If the court admits the petition, it may compel the data controller to provide the information, to rectify, block or erase the data, to annul the decision made by automatic data processing, to observe the data subject's right to objection, or to release the data.

Managing data breaches

The Company acknowledges that a data breach, in absence of adequate and timely action, may cause material and non-material damage to natural persons. To manage data breaches, it keeps a log of data breaches, in which the data protection officer records the circumstances of data breaches within no more than 72 hours from the reporting of the breach.

10. TECHNICAL BACKGROUND

The data controller shall select the IT devices used for providing the services for personal data processing and shall operate them in such way as:

the processed data is accessible to the authorized parties (availability);
authenticity and validation of the processed data are ensured (authenticity of data processing);
it can be certified that no change has been made to the data processed (data integrity);
the processed data is protected against unauthorized access (data confidentiality).
The Controller protects the data through adequate measures against illegal access, alteration, transmission, disclosure, erasure or destruction, or accidental destruction.

The Controller shall employ technical, management and organizational measures to ensure the protection of the security of data processing, that offer an adequate level of protection corresponding to the risks arising in connection with the data processing.

11. OTHER PROVISIONS

In each case where the Company intends to use the data supplied for a different purpose than that for which it was originally collected, it shall inform the user and obtain his or her prior express consent and provide him or her the possibility to prohibit such use.

The Company undertakes an obligation to ensure the security of the data, and shall take the technical measures that ensure that the data collected, stored, and processed is protected,

and shall use its best efforts to prevent its destruction, unauthorized use and unauthorized alteration. It also undertakes an obligation to instruct every third party to which it may transfer or transmit the data to comply with such obligations.