

## Privacy notice

### on website data processing – Baoba Europe Limited

#### 1. NAME AND DATA OF DATA CONTROLLER

**Name: Baoba Europe Limited Liability Company** (hereinafter: “Company”)

Registered office: 2131 Göd pesti ut 98/B/1

E-mail: hello@gobaoba.com

Web: gobaoba.com (hereinafter: „Website”)

Representative: Ludvig, Katalin CEO

#### 2. DEFINITIONS

##### 1. Data subject

The data subject is an identified or identifiable natural person. A natural person may be identified who, directly or indirectly, in particular by an identifier such as a name, number, location, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable.

##### 2. Personal data

Personal data means any information relating to any data subject.

##### 3. Data processing

Data processing means 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.

##### 4. Controller

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

##### 5. Processor

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### 3. RELEVANT LAWS

The following laws and regulations are relevant in relation to the data processing of the Company:

- Act CXII of Hungary (2011) on the Right of Informational Self-Determination and on Freedom of Information (**Info act**)
- Act V of Hungary (2013) on the Civil Code (**Civil Code**)
- Act CVIII of Hungary (2001) on Electronic Commerce and on Information Society Services (**E-commerce act**)
- 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) (**GDPR**)
- CONVENTION FOR THE PROTECTION OF INDIVIDUALS WITH REGARD TO AUTOMATIC PROCESSING OF PERSONAL DATA (**Convention**)

### 4. GENERAL INFORMATION

We will only process your data for the purposes of the data management purposes detailed below.

Your data will only be managed by our Company if you provide it voluntarily through our Website.

Please note that we may need to transfer your personal data to a third country, for which we ask for your explicit consent.

Please also note that you have the right to request information about your processed data at any time and free of charge, the right to rectification, erasure, restriction of data processing and protest, and if you believe that your personal data will not be processed in accordance with the GDPR, there is a possibility to file a complaint to the National Data Protection and Freedom of Information Authority (hereinafter referred to as "**NAIH**").

**The Personal Data of the Data Subjects - during the use of the website - is processed by our Company on the Website in relation to**

- (1) requesting information and handling reach outs,
- (2) Website visits (and cookie settings) and
- (3) newsletter and other direct marketing inquiries.

### 5. DATA PROCESSINGS OF THE COMPANY RELATED TO THE WEBSITE

#### 5.1 DATA PROCESSING RELATED TO INFORMATION REQUEST AND REACH OUTS

Following the successful cooperation with existing and future business partners, in particular insurance companies and investors, the Website makes available to get in direct touch.

scope of personal data	purpose of data processing	legal basis of data processing
surname and given name	It is essential for our Company to be provided by your name in order to fulfill your information request. If you do not provide your name, our Company will inform you that we cannot carry out the procedure without knowing your name, as we cannot identify you.	GDPR Section 6 (1) a)
E-mail	You need to enter your email address. If you provide your e-mail address, we will forward our Company's response.	GDPR Section 6 (1) a)
phone	You need to enter your phone number. If you provide the telephone number, our Company is entitled to contact you in order to clarify the request for information.	GDPR Section 6 (1) a)
Company	You need to enter on behalf of what legal entity you contact us. It helps to enhance the level of our response.	GDPR Section 6 (1) a)

addressees of personal data	duration of personal data processing
employees responsible for request-handling and information (plus data processors)	1 year from the response to a request for information, or the date of completion of the related procedure.

### 5.1.1. Legal basis of data processing

The legal basis for data processing is your consent. This constitutes a consent as per Section 6 (1) (a) of the GDPR sets forth. You give your consent by sending a letter, submission or referral to our Company for the purpose of requiring information.

### 5.1.2. Duration of data processing

Our Company processes personal data for 1 year after our Company has provided information or responded to you anyhow. If the Hungarian Data Protection Authority (hereinafter: "NAIH) or a court procedure is initiated in relation to the data concerned, we shall process your personal data until the final judgement of the legal proceedings concerned.

## 5.2. DATA PROCESSING RELATED TO ENTERING THE WEBSITE AND COOKIES

Cookies store unique computer and device IDs and profile information. Cookies are not suitable for the identification of Website visitors, but they are suitable for identifying and recognizing the computer or device used by the visitor to visit the Website.

The Website places a cookie on the visitors' computer for personalized service and reads it back on a later visit. If the browser returns a previously saved cookie, the cookie provider has the option to combine the visitor's browsing with the current and previous Website, but only for their own content.

The Website sends a request for permission to place cookies in the form of a pop-up window, which the user can allow by clicking on the "accept all cookies" button.

The cookies used in the Website can be divided into the following categories: **System, Analytics, Advertising, Custom**

The table below shows exactly what cookies the Company uses on the Website and what are their main features:

Cookie	Name	Purpose	Duration
System	necessary for the operation of the Website	Due to the operation of the system, it is essential to use some cookies. Examples are cookies used to log in or to monitor the upload process.	max 365 days
Analytics	<ul style="list-style-type: none"><li>- Google Analytics</li><li>- Tag Manager cookie</li><li>- Hotjar</li><li>- Mixpanel</li></ul>	The purpose of placing these types of cookies is to collect anonymous statistics about users and usage of the site.	max 2 years
Advertising	cookies of various advertising platforms of the Company	The Company uses various advertising platforms that can place cookies on the website. (Facebook, Google Ads, etc.) In addition, the site also uses these cookies for remarketing purposes.	max 365 days
Custom		We may also set other cookies to enhance the user experience.	max 365 days

The Company draws the users' attention to the fact that the Website may also contain links to pages that are not operated by the Company, but only for the information of visitors. The Company has no influence on the content and security of the websites operated by the partners. The Company hereby requests that the persons concerned review the privacy

statement of the sites they visit in advance before providing any personal data in any form on a given non-Company site.

### 5.3. DATA PROCESSING RELATED TO NEWSLETTERS AND OTHER DIRECT INQUIRES

The newsletter could be signed up on the Website.

The scope of personal data processed in connection with the newsletter service and inquiries qualifying as direct marketing, the legal basis of data management, the categories of data subjects and recipients

Scope of personal data	Legal basis of data processing	Categories of data subjects	Categories of addressees
name, e-mail	GDPR Section 6 (1) a)	Data subject subscribed for newsletter on Website.	Company employee responsible for newsletters and/or data processors

#### Purpose, duration and method of data processing

Purpose of personal data processing	Duration of personal data processing	Method of data processing
marketing, generating direct business leads	The Company processes the Personal Data until the consent is withdrawn.	Electronic

## 6. ACCESS TO PERSONAL DATA AND DATA PROCESSORS

### 6.1. Scope of persons entitled to access personal data

The personal data you provide may be accessed by Company employees, such as request handling staff, in order to perform their duties.

In addition, your data may be accessed by third parties acting on behalf of the Company, in particular a law firm with a contractual relationship with the Company.

### 6.2. Data transfer

We would like to inform you that your personal data may be transferred to a third country if this is necessary for exhausting our existing or future cooperation.

The Member States of the European Union and also Norway, Liechtenstein and Iceland, which are parties to the Agreement on the European Economic Area, grant data subjects the same rights under the GDPR as regards the protection of personal data and the exercise of the rights and freedoms of data subjects.

Pursuant to Article 45 of the GDPR, the European Commission identified the countries outside the European Union and the EEA Member States that have a decision on adequacy under Article

43 (3) of the GDPR and adequate guarantees for the processing of personal data under Article 46, and as regards the exercise of data subjects' rights, ie they regulate the protection of data subjects' personal data in the same way as the GDPR and provide adequate guarantees to enforce and protect data subjects' rights.

In accordance with Article 45 of the GDPR, the Commission of the European Union has published a list of the following countries that have compliance with Article 43 (3) and comply with Article 46 of the GDPR: Switzerland, Andorra, Argentina, Canada, Fårö, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Uruguay and United States. The official list is available here: [https://ec.europa.eu/info/law/law-topic/dataprotection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eucountries\\_en](https://ec.europa.eu/info/law/law-topic/dataprotection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eucountries_en)

If process personal data in a country that is not on the list published by the European Commission, your personal data will be transferred with your explicit consent.

Please note that in the event of a transfer to such a country, your data protection rights under the GDPR may not apply, and the resulting risk is brought to your attention.

The Company only transfers your personal data to state bodies and authorities, in particular courts, prosecutor's offices, investigative and violation authorities, and the NAIH, in exceptional cases and on the basis of legal obligations. For example, if the NAIH contacts our Company and asks for information about the processing of your personal data.

### 6.3. List of data processors

	Name	Registered office	Type of data processing
1.	Adroit Group Kft.	2000 Szentendre, Közúzó utca 2/A	IT development and server service
2.	Papp Dániel Botond law firm	1144 Budapest, Lőportár utca 20/B	legal support

Hereby, we declare that the Company uses only data processors that provide adequate guarantees under the GDPR and Info tv. and to implement appropriate technical and organizational measures to protect your rights.

A written agreement between our Company and the data processors sets out the rights and obligations related to data processing arising in connection with data processing, as defined in the GDPR.

## 7. PRIVACY BY DESIGN

We inform you that our Company shall take all necessary measures to protect your personal data, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, and becoming inaccessible due to changes in the technology used.

In the event of a privacy incident, we will report the privacy incident to NAIH without undue delay, no later than 72 hours after we become aware of the privacy incident, unless the privacy incident is not likely to jeopardize your rights and freedoms through the personal data we process.

We will notify you of a privacy incident without delay if it poses a high risk to your rights and freedoms. We classify the risk as high, for example, if we detect unauthorized intrusion into our IT network, or if the data processor detects and signals unauthorized intrusion to us and in particular detects unauthorized theft of personal data.

It is considered a data protection incident if the data stored by our Company is damaged, accidentally or despite a retention obligation, unlawfully destroyed, lost, unauthorizedly communicated to others, or accessed by anyone without authorization.

## 8. YOUR RIGHTS IN RELATION TO OUR DATA PROCESSING

### 8.1. Right to access and right to be informed

You may request written information from the Company through the contact details provided in Section 1 to be informed by the Company of:

- what personal data,
- on what legal basis and for what purpose the data management is carried out by the Company,
- if the data was not collected from you by our Company, from what source,
- how long the Company processes personal data or, if this is not possible, the criteria used by our Company to determine this period,
- to which supervisory authority you can lodge a complaint in case of a possible data breach,
- the right to request the Company to rectify, delete, restrict the processing of personal data concerning you and to object to the processing of such personal data,
- the circumstances, effects and measures taken to remedy the data protection incident,
- the name, address and data processing activities of the data processor,
- the recipients or categories of recipients to whom or with whom your personal data has been disclosed by the Company, and when, under what law, who provided access to your personal data or to whom you transferred your personal data.

The Company will fulfill your request **within a maximum of 1 month**, by letter or e-mail to the contact details provided by you, **free of charge**.

If your request is clearly unfounded or excessive, our Company is entitled to:

- refuse to act on your request, or
- charge a fee to ensure the recovery of postage and administrative costs incurred.

We consider your request to be excessive if it is of a recurring nature and we have already been informed about the above data and facts at least twice within a year, and the scope of our Company's activities and data management has not changed, so there has been no change in the lawfulness, reason and manner of data processing be.

We would like to inform you that in the event of a telephone inquiry on your part, which concerns the right to information, we can only provide general information. Our Company can only accept a request for information in writing (by email), otherwise we cannot determine for sure whether the request actually came from you.

### **8.2. Right to rectification**

You may, in writing, request that the Company change any of your personal data (for example, if you change your e-mail address or address) through the contact details provided in Section 1. The Company will fulfill your request within a maximum of 1 month and will notify you by letter or e-mail to the contact details you have provided.

In addition, through the contact details provided in Section 1, you may request in writing that the Company correct your inaccurate personal data about you. The Company will comply with your request without undue delay and will notify you by letter or e-mail to the contact details you have provided.

If you find that it is justified to supplement the incomplete personal data in order to achieve the data management objectives of our Company and thus to enforce your legitimate interest, you may request that our Company supplement the missing data with its records. To this end, we kindly ask you to send us your statement to the contact details provided in point 1, supplemented by your missing data, consenting to the processing of your data. Based on the supplementary statement, our Company will supplement your personal data with the data corresponding to the request without delay.

We will inform the person to whom we have communicated the personal data affected by the correction of the correction and the corrected data. If requested, we will provide the names and contact details of the persons to whom we have previously been informed as recipients of the data to be corrected to whom the data have been forwarded.

### **8.3. Right to erasure**

You may, in writing, request the Company to delete your personal data through the contact details provided in Section 1.

The Company will comply with your request within a maximum of 1 month and will notify you by letter or e-mail to the contact details you have provided.

With regard to data processing on the Internet, we inform you that our Company will make every effort to delete your data stored in search engines, if you have indicated it for us, at all possible access or storage points of the data.

Also, we will notify the person to whom we have communicated the deleted personal data of the deletion. If requested, we will provide the names and contact details of the persons to whom we have previously been informed as recipients of the data to be deleted, to whom the data have been transmitted.

### **8.4. Right to restriction of processing**

You may, in writing, request from the Company, through the contact details provided in Section 1, a restriction on the processing of your personal data.



This means that during the restriction period, we may only store your personal data, but we may not pass it on to any recipient, allow access to it, interrogate it, make it accessible, or delete or destroy it.

We inform the person with whom the personal data subject to the restriction has been communicated about the restriction of data processing. If requested, we will provide the names and contact details of the persons to whom we have previously been informed as recipients of the restricted data to whom the data have been transmitted.

### **8.5. Right to data portability**

You have the right to receive your personal data provided to us in a format that allows you to transmit it in an e-readable form.

Please note that according to the GDPR and also to the 2017 report of the Data Protection Commissioner, data controllers are not obliged to develop formats that allow data portability and to introduce or maintain technically compatible data management systems. The data subject is entitled to have the data transferred directly between the data controllers if this is technically feasible!

### **8.6. Right to object**

We inform you that your personal data will not be used by our Company for the purpose of business acquisition, public opinion surveys or scientific research and will not be transmitted for such purposes.

Nevertheless, we inform you that you may object in writing to the data processing through the contact details provided in point 1, if you believe that our Company would transfer or use your personal data for these purposes.

## **9. THE POSSIBILITY OF LEGAL ENFORCEMENT IN RELATION TO DATA PROCESSING**

Before initiating any procedure, please contact our Company through the contact details provided in Section 1 and send us your complaint. Our Company cooperates with you as a complainant, and if we find it justified based on the complaint, we will restore the lawful status immediately!

You also have the right to initiate NAIH proceedings and file a complaint if you believe that our Company violates GDPR requirements in the processing of your personal data.

To this end, we provide the contact details of the NAIH as follows:

**Name in HUN: Nemzeti Adatvédelmi és Információszabadság Hatóság**

**Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/c Postacím:  
1530 Budapest, Pf.: 5.**

**Central e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)**

**Website: <https://www.naih.hu/general-information.html>**

**Tel: +36 (1) 391-1400 Fax szám: +36 (1) 391-1410**

**Start point of online case initiation: <http://naih.hu/online-uegyinditas.html>**

In the event of illegal data processing experienced by you, you may also initiate a civil lawsuit against our Company. The trial falls within the jurisdiction of the competent „Törvényszék” (type of court in Hungary). The lawsuit can, if you choose, be brought before the court of your place of residence or stay (see the list and contact details of the courts at the following link: <http://birosag.hu/torvenyszekek> ).

## **10. AVAILABILITY OF OUR PRIVACY NOTICE**

Our privacy notice is continuously available and can be viewed electronically on the opening page of our Website specified in point 1 of this information.

If you contact us by phone, we will inform you verbally about the essential circumstances of data management, e.g.:

- data management takes place during our activities, during which
- what data
- how long
- what purpose we store as well as
- the possibility of possible legal enforcement related to our data management.

## **11. REVIEW OF THE PRIVACY NOTICE**

Our Company annually reviews the privacy notice to ensure that it complies with all legal requirements, as well as with the expectations and practical guidelines published by the NAIH.

This privacy notice enters into force on 1 February 2022.

Date of next review: 1 February 2023.