

## **Recngo Kft. Privacy Policy - Application**

Last updated August 10, 2020

### **Installation**

We consider the protection of your personal data to be of the utmost importance, therefore we would like to inform you, as a data controller, on the principles and rules that we are bound to follow and enfold as RECnGO Ltd. (8000 Szekesfehervár, Sereg u. 1. Fsz. 1.).

Through the use of the RECnGO application and the use of our services, your data will only be processed on the basis of priorly informing you and merely with your expressed consent. In addition, RECnGO will process data for the performance of the contract with you, for legitimate reasons or on the basis of an explicit legal requirement.

### **1. The security of your data, our privacy principles**

RECnGO will process your personal data in all respects in accordance with the legality, due process requirement, in the most transparent manner possible for you, for a specific, clear and legitimate purpose only and for a minimum of time required to achieve the objective. We take great care to ensure that the data we process is always accurate and up-to-date.

### **2. The type of data we process**

#### **a) Application and server „logging”**

Upon using the application of RECnGO, the server automatically logs user’s activity. Without this, the proper functioning of the application would not be ensured and we would not be able to prevent possible external attacks, therefore such processing is based on legitimate interest of RECnGO. The log file is used for quality assurance purposes, we do not link it to other information, as we do not seek to identify the user concerned.

Data stored: IP address (anonymised), approximate geographical location, address of the pages visited, and date and time data.

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- Storage duration: data is deleted after 30 days.

#### **b) App analytics measurement**

- We do measurements and analysis related to the activities of users.

- Firebase, as a third-party provider, helps to independently measure the application's usage and other app analytics data. The data is recorded in an anonymized manner and is used by RECnGO solely for statistical purposes or to optimise the operation of the site. For more information on how measurement data is handled, please visit the following link: <https://firebase.google.com/docs/analytics>. App analytics for such statistical purposes is a widespread practice to which you consent by using our application.

When using the application, on the log-in / create account page by pressing the " I agree to the Privacy Policy" button on the policies warning you can give your consent to the use of persistent datas.

#### **d) Newsletter subscription**

By signing up for RECnGO's newsletter, I agree to RECnGO contacting me directly through e-mail and/or other communication channels with advertising messages related to the services, programs (e.g. webinar) it provides and for this purpose, my personal data is processed in accordance with the Privacy Policy Statement.

RECnGO makes every effort to ensure that by making use of its services, through a highly customer-focused communication, you will be part of a greater user experience.

Providing a service that meets your needs and expectations in all respect, will be much easier for us if you subscribe to our newsletter on our website.

By registering on the application, \*.recngo.hu, \*.recngo.com, website, you consent to the processing of the following information: e-mail address, name, title, gender, year of birth, residence (country), postcode, individual needs (e.g. webcast notification).

If you consent to us contacting you directly for marketing purposes either during or after subscribing, it will allow us to – with the above mentioned information – provide you with up-to-date and highly personalised offers that reflect your needs as a user.

You can access and freely manage your personal data through your own user account at any time. The email you provide is the most authentic channel of communication for us, therefore in order to modify that, you can only do so by sending a request to the [privacy@recngo.com](mailto:privacy@recngo.com) e-mail address.

The information you provide will only be processed in connection with the conduct of our activities and only until you withdraw your consent, unless otherwise we are entitled or obliged to process the data on any other legal basis.

### **3. Rights of data subjects and how they are enforced**

Letters, queries regarding the following claims should be sent to the [privacy@recngo.com](mailto:privacy@recngo.com) e-mail address.

- You may at any time request RECN GO to inform you whether your data is being processed and, if so, to provide adequate access to the personal data it handles. By entering your user profile, you have direct access to your personal data, but you may still request written information about the processing of your personal data at any time. Please note that the request for information sent by e-mail may only be considered authentic by RECN GO if it is sent from the user's registered e-mail address, but this does not preclude RECN GO from identifying the applicant by other means before providing the information.
- If you find that the personal data, we process about you do not correspond to reality, you may request that the personal data we process be rectified. If you are a registered user, you can change your data yourself through your user profile.
- You may request the deletion of the personal data we process at any time. Erasure may be refused (i) for the purpose of exercising the right to freedom of expression and information, or (ii) if the processing of Personal Data is authorised by law and (iii) to submit, enforce or defend legal claims. In all cases, the RECN GO shall inform the data subject of the refusal of the request for erasure, indicating the reason for the refusal of the cancellation. Once the request for the deletion of personal data has been fulfilled, previous (deleted) data can no longer be recovered.
- You may request that the processing of your personal data be restricted by RECN GO if you dispute the accuracy of the personal data processed. In this case, the restriction applies to the period of time that allows us to verify the accuracy of personal data. You can also request a restriction on the processing if the processing is unlawful or has already been proceeded, but you object to the deletion of the personal data processed and instead request that their use be restricted.
- The data provided by you and processed by RECN GO in an automated manner,
- The personal data provided by you and processed by RECN GO in a widely used, machine-readable format, at your request, is subject to RECN GO's release and/or transfer to another controller.
- You may object to the processing of your personal data at any time (i) if the processing of personal data is necessary solely to fulfil the legal obligation of controllers (RECN GO) or to pursue the legitimate interest of the controller or third party; (ii) where the purpose of the processing is direct marketing, public opinion or scientific research; or (iii) where the processing takes place in order to perform a task of general interest. RECN GO examines the legality of the objection and, if it establishes the merits of the objection, terminates the processing.

#### 4. Data processors

On behalf of RECN GO, personal data is processed by processors with a contractual relationship with us. The processor shall not take an independent decision on the data, only in accordance with the provisions of the RECN GO contract and based on the instructions received. Our data processors have been selected to ensure the security of your personal data as much as possible when processing your data. We ask all of our processing partners for compliance with applicable law with a contractual declaration and only if they do so, they may carry out any processing on behalf of RECN GO. See below for a current list of our processors;

- **Mailchimp**  
The Rocket Science Group, LLC  
675 Ponce de Leon Ave NE  
Suite 5000

Atlanta, GA 30308 USA

- **Google**  
Dublin  
Gordon House  
Barrow St  
Dublin 4  
Ireland
- **LumiSys Kft.**  
1011 Budapest, Hunyadi János út 5.  
23951110-2-41
- **Rackforest**  
1132 Budapest,  
Victor Hugo u. 18-22.  
14671858-2-41

## 5. Law enforcement options

If you need more information, please contact us at the [privacy@recngo.com](mailto:privacy@recngo.com) e-mail address, at 8000 Szekesfehervár, Sereg u. 1. Fsz. 1. address by post. Please note that if you submit your request for data processing in person, our colleagues may ask you to verify your identity.

You can contact the National Data Protection and Freedom of Information Authority directly (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

If the rights of the data subject are violated, he may apply to a court. The tribunal is responsible for the examination of the case. The action may, at the choice of the data subject, be brought before the tribunal of the place of residence or residence of the person concerned.

RECnGO may at any time, upon unilateral decision, amend this Privacy Notice. If this involves a change in the principles or purpose of the processing, he/she shall obtain the consent of the data subject in advance for further processing.