

PRIVACY STATEMENT

ACCORDING TO THE DATA PROCESSING OF FATHOM MINDS LIMITED LIABILITY COMPANY

- in force from 1st March 2019 -

1. INTRODUCTION

- 1.1 We would like inform you about the information of data procession of **FATHOM MINDS LIMITED LIABILITY COMPANY** (hereinafter referred to as: „**Company/Controller**”) hereby.
- 1.2 The Company carries out so-called *software development* services, in particular, programming and software development activities customized to the specific needs of customers contracted by the Company.
- 1.3 This privacy statement contains substantial information about the process of your personal data.
- 1.4 The purpose of this privacy statement is to provide the Controller with accurate information about the personal data and details of data management handled in compliance with its activities. The Controller handles personal data only for a specific purpose, to exercise the right and fulfil the obligation.
- 1.5 Please read this privacy statement regularly, as its modifications will automatically apply to the personal information you process, even if a previous privacy statement was in force at the time your personal information was processed.
- 1.6 We publish the amended privacy statement on our website and notify you in any other way, depending on the source of your data.
- 1.7 Our website is: www.fathomminds.com (hereinafter referred to as: „**Website**”).
- 1.8 If the data management is implemented on our website, you agree to the terms of this privacy statement by using the Website. If you do not accept the privacy statement, please do not use the Website.
- 1.9 If the data management is not carried out on our website, you give your consent - notwithstanding the method of data collection - to your personal data contained in this privacy statement - and in accordance with the legislation referred to in point 1.11.
- 1.10 This privacy statement applies only to the personal data of the natural persons Data Subject, in accordance with the data of legal persons or other entities that do not qualify as legal persons are not personal data.
- 1.11 The following legislation shall be applied in regard of data protection:
- 1.12 The Regulation of the European Parliament and of the Council (EU) 2016/679 (General Data Protection Regulation; known as GDPR) The text of the regulation is available here:

<http://eur-lex.europa.eu/legalcontent/HU/TXT/HTML/?uri=CELEX:32016R0679> HYPERLINK "http://eur-lex.europa.eu/legalcontent/HU/TXT/HTML/?uri=CELEX:32016R0679&from=EN"& HYPERLINK "http://eur-lex.europa.eu/legalcontent/HU/TXT/HTML/?uri=CELEX:32016R0679&from=EN"

You can read the text of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: Infotv.) here:

<https://net.jogtar.hu/jogszabaly?docid=A1100112.TV>

2. APPOINTMENT OF THE CONTROLLER

- 2.1 Name of Controller: Fathom Minds Limited Liability Company
- 2.2 Seat of Controller: H-1052 Budapest, Kristóf tér 3. I. emelet, Hungary
- 2.3 Registration number of Controller: 09-09-026698
- 2.4 Tax number of Controller: 25126974-2-09
- 2.5 Managing director of the Controller Company: Vámosy István Győző managing director
- 2.6 Telephone number of Controller: +36-30-812-50-61
- 2.7 E-mail address of Controller: info@fathomminds.com

3. GENERAL INFORMATION

- 3.1 The primary legal basis for data management by the Company as Controller is the voluntary consent of the Data Subject and fulfilment of the contractual obligation.

The Data Subject is entitled to withdraw his/her consent at any time in case of data processing based on the consent, which, however, does not affect the legality of the data management prior to revocation.

The Controller shall retain the data relating to proof of the consent until such time as it is necessary to prove the consent or other legitimate interest of the Controller.

- 3.2 The Data Subject is responsible for the reality and accuracy of the personal data granted by him/her. The Controller does not verify the authenticity of the personal data provided.
- 3.3 The Controller is not responsible for processing false or untrue data provided by the Data Subject, or due to false or untrue information provided by the Data Subject or for damages to the Data Subject or to third party. The Controller shall not be liable for any misrepresentation of the Controller regarding the capacity of the Data Subject.

- 3.4 Granting of consent shall be regarded a) in case of the Website using the Website, registering on the Website or otherwise providing personal data, b) in any other cases, by any other verifiable means by the Data Subject (in written, electronic mail, fax, image and / or sound recording, etc.).

In case of a legally incapable Data Subject under the age of 14 years, only his/her legal representative may provide personal information on behalf of the Data Subject. In order to provide personal data of the Legally Incapable User, a declaration by the legal representative is required.

For the personal data process of a minor with limited legal capacity under the age of 16 years, a declaration by the minor's legal representative is required.

The legal representative of the minor aged 16 and above is not required to give consent or post-approve the valid declaration of the data process (e.g. to provide a contact on the Website or provide his/her personal data by any other means)

- 3.5 The consent of the Data Subject shall be considered to be granted in respect of the personal data that has disclosed or made public in relation to public activities.

- 3.6 In the absence of any other statutory provisions, The Controller only manages the personal data made available to him/her for the purposes and to the extent necessary for the purposes described in this statement.

- 3.7 The Controller process special data (e.g. health status data, criminal personal data) only with a separate written consent and only if it is required during the selection of the specific job offer to be applied for. The Controller assumes responsibility for the process of any special data made known without explicit request.

- 3.8 Data Manager does not collect personal data for marketing purposes and does not send a marketing request.

4. SPECIFIC PROCESSING

4.1 Operating and using the Website for natural persons:

- 4.1.1 Range of Data Subjects: Persons who visit the Website of the Controller or who use the messaging and contacting menus of the Website.

- 4.1.2 Purpose of the process: Receiving employee applications for the Company's job offers.

- 4.1.3 Range of processed data:

- Name, e-mail address of Data Subject;

- Storing the web address / URL associated with the LinkedIn profile of the Data Subject without recording, storing, and managing individual profile information;
- Details of the CV forwarded by the visitor Data Subject;
- The IP address that is automatically recorded by the website and belongs to the computer of the Data Subject, the starting date of the visit of the Data Subject and, in some cases, the type of browser and operating system depending on the configuration of the computer, and the geographic location to be determined by the IP address. Automatically recorded data cannot be linked to other personal data. Data management is for statistical purposes only.

4.1.4 Plea of the process: consent of the Data Subject

4.1.5 Host Service Provider: Amazon Web Services Inc.
(1200 12th Avenue South, Suite 1200, Seattle, Washington, USA)

4.1.6 Measurement of visitor numbers: Google Analytics; Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)

4.1.7 Duration of data management: Until deletion of the content provided by the Data Subject and the withdrawal of consent.

4.1.8 Others: data is required to make contact. Please refer to our cookie information detailed in point 9 for information collected while browsing the website.

4.2 Operating and using the Website for legal entities requesting and contracting the Company:

4.2.1 Range of Data Subjects: Persons who visit the Website of the Controller or who use the messaging and contacting menu points of the Website.

4.2.2 Purpose of the process: Allow the Company to contact the legal entities requesting individual orders/contracts.

4.2.3 Range of processed data:

- Name of legal entity;
- E-mail address of legal entity;
- Name of the legal entity contact point (natural person);
- E-mail address of the legal entity contact point (natural person);
- The IP address that is automatically recorded by the website and belongs to the computer of the Data Subject, the starting date of the visit of the Data Subject and, in some cases, the type of browser and operating system depending on the configuration of the computer, and the geographic location to be determined by the IP address. Automatically recorded data cannot be linked to other personal data. Data management is for statistical purposes only.

4.2.4 Plea of the process: consent of the Data Subject

4.2.5 Host Service Provider: Amazon Web Services Inc.
(1200 12th Avenue South, Suite 1200, Seattle, Washington, USA)

- 4.2.6 Measurement of visitor numbers: Google Analytics; Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)
- 4.2.7 Duration of data management: Until deletion of the content provided by the Data Subject and the withdrawal of consent.
- 4.2.8 Others: data is required to make contact. Please refer to our cookie information detailed in point 9 for information collected while browsing the website.

4.3 Data management related to contracting with legal persons:

- 4.3.1 Data Subjects: The contact persons of legal entities that conclude a contract with the Controller;
- 4.3.2 Purpose of the process: to fulfil the contractual obligations of the Controller;
- 4.3.3 Range of processed data: Name of the contact person of the legal entity natural person, e-mail address and service details;
- 4.3.4 Plea of the process: Obligation to perform the contract and to fulfil the legal obligation to issue and retain accounting records.
- 4.3.5 Duration of the process:
- Recording the data of the contractual partner Data Subject: 5 years after the termination of the contract.
 - Invoices: 8 years after the termination of the contract on the basis of the retention obligation for the accounting documents, but during this time the Controller will not use the data for any other purpose without consent.

5. PROCESSING

- 5.1 A data processor is a natural or legal person or any other authority that processes personal data on behalf of the controller.
- 5.2 Data processing does not imply the power to determine with respect to the data, the data processor implements the controller's decisions of data management.
- 5.3 The Controller informed the persons and tasks of the data processors in connection with the detailed information related to each data processing (point 4).
- 5.4 In special cases, the Controller may also use other data processor(s) providing information about the person(s) in the given conditions of participation.
- 5.5 The data processor may not make a substantive decision concerning the data management, who may process the personal data it has received only in accordance with the provisions of the Controller and may not process data for its own purposes. The data processor shall store and preserve the personal data in accordance with the provisions of the Controller.

6. TRANSFER OF DATA

6.1 The Controller shall use data processed by itself, referring to point 4.1 for the purpose of fulfil the contracts in order to perform tasks related to certain orders of the Controller with an employee / trustee that is suitable for the project customer (contracted partner of Controller).

6.2 The Controller is entitled and obliged to forward to the competent authorities all personal data at its disposal and stored in accordance with the law, which is required by law or by a legally binding authority. Due to such data transfer and the resulting consequences, the Controller cannot be held responsible.

7. SECURITY OF DATA

7.1 The Controller ensures data security in accordance with the applicable regulations.

7.2 In particular, the Controller will take technical and organizational measures in the area of data security measures and also establish procedural rules to ensure that the processed data is protected against unauthorized access, alteration, transmission, disclosure, deletion, destruction, accidental destruction or damage against becoming inaccessible as a result of technical changes already have been used.

7.3 The Controller shall take account of individual progress in technological development when it determines and applies data security measures. Among several possible data management solutions, the Controller chooses a higher level of protection, unless it would be a disproportionate difficulty for the Controller. The Controller also applies these requirements to data processors.

7.4 The Controller undertakes to ensure inviting any third party to whom the data may be forwarded or transferred and draw the attention to the commitments above. addition, in the case of legal data transmission by the Controller, it shall not be liable for any damage caused by the recipient.

7.5 The Controller is obliged to comply with the principles above regarding data management and data security on the basis of all its employees, employment relationships or other legal relationships.

8. RIGHTS OF THE DATA SUBJECT RELATING TO THE PROCESS OF PERSONAL DATA

8.1 The Data Subject may request any information at any time specified in this statement about the data process concerning him or her. The Data Subject may request the rectification, deletion or restriction of the data concerning him or her and may also object to the process of such personal data. The Data Subject has the right storage the data as well.

The Controller shall inform the Data Subject about the measurement taken following the request without undue delay, but in any case within one month of receiving the request.

If necessary, considering the complexity of the requests and the number of requests, this deadline may be extended with additional two months.

The Controller shall provide information on the extension of the deadline by indicating the reasons for the delay within one month when the request is received.

If the request has been received electronically, the information shall also be provided by electronic means, unless otherwise requested by the Data Subject.

If the Controller considers that he or she does not need to take actions following the request of the Data Subject, he / she will inform the Data Subject of the reasons why it could not if it did not without delay and at the latest within one month from the receipt of the request. The Data Subject may have the opportunity to complain and may also have recourse to judicial review.

8.2 Requests are free of charge, however, if the application is clearly unfounded or, especially due to its repetitive nature, the Controller may charge a reasonable fee or refuse to execute the request, subject to the administrative costs arising from the request.

8.3 If there is reasonable doubt as to the identity of the Data Subject at submitting the request, further information may be requested to confirm the identity of the Data Subject.

8.4 At the request of the Data Subject, the Controller shall provide information on whether the processing of his/her personal data is in progress. If so, the personal data of the Controller managed by him/her or for the purposes of data management, the categories of data concerned and the recipients or categories of recipients with whom personal data have been or will be communicated, access to the data for the intended duration of the data processing or to the criteria for determining the duration, and information on the source of data.

8.5 Upon request, the Controller shall give a copy of the personal data subject to data management available to the Data Subject. Reasonable fees based on administrative costs may be charged for additional copies requested by the Data Subject.

If the Data Subject has submitted the request by electronic means, the information shall be made available in a widely used electronic format, unless otherwise requested by the Data Subject.

8.6 The Data Subject may request the correction of inaccurate data and the right to request the addition of incomplete data.

8.7 The Data Subject may request that the Controller shall delete the personal data if: a) they are no longer needed for the purpose for which the data processing has taken place; b) if the Data Subject withdraws the consent and the data processing has no other plea; (c) the information specified in paragraph 8.13 under the terms of this clause; d) the data processing is illegal; e) they must be deleted in order to fulfil the legal obligation to the Controller; f) a minor under the age of 16 years.

8.8 The Controller deletes the data for the requests above, unless further data processing is a) exercising the right to freedom of expression and information, b) fulfilment of the legal obligation to the Controller provided, c) submitting, enforcing or protecting legal claims are also required.

8.9 At the request of the Controller, it restricts the data management if a) the Data Subject disputes the accuracy of the personal data, in which case the restriction refers to the period of time that allows the accuracy of the data to be checked; and requests the restriction, c) the Controller no longer needs the data to be processed, but the Data Subject requests it for the submission, validation or protection of legal claims; in which case the restriction applies to the period until it is determined whether the legitimate reasons of the controller has priority over the legitimate reasons of the Data Subject.

- 8.10 If, as stated above, data management is subject to limitation, such personal data may be processed only with the consent of the Data Subject, or for the submission, validation or protection of legal claims, or for the protection of the rights of another person, or for the important public interest of the Union or a Member State. The Controller shall inform the Data Subject requesting it in advance of the lifting of the restriction.
- 8.11 The Controller shall notify the Data Subject about the rectification, deletion or restriction, as well as all those to whom the data was previously transmitted. The Controller ignores the notification if this is impossible or requires a disproportionate effort. If the Controller has disclosed personal data and it is obliged to delete it, it will take reasonable steps, including technical measures, to take into account the cost of the technology and implementation, in order to inform the controllers that the Data Subject has requested them the deletion of links to personal data or of such personal data.
- 8.12 The Data Subject may object to the processing of the personal data: a) if it is based on a legitimate interest; in this case, the data processing may not be continued unless there are legitimate reasons of overriding reasons relating to the interests, rights and freedoms of the data subject, or for reasons relating to the bringing, enforcing or defense of legal claims; connected to it; in this case, the data management cannot be continued for this purpose. The 9.2-9.4 points also apply to protest.
- 8.13 On the basis of the right to data storage, the Data Subject may, on the one hand, request from the Controller, if technically feasible, the personal data of the managed person in a widely used, machine-readable format, and forward it to any data controller itself, and may request the data transfer from the Controller.
- 8.14 If the Controller fails to comply with the above-mentioned request of the Data Subject, he/she shall inform the reasons thereof at the latest within one month from the receipt of the request.
- 8.15 If the Data Subject has found that his / her personal data rights have been violated, please submit your complaint to the Controller at one of the contact details below.
- 8.16 You can also contact the authority regardless of the Controller's notification. If you decide so, you may report to the authority at the following contacts:
- Hungarian National Authority for Data Protection and Freedom of Information, Address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / C. Mailing address: 1530 Budapest, Mailbox: 5. Telephone: +36 -1-391-1400 Fax: + 36-1-391-1410 E-mail: ugyfelszolgalat@naih.hu
 - If you may experience unlawful data management, you can initiate a civil lawsuit. Judicial review is within the jurisdiction of the tribunal. You may also initiate a lawsuit before the court of your place of residence (see the list and contact details of the courts on the following link: <http://birosag.hu/torvenyszekek>).

10. COOKIES

- 10.1 The purpose of cookies is to collect information about visitors and their devices: note the custom settings of visitors that will be used, for example, when using online transactions, therefore typing again is not needed. It makes it easy to use the website, providing a quality user experience. In order to provide customized service, a small data packet, called cookie, is available on the user's computer, puts a cookie and reads it at a later visit. If the browser returns to a previously saved

cookie, the cookie provider has the option of linking the user's current visit to the previous one, but only for its own content.

- 10.2 The session cookies are absolutely necessary to allow visitors in order to browse the Website completely and seamlessly, to use its features and the services available there. The validity period of this type of cookie runs until the session (browsing) ends, and when you close the browser, this type of cookie is automatically deleted from the computer or from any other device used for browsing.

11. MISCELLANEOUS PROVISIONS

- 11.1 Changes to the privacy statement are posted on the Website. The current privacy statement applicable always to the processing of personal data, even if the Data Subject and the Controller were still in the process of entering into a previous privacy statement.

- 11.2 Contact: If you have any questions, comments or requests regarding this privacy statement, would like to complain or want to exercise the rights set out in point 8, please contact us at the following contact details:

Name of Company: Fathom Minds Limited Liability Company, Contact Name: Vámosy István Győző; Contact E-mail: istvan.vamosy@fathomminds.com; Contact telephone number: +36-30-812-50-61; Company mailing and central address: H-1052 Budapest, Kristóf tér 3. I. emelet, Hungary

- 11.3 This privacy statement has been prepared in English and Hungarian languages. In the event of any discrepancies between the Hungarian and English versions, the Hungarian version shall prevail.

Force: This privacy statement is applicable from 1st March 2019.