# **Privacy Policy**

Webtown-Informatika Kft built the Vacamo app. This SERVICE is provided by Webtown-Informatika Kft and is intended for use as is.

This page is used to inform visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Service.

If you choose to use our Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that we collect is used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy.

### **Information Collection and Use**

# The identity of the data controller and the place of data processing

Data controller: Webtown-Informatika Kft.

address: H-1117 Budapest, Hauszmann Alajos utca 3. B. ép.

tax number: 13644387-2-43 contact: info@webtown.hu

represented by: Péter Kalmár managing director

Place of data processing: the registered seat of the Company, or the place of work of the data processor, employee. The employees of the Company have access to the personal data processed in connection with the use of the application only to the extent necessary for the performance of their tasks, the provision of the service used by the data subject, and for answering questions and providing information.

# 3. Registration to access the application

For a better experience, while using our Service, we may require you to provide us with certain personally identifiable information. The information that we request will be retained by us and used as described in this privacy policy.

purpose of data processing: by using the system, individuals and organisations can register to manage, review, and approve annual leaves

**scope of processed data:** name of individual or organisation, registering person; user name, email address; the description and number of days of the annual leave types used in the organisation; which user applied for permission for which type of leave, whether it has been granted and by whom.

legal basis for data processing: consent pursuant to Article 6(1)(a) of the GDPR

deadline of data storage: as a general rule, the personal details of the user will be deleted within 30 days of account deletion. Exceptions to this are possible enforcements of rights or claims, statutory retention obligations, cases of any proceedings by court, prosecutor's office, investigative authority, any authority with competence to proceed in the case of infringement,

public authority, National Authority for Data Protection and Freedom of Information, or other bodies authorised by law, until these proceedings are finally concluded.

After the investigation of the data subject's request to the Company to delete the corresponding personal data, if the request is justified, the personal data will be deleted from the system immediately. Exceptions to this are data processing for the purpose of archiving out of public interest, scientific or historical research, as specified in Article 89 of the GDPR, or possible enforcements of rights or claims, cases of any proceedings by court, prosecutor's office, investigative authority, any authority with competence to proceed in the case of infringement, public authority, National Authority for Data Protection and Freedom of Information, or other bodies authorised by law, until these proceedings are finally concluded.

**method of data storage:** the personal data of the data subject is stored by the Company in electronic form

# Rights related to data processing

If the data subject considers that the data processing violates the provisions of the GDPR or considers the way in which the Company processes the personal data to be infringing, we recommend first to contact the Company with any complaint. The complaint will be investigated in all cases

The Company's data protection policy is available by clicking on the following link: https://webtown.hu/hu/adatkezeles

Contact details of the data protection officer: <u>info@webtown.hu</u>

If, despite your initial complaint, you continue to complain about the way the Company processes your data or wish to contact an authority directly, you may file a complaint with the National Authority for Data Protection and Freedom of Information (address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c, postal address: H-1530 Budapest, Pf.: 5. Email: ugyfelszolgalat@naih.hu, website: www.naih.hu).

You have the option of going to court to protect your data, which will act in an accelerated procedure in the case. In this case, you are free to decide whether to bring an action before the court of your permanent or temporary address (<a href="http://birosag.hu/torvenyszekek">http://birosag.hu/torvenyszekek</a>).

The app does use third party services that may collect information used to identify you.

Link to privacy policy of third party service providers used by the app

- Firebase Analytics
- Google Analytics

# Log Data

We want to inform you that whenever you use our Service, in a case of an error in the app we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics.

### **Cookies**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use these "cookies" explicitly. However, the app may use third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

#### Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related services; or
- To assist us in analyzing how our Service is used.

We want to inform users of this Service that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

### Security

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

#### **Links to Other Sites**

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

# Children's Privacy

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

# **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

# **Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at info@webtown.hu.