

# THE DATA MANAGEMENT NOTICE OF DAM INVISIBLE TECHNOLOGY PLC. ON THE PROCESSING OF PERSONAL DATA

## Table of Contents

<b>I.</b>	<b>The Data Controller</b> .....	3
<b>II.</b>	<b>Definitions</b> .....	3
<b>III.</b>	<b>Legal Basis for Data Processing</b> .....	5
	<b>Legal Framework</b> .....	5
<b>IV.</b>	<b>Purpose of Data Processing</b> .....	5
<b>V.</b>	<b>Data Processors and Authorized Recipients</b> .....	5
<b>VI.</b>	<b>Rights of the Data Subject and Remedies Related to Data Processing</b> .....	6
	<b>1. Rights of the Data Subject Regarding Data Processing</b> .....	6
	-Right to Information .....	6
	-Right to Rectification .....	6
	-Right to Erasure ("Right to be Forgotten").....	6
	-Right to Restriction of Processing.....	6
	-Right to Object .....	6
	<b>2. Remedies Available to the Data Subject</b> .....	7
	-Name and Contact Details of the Supervisory Authority.....	7
	-Initiating Legal Proceedings.....	7
	- Contact Options .....	7
<b>VII.</b>	<b>Data Security Measures</b> .....	7
<b>VIII.</b>	<b>Special Rules for Specific Personal Data Processing Activities</b> .....	8
	<b>Processing of Personal Data Related to the Use of Electronic Messages (Email)</b> .....	8
	<b>Scope of Stored Data</b> .....	8
	<b>Use of Information</b> .....	8
	<b>Processing of Personal Data Related to Phone Usage</b> .....	8
	<b>Call Recording</b> .....	9
	<b>Personal Data Processing for Job Applications at DAM Invisible Technology Zrt.</b> .....	9
	<b>Data Management of the IR:IS Mobile Application Owned by DAM Invisible Technology Zrt.</b> .....	9
	<b>Data Security</b> .....	10
<b>IX.</b>	<b>Cookie Policy: Use of Cookies, Types Applied, and Management of User Settings</b> .....	10
<b>IX.</b>	<b>Modification of the Privacy Policy</b> .....	10

DAM Invisible Technology Plc. pays special attention to the protection of personal data and compliance with mandatory legal regulations in the course of its activities. The company is committed to fair, transparent, and purpose-driven data processing, ensuring data minimization, accuracy, limited storage, integrity, confidentiality, and accountability.

## I. The Data Controller

Name: DAM Invisible Technology Zrt.  
Registered Office: 1118 Budapest, Budaörsi út 64.  
Mailing Address: 1118 Budapest, Budaörsi út 64.  
Email: [support@damit.hu](mailto:support@damit.hu)  
Central Phone Number: (+36-1 666 3 777)  
Website: <https://damit.hu/>

## II. Definitions

**Data Subject:** Any natural person identified based on specific personal data or any natural person who can be directly or indirectly identified.

**Personal Data:** Any information related to the Data Subject. A natural person is identifiable if they can be identified directly or indirectly, particularly by reference to an identifier such as a name, number, location data, online identifier, or one or more specific factors.

**Data Processing:** Any operation or set of operations performed on personal data or data sets, whether by automated or non-automated means. This includes collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or making available in any other way, alignment or combination, restriction, erasure, or destruction.

**Data Controller:** A natural or legal person, public authority, agency, or any other body that, alone or jointly with others, determines the purposes and means of processing personal data. If the purposes and means of data processing are determined by Union or Member State law, the data controller or specific criteria for its designation may also be determined by Union or Member State law.

**Data Processor:** A natural or legal person, public authority, agency, or any other body that processes personal data on behalf of the Curia.

**Consent of the Data Subject:** A freely given, specific, informed, and unambiguous indication of the Data Subject's wishes, by which they, through a statement or a clear affirmative action, signify agreement to the processing of their personal data.

**Data Breach:** A security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data that is transmitted, stored, or otherwise processed.

**IP Address:** A unique network identifier used for the identification of devices that utilize the TCP/IP network protocol for internet communication. Every device connected to the internet has a unique IP address, through which it can be identified.

**Cookie:** A data packet (file) generated by an internet content server and transmitted to a web browser. Cookies may contain information about searches performed on the given internet server and data entered by the user, which may also be stored on the server. The primary purpose of using cookies is to store user profile information, primarily preserving user preferences to ensure a familiar browsing experience.

The browser stores cookies in a dedicated directory on the user's device (computer, tablet, smartphone, etc.). A cookie uniquely identifies the user and their device, making them recognizable to the web server. Under the GDPR, cookies and other identifiers stored on a user's device are considered personal data.

**Web Beacon (Web Bug):** An invisible image embedded in websites or emails that allows user activities (such as opening a newsletter or clicking on links) to be tracked and measured. Web beacons are typically used alongside cookies to provide additional information for building user internet profiles.

**Internet Profiling:** Any form of automated processing of personal data by web servers that is used to evaluate characteristics related to a natural person. It may include information, findings, and conclusions about the user's interests, online activities, and the data they provide on the internet. In some cases, it can be beneficial for the user, as websites may appear in a way that aligns with their preferences and provide information relevant to their interests. However, it also opens the door to potential misuse (e.g., monitoring workplace activities, using information related to health or travel).

**Objection:** A statement by the Data Subject objecting to the processing of their personal data.

**Supervisory Authority:** An independent public authority established in accordance with Article 51 of the GDPR. In Hungary, this is the National Authority for Data Protection and Freedom of Information.

### **III. Legal Basis for Data Processing**

The provisions set out in Article 6 of the GDPR.

If the person providing the data shares another individual's personal data, they are obligated to obtain the prior consent of the Data Subject, the fulfillment of which is presumed by DAM Invisible Technology Plc.

#### **Legal Framework**

Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information

Act V of 2013 on the Civil Code (hereinafter: Civil Code)

Act C of 2012 on the Criminal Code (hereinafter: Criminal Code)

Act C of 2003 on Electronic Communications

Act C of 2000 on Accounting

Act CL of 2017 on the Rules of Taxation (hereinafter: Art.)

Instruction No. 18/2017 (XII. 20.) of the National Office for the Judiciary on the Press Communication Activities of Courts and the National Office for the Judiciary.

### **IV. Purpose of Data Processing**

The scope, purpose, legal basis, and duration of the processed personal data are detailed in Chapter VIII.

### **V. Data Processors and Authorized Recipients**

The processing of personal data is carried out by the authorized employees of DAM Invisible Technology Plc.

## **VI. Rights of the Data Subject and Remedies Related to Data Processing**

### **1. Rights of the Data Subject Regarding Data Processing**

#### **-Right to Information**

The Data Subject may request in writing, via the contact details provided in Section I, that DAM Invisible Technology Plc. provide information on:

- which of their personal data are being processed,
- on what legal basis,
- for what purpose,
- from what source,
- for how long.

Additionally, the Data Subject may request information on whom, when, under what legal basis, and which personal data DAM Invisible Technology Plc. has granted access to or transferred.

#### **-Right to Rectification**

The Data Subject may request in writing, via the contact details provided in Section I, that DAM Invisible Technology Plc. correct any inaccurate personal data concerning them or, if compatible with the purpose of data processing, complete any incomplete personal data (e.g., an updated email address or postal contact information).

#### **-Right to Erasure ("Right to be Forgotten")**

The Data Subject may request in writing, via the contact details provided in Section I, that DAM Invisible Technology Plc. delete certain personal data. However, the request cannot be fulfilled if DAM Invisible Technology Plc. is legally required to process the personal data.

#### **-Right to Restriction of Processing**

The Data Subject may request in writing, via the contact details provided in Section I, that DAM Invisible Technology Plc. restrict the processing of their personal data if any of the conditions set out in Article 18(1) of the GDPR are met.

#### **-Right to Object**

The Data Subject may object in writing, via the contact details provided in Section I, to the processing of their personal data for reasons related to their particular situation.

To exercise their rights, the Data Subject may submit a written request, which DAM Invisible Technology Plc. will review within 25 days from the date of receipt. Requests for rectification will be examined without delay.

If the legitimacy of the request is clearly established, DAM Invisible Technology Plc. will take the necessary measures and inform the Data Subject in the same manner as the request was submitted (electronically or in paper form). If the request cannot be fulfilled, DAM Invisible Technology Plc. will issue a reasoned decision and notify the Data Subject accordingly in the same manner as the request was submitted.

## **2. Remedies Available to the Data Subject**

The Data Subject may request information or submit inquiries regarding the processing of their personal data in writing via the contact details provided in Section I.

Upon receiving a request, DAM Invisible Technology Plc. will take the necessary measures within 25 days, or immediately in the case of a rectification request.

If no action is taken, DAM Invisible Technology Plc. will inform the Data Subject within 25 days of the reasons for the lack of action and of their right to file a complaint with the Supervisory Authority or seek legal remedy through the courts.

### **-Name and Contact Details of the Supervisory Authority**

Name: National Authority for Data Protection and Freedom of Information (NAIH)

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Mailing Address: 1530 Budapest, P.O. Box 5

Phone: +36-1-391-1400

Fax: +36-1-391-1410

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <http://www.naih.hu>

### **-Initiating Legal Proceedings**

In the event of unlawful data processing, the Data Subject may file a complaint with the Supervisory Authority or initiate civil proceedings against DAM Invisible Technology Plc. The case falls under the jurisdiction of the Budapest-Capital Regional Court. However, the Data Subject may also choose to initiate the lawsuit before the court competent for their place of residence.

### **- Contact Options**

If users have data protection concerns or require further information regarding their rights, they can contact DAM Invisible Technology Zrt. through the following channels:

Email: [support@damit.hu](mailto:support@damit.hu)

Phone: (+36-1 666 3 777)

## **VII. Data Security Measures**

DAM Invisible Technology Plc. protects personal data with appropriate measures against accidental or unlawful destruction, loss, alteration, damage, unauthorized disclosure, or unauthorized access.

Access to personal data, whether in paper or electronic form, is regulated to ensure that only designated employees may process the data for the intended purpose. DAM Invisible Technology Plc. has established specific authorization levels for data processing, protects its IT systems with firewalls, and ensures proper antivirus protection.

Access to electronically processed personal data is logged by the system in use, and records are maintained on any access or potential data transfers. Any data protection incidents are documented by the Curia and reported to the Supervisory Authority within 72 hours.

## **VIII. Special Rules for Specific Personal Data Processing Activities**

### **Processing of Personal Data Related to the Use of Electronic Messages (Email)**

The Data Subject has the option to contact DAM Invisible Technology Plc. via the email addresses available on its website. In such cases, DAM Invisible Technology Plc. processes the sender's email address.

If the email contains personal data of another individual, it is the responsibility of the sender to obtain the prior consent of the Data Subject. DAM Invisible Technology Plc. assumes that such consent has been obtained.

### **Scope of Stored Data**

On the web, we store voluntarily provided contact details (name, email address, company name, and area of interest) for a period of 12 months, unless the Data Subject specifies otherwise.

In contractual relationships, we store personal and company data as specified in the contract (e.g., users' names, email addresses, and phone numbers). These data are retained for the duration of the contractual relationship or as regulated by the specific contract.

### **Use of Information**

Voluntarily provided data on the web is used to clarify the professional aspects of the inquiry and to explore potential future cooperation.

Data received in contractual relationships is used in accordance with the contract during the provision of our services.

Data sharing and disclosure occur solely for the purposes and in the manner specified in this section. Exceptions apply to cases where DAM Invisible Technology Plc. is legally required to disclose data based on a binding statutory provision, regulatory or judicial order, or official directive.

### **Processing of Personal Data Related to Phone Usage**

The Data Subject has the option to contact DAM Invisible Technology Plc. via the phone numbers available on its website. In such cases, DAM Invisible Technology Plc. processes the caller's phone number, which is automatically deleted based on storage capacity.

DAM Invisible Technology Plc. does not use the caller's phone number for identification purposes. Personal data obtained in this manner is not shared with third parties, except in cases where disclosure is required by law or based on an official request.



## Call Recording

Please be advised that DAM Invisible Technology Plc. records customer service phone calls for quality assurance purposes. The recording and processing of voice recordings comply with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 of the European Parliament and of the Council) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

Voice recordings are retained strictly for the purposes defined by law and for the necessary duration of data processing. The purpose of data processing includes:

- Improving customer relations and service quality,
- Handling complaints and legal claims,
- Fulfilling legal obligations (e.g., complaint management under Act CLV of 1997 on Consumer Protection).

Recorded calls may only be accessed by authorized personnel and will not be disclosed to third parties unless required by law or official regulations.

You have the right to request information about the recording, request its deletion, or exercise other data protection rights in accordance with Articles 15-22 of the GDPR. For further details, please review our privacy policy or contact our Data Protection Officer at [dpo@damit.hu](mailto:dpo@damit.hu).

## Personal Data Processing for Job Applications at DAM Invisible Technology Zrt.

DAM Invisible Technology Plc. fills job vacancies through applications or public job postings. When an individual applies for a job opening, DAM Invisible Technology Plc., as the data controller, processes the personal data contained in the applicant's resume and cover letter in paper format.

The legal basis for processing personal data is the applicant's consent, which is considered given upon submission of the job application, as well as the company's legal obligations. DAM Invisible Technology Plc. does not share applicants' personal data with third parties.

## Data Management of the IR:IS Mobile Application Owned by DAM Invisible Technology Zrt.

This notice summarizes how the Data Controller collects and uses the personal data of users of the IR:IS smartphone application, developed for Android and iOS (hereinafter referred to as the "Application").

**Scope of Users:** The Application, developed by DAM Invisible Technology Plc., is strictly intended for use by employees and contracted partners of DAM Invisible Technology Plc. The following personal data provided by them is stored in the application:

- Email address
- Name
- Phone number

The purpose of our data processing is to ensure the provision of services available within the IR:IS mobile application, support the software we distribute and the services included therein, and facilitate communication with users.

The application stores personal data until the official termination of employment or contractual agreements. The provided personal data is never used for purposes other than those stated above. The disclosure of personal data to third parties is only possible with your prior explicit consent.

### **Data Security**

We store our clients' personal data in systems with the highest level of data protection, ensuring strict "need-to-have" access control principles, for as long as required to manage contracts or voluntary inquiries.

## **IX. Cookie Policy: Use of Cookies, Types Applied, and Management of User Settings**

Only the essential cookies required by Wix for the operation of the site are in use. These typically fall under necessary security and/or performance categories. A consent mode has been implemented on the site in compliance with v2 cookie consent regulations, allowing cookies to be enabled or disabled by category. Wix, as the hosting provider, stores analytical data for its own use, which is not shared with third parties.

### **Cookies Used:**

- XSRF-TOKEN: Helps ensure the security of the website by preventing Cross-Site Request Forgery (CSRF) attacks.
- hs: Set by Wix and used for security purposes.
- ssr-caching: A session cookie indicating how the site was rendered.
- svSession: Identifies unique visitors and tracks their sessions on the website, which is essential for Wix.
- Consent Policy: Saves visitor cookie preferences for future visits.

## **IX. Modification of the Privacy Policy**

DAM Invisible Technology Zrt. reserves the right to unilaterally modify this Privacy Policy at any time.

We continuously monitor changes in regulations and legal requirements, which we reflect on our website and in the privacy policy.