

Privacy Notice

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This Privacy Notice ("**Privacy Notice**") provides you with the information regarding the processing of your personal data carried out by **Imimot Korlátolt Felelősségű Társaság** a company registered in Hungary by the Tribunal of Budapest Region (our company registration number is 19-09-525844; our registered office is at Hungary, H-8200 Veszprém, Aranyoskút utca 2; our registered VAT number is 24696979-2-19; our email address is: mail@imimot.com," **Controller**", "**We**" or "**Us**") via the Imimot.com website ("Website") provided by Us.

Please be aware that no data protection officer is operating in relation to data processing carried out by Us.

When We process your Personal Data on the basis of our legitimate interest You have the **right to object** to that processing (for further explanation, see section IV). If You wish to exercise this right, please contact Us at the email contact details specified above.

Definitions used in this Notice

In this section you can find the definitions for the purpose of this Privacy Notice.

Personal Data: means any information relating to you through which We can identify you directly or indirectly; it means in particular your name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of yours;

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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

You: means any user of the website or the application whose data is processed by Us.

Data Processor: means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of Us.

I. Data Processing Principles

- a. We process your Personal Data in compliance with all the relevant laws, fairly and in a transparent manner.
- b. We process your Personal Data only for specified and legitimate purposes as described in this Privacy Notice.
- c. We do not process your Personal Data, which is not adequate, relevant, or necessary for the purposes set out in this Privacy Notice.
- d. We do our best to keep your Personal Data accurate and up to date. We take every reasonable step to ensure that inaccurate Personal Data is erased or rectified without delay.
- e. We keep your Personal Data in a form which enables Us to identify You for no longer than needed, for the purposes for which your Personal Data is processed.
- f. We process your Personal Data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

II. Why, and how are We processing your Personal Data?

In most cases, We are processing your Personal Data in order to provide You with our services. However, other purposes may apply (e.g., to fulfil our statutory obligations). Please find detailed information on the purpose and other relevant circumstances of processing categorized by the purposes below.

We will always process your Personal Data in compliance with the highest European standards on data protection. We provide an adequate level of protection to your Personal Data by E.U. standards, even in cases when We transfer your Personal Data outside the European Economic Area ("EEA").

Please note, that in the event of any inquiries coming from state, administrative or investigative authorities, We may be obliged to provide these authorities with your Personal Data if they request Us to do so.

Please note, furthermore, that if We process your Personal Data in order to perform a contract concluded between us or our legal obligations, and You do not provide such Personal Data to Us, then we will not be able to fulfil our legal obligations or our contractual obligations towards You.

We do not carry out any automated decision-making or profiling activities while processing your Personal Data, unless directly stated otherwise in our information provided to You.

a. Operating the Website

The purpose of processing your Personal Data: Logging the activity of the users to ensure operation of the Website.

The legal basis for the processing: our legitimate interest of Imimot to operate the Website, as described in Section 13/A (3) of *Act CVIII of 2001 on electronic commercial services, and on specific issues concerning information society services*.

You have a right to object to this data processing activity, as stated under the description of the right to object in section IV. below.

The categories of personal data concerned: date, time, address of the visited page, type of the operation system on the computer of the user, IP address of the computer at the time of visit, browser kind.

The period for which the personal data will be stored: We will store the relevant Personal Data for no longer, than one year.

The recipients of the Personal Data:

Name	Details	Category
Rackforest Kft. (Victor Hugo str. 18-22, III./3008, 1132 Budapest, Hungary)	We are using Rackforest Kft. As the technical operator of the website.	Data Processor

b. Newsletters and direct marketing offerings

The purpose of processing your Personal Data: Informing our users about Imimot news, and our best offers.

The legal basis for the processing: your consent.

The categories of personal data concerned: Data provided by You.

The period for which the personal data will be stored: We will store the relevant Personal Data until you revoke your consent (i.e., unsubscribe from our newsletter).

The recipients of the Personal Data:

Name	Details	Category
MAILERLITE UAB (Lithuania, 11341 Vilnius, Paupio g. 46)	We are using Mailerlite to send you monthly updates and monthly newsletter.	Data Processor

c. Customer support, and contacting us via e-mail

The purpose of processing your Personal Data: We use Help Scout (<https://www.helpscout.net/>) to provide more efficient and timely support to You when using our services.

The legal basis for the processing: our legitimate interest in fulfilling our contractual obligations, and increasing your loyalty by helping You to fix unintended functioning of our services and addressing your questions in an efficient and timely manner.

You have a right to object to this data processing activity, as stated under the description of the right to object in section IV. below.

The categories of personal data concerned: Data provided by you, your IP address.

The period for which the personal data will be stored: This data will be deleted 5 years following the day your issue is resolved.

The recipients of the Personal Data:

Name	Details	Category
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Help Scout Inc. (131 Tremont Street, 3rd Floor Boston, MA 02111-1338, USA)	We are using Help Scout for customer support purposes.	Data Processor
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d. Licence management

The purpose of processing your Personal Data: Activating the licence keys to our software products, monitoring that the use of the software is in accordance with the end user licence agreement.

The legal basis for the processing: Performance of the contract concluded between us.

The categories of personal data concerned: MAC address of your computer, computer serial number, hardware UUID, USB dongle serial number (if applicable), e-mail address, name of the computer, number of computers where the licence was activated, order id, customer name, purchase date.

The period for which the personal data will be stored: The data is stored until you delete the licence from your computer, or request us to do so.

The recipients of the Personal Data: We do not share your Personal Data

e. Crash management

The purpose of processing your Personal Data: Logging crash events for troubleshooting.

The legal basis for the processing: Performance of the contract concluded between us.

The categories of personal data concerned: data of the computer, relevant logs, user e-mail address (optional), user-name.

The period for which the personal data will be stored: the data is stored until the technical issue is resolved, but no longer than one year.

The recipients of the Personal Data:

Name	Details	Category
37signals, LLC. (2045 W Grand Ave Ste B, PMB 53289, Chicago, IL 60612, USA)	We are using Basecamp for crash management.	Data Processor

f. Services improvement

The purpose of processing your Personal Data: optimizing our process to design and test the new versions of our services based on how our users use our services.

The legal basis for the processing: our legitimate interest in improving our services and retain our customers.

The categories of personal data concerned: Operating system version, computer model, language, RAM, license validity, computer serial number.

The period for which the personal data will be stored: 2 years from the date of the last launch of our services.

The recipients of the Personal Data:

Name	Details	Category
Rackforest Kft. (Victor Hugo str. 18-22, III./3008, 1132 Budapest, Hungary)	We are using Rackforest Kft. As the technical operator of the website.	Data Processor

III. Data Processors

Please note, that We are using Data Processors for business related support services and these Data Processors receive your Personal Data for the purpose of providing Us with such services. Section II. above describes the Data Processor We use.

We always ensure that appropriate and suitable safeguards are in place when we transfer Personal Data, outside the EEA, in particular to the USA. We ensure that standard contractual clauses issued by the European Commission are concluded with our Data Processors outside the EEA. You may obtain a copy of these safeguards by contacting us at the email contact details specified above.

IV. Your rights regarding the Data Processing carried out by Us

You have the following rights regarding Data Processing carried out by Us in relation to your Personal Data:

- *right to access*

You have the right to request from Us access to your Personal Data processed by Us and obtain information regarding the purpose of processing, what

categories of Personal Data are processed, for or towards who We are transferring or disclosing your Personal Data, for what period We are processing your Personal Data, your rights in connection with data processing carried out by Us regarding your Personal Data, your right to lodge a complaint with a supervisory authority regarding the processing. Additionally, in the case We collect your Personal Data from other sources than from You, any available information as to the source, and the existence of automated decision-making and related information, including the logic involved, as well as the significance and the envisaged consequences of such processing for You, whether your Personal Data is transferred outside the EEA, and the conditions of these transfers.

We provide You with a copy of your personal Data processed by Us in case You require Us to do so.

- *right to rectification*

You have the right to request Us to rectify your inaccurate Personal Data and to request Us to complete your incomplete Personal Data by means of providing Us with a supplementary statement.

- *right to erasure*

We erase any of your Personal Data without delay if You request Us to do so in the event of the following:

- a. Your Personal Data is no longer necessary for the relevant purpose;
- b. You withdraw your consent and there is no other legal basis for the processing;
- c. You object to the processing and there are no overriding legitimate grounds for the processing;
- d. Your Personal Data has been processed unlawfully;

e. Your Personal Data has to be erased according to relevant laws

- Please note that We are entitled to not erase your Personal Data if it is necessary - among others - for exercising the right of freedom of expression and information, compliance with legal obligation, establishment, exercise or defense of legal claims.

- *right to restriction of processing*

You have the right to obtain from Us restriction of processing where one of the following applies:

- f. You have contested the accuracy of your Personal Data, for a period enabling Us to verify the accuracy of your Personal Data;
- g. the processing is unlawful, and You oppose the erasure of your Personal Data and request the restriction of their use instead;
- h. We need no longer your Personal Data for the purposes of the processing, but they are required by You for the establishment, exercise or defense of legal claims.

- You objected to the processing and the verification is pending whether our legitimate grounds override yours.

Where processing has been restricted, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.

- *right to object to processing*

Where Personal Data is processed for direct marketing purposes, You have the right to object at any time to the processing of Personal Data concerning You

for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You also generally have the right to object to the processing of Personal Data where the legal basis of the processing activity is Our legitimate interest, or the legitimate interest of a third party. We will no longer process the Personal Data unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

- *right to data portability*

You have the right to receive your Personal Data, which You have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from Us, if certain conditions apply. You also have the right to have your Personal Data transmitted directly from Us to another controller, where technically feasible.

- *right to withdraw your consent*

You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on your consent before its withdrawal.

We take actions requested in relation to exercising your above rights without undue delay and in any event within one month of receipt of your request. This period may be extended by two months where necessary, with a reasoned notification to You, taking into account the complexity and number of requests.

In the event when You make such a request by electronic means, We provide You with information by electronic means where possible, unless You request otherwise.

In case We do not take any action regarding your request, We inform You as to the reasons within one month of receipt of your request. We take the necessary actions

regarding exercising your rights in relation to the processing free of charge except when your request is manifestly unfounded or excessive.

In case We have reasonable doubts as to the identity of the natural person making the request, We may request additional information necessary to confirm the identity of such person.

V. Remedies

In case You would not agree with our response or action or if You consider that your rights have been infringed, You have the possibility to lodge your complaint with the data protection supervisory authority in the EU Member State of your habitual residence, place of work or place of the alleged infringement, in particular, the Hungarian National Authority for Data Protection and Freedom of Information (address: HU-1055 Budapest, Falk Miksa utca 9-11, mailing address: 1363 Budapest, Pf. 9.; tel.: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: <http://naih.hu/general-information.html>) or file a lawsuit against us.

V. Miscellaneous

Please note that We review this Privacy Notice on occasions and amend it as necessary. In case We amend this Privacy Notice, We announce and publish it by the usual means (e.g., via e-mail, or on the Website). We would like to encourage You to review this Privacy Notice occasionally.