

DATA PROTECTION NOTICE

1. Purpose of the notice

The purpose of this notice is to set out the data protection and data processing policy applied by

SmartFlow CRM Limited Liability Company

Registered seat: 2131 Göd, Termál Fürdő körút 47. 1st floor 3.

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Web: www.smartflowcrm.com

Email: info@smartflowcrm.com

Represented by: Maxim Várpalotai, Managing Director

(hereinafter: the **Data Controller**), and to ensure that the Data Controller's partners, visitors of the website www.smartflowcrm.com, as well as other natural persons affected by data processing, receive proper information regarding the processing of their personal data. The Data Controller is committed to fully complying, in the course of its activities, with the provisions of this notice and with the requirements of the legislation relating to the processing of personal data set out below.

When establishing these rules, the Data Controller took into particular consideration

- ✓ the Fundamental Law of Hungary
- ✓ Act V of 2013 on the Civil Code (hereinafter: the Civil Code);
- ✓ Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act);
- ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).

This data protection notice is available on the website www.smartflowcrm.com and also at the Data Controller's registered seat.

2. Definitions used in this notice

Data Processing: the performance of technical tasks related to data processing operations.

Data Processing (Data Processing / Processing): any operation or set of operations performed on data, regardless of the procedure applied, in particular collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, restriction, erasure and destruction, as well as preventing further use of the data, and the making of photo, audio or video recordings.

Data Controller: the natural or legal person, or an organisation having legal personality, who or which, alone or jointly with others, determines the purposes of the processing of data, makes and implements decisions regarding data processing (including the means used), or has it implemented by a processor engaged by it.

Data Transfer: making data accessible to a specific third person.

Erasure of Data: rendering data unrecognisable in such a way that its restoration is not possible.

Personal Data Breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data transmitted, stored or otherwise processed.

Pseudonymisation: the processing of personal data in such a manner that, without the use of additional information, it can no longer be established to which specific natural person the personal data relates, provided that such additional information is kept separately and technical and organisational measures are taken to ensure that the personal data cannot be linked to identified or identifiable natural persons.

Data Subject: the natural person whose personal data are affected by the processing.

Third Party: a natural or legal person, or any other body, which is not the same as the Data Subject, the Data Controller, the processor, or those persons who, under the direct authority of the Data Controller or the processor, have been authorised to process personal data.

Consent: a freely given and specific indication of the Data Subject's wishes, based on appropriate information, by which the Data Subject signifies agreement, by a statement or by a clear affirmative action, to the processing of personal data relating to him or her—either in full or with respect to certain operations.

Personal Data: data that can be linked to an identified natural person—especially the person's name, identification mark, and one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity—as well as any conclusion drawn from the data relating to the Data Subject, which does not qualify as data of public interest or data made public on grounds of public interest. Personal data include, among others, the name, home address and e-mail address.

Objection: a statement by the Data Subject by which he or she objects to the processing of his or her personal data and requests the termination of the processing and/or the erasure of the processed data.

Website: www.smartflowcrm.com

3. Principles of data processing

The processing carried out by the Data Controller complies with the data processing principles of the GDPR, which are as follows:

Principle of lawfulness, fairness and transparency: Personal data must be processed lawfully and fairly, and in a transparent manner in relation to the Data Subject.

Principle of purpose limitation: Personal data must be collected only for specified, explicit and legitimate purposes, and must not be further processed in a manner that is incompatible with those purposes.

Principle of data minimisation: Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Principle of accuracy: Personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

Principle of storage limitation: Personal data must be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed.

Principle of integrity and confidentiality: Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Principle of accountability: The Data Controller is responsible for compliance with the principles and must be able to demonstrate such compliance.

In addition to the principles of data processing, the requirement of appropriate information can be identified as a common requirement, since the Data Controller must inform Data Subjects about the data processing in any case, irrespective of the legal basis of processing.

4. The individual activities involving data processing, the definition of the processed data, the legal basis, purpose, and duration of processing

4.1. Contact

By means of the e-mail addresses indicated under the “Contact” menu item of the Website, the Data Controller provides the Data Subject with the possibility to contact it.

The contact request is received by the competent employee of the Data Controller.

The personal data made available electronically are stored on a server in electronic form.

Identification of personal data processed	the Data Subject’s name, e-mail address, telephone number, and other personal data voluntarily provided by the Data Subject
Purpose of processing	contact between the Data Subject and the Data Controller
Legal basis of processing	the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes – GDPR Article 6(1)(a)
Duration of processing	the personal data provided by the Data Subject will be erased without delay if the contact does not lead to a result.

4.2. Cookies

A cookie is a small text file that is stored on the hard drive of the Data Subject’s computer or mobile device for the period of time set by the cookie, and is reactivated upon subsequent visits. Its purpose is to record information related to the visit and personal settings; however, these are data that cannot be linked to the visitor as a person. It helps to create a user-friendly website and to enhance the Data Subject’s online experience.

If the Data Subject does not consent to the Data Controller’s use of cookies while the Data Subject browses the website, it may happen that the website will not function fully. The Data Subject has the possibility to choose, even individually, from among cookies with the functions described below.

Necessary cookies

These cookies ensure the proper operation of the Website and facilitate its use; without them, convenient use of the Website is more difficult or not ensured at all. These cookies collect information about the use of the Website without identifying visitors. Among them, some are deleted as soon as the visitor closes the browser (session cookies), while others are stored by the visitor’s device and/or browser until their storage period expires or the visitor deletes them (persistent cookies). Cookies are automatically placed on the user’s devices when browsing the Website. They can subsequently be deleted independently in the browser settings.

Functional cookies

These cookies enable special functions and personalisation. Cookies are placed by the Data Controller or by a third party whose services the Data Controller has included on the Website. If the Data Subject does not allow the use of these cookies, the aforementioned functions may not operate properly.

Analytics cookies

Analytics cookies serve to understand how visitors interact with the website. These cookies provide assistance regarding the number of visitors, bounce rate, traffic source, etc. These cookies do not identify Data Subjects; the information collected by them relates to, for example, which part of the page the visitor clicked on, how many pages or sites the visitor visited, how long the viewing time of each session was, what error messages occurred, etc. Among analytics cookies, persistent cookies and session cookies are also distinguished depending on how long they are stored in the visitors’ browser and/or device. Analytics cookies are automatically placed on the Data Subject’s devices when browsing the websites. They can subsequently be deleted in the browser settings.

Performance cookies

These cookies relate to the performance and development of the Website and to improving the user experience, and they enable the Data Controller to collect data about how visitors use the Website.

Advertising cookies

These cookies ensure the efficient operation of the Website and also that marketing is up to date. Targeted cookies are also useful for Data Subjects, since through them the Data Controller can display advertisements on the Website that may be interesting and relevant to users. These cookies are thus used by the Data Controller to track visitors' activity on the website, and their purpose is none other than enhancing the user experience and supporting online marketing activities.

Beyond the Data Subjects' IP addresses, the Data Controller does not store in cookies, nor does it transfer to third parties, any personal data that the Data Subject provided during the use of the Website and/or during registration; in these cookies the Data Controller stores only data that identify the Data Subject's activity on the Website. Cookies can be deleted by the Data Subject from his/her IT device, and they are also deleted automatically upon closing the browser—depending on the device settings—and the Data Subject may also manually set his/her browser to prohibit the use of cookies.

Identification of personal data processed	exclusively the Data Subject's IP address; in addition, the Data Controller stores all analytics information without name or other personal data
Purpose of processing	identification of Website visitors as Data Subjects; automatic recording of usage habits via cookies, the purpose of which is enabling and/or facilitating the session, improving user experience, personalisation, and statistical data collection.
Legal basis of processing	the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes – GDPR Article 6(1)(a)
Duration of processing	the Data Subject may delete cookies stored on his/her computer or mobile phone at any time through his/her browser settings

4.3. Social media presence

The Data Controller operates the following social media pages:

- it manages the <https://www.facebook.com/smartflow.crm.kft> page on Facebook;
- it manages the <https://www.instagram.com/smartflow.crm> page on Instagram;
- it manages the <https://www.linkedin.com/company/smartflow-crm> page on LinkedIn

Identification of personal data processed	the Data Subject's name and image
Purpose of processing	providing information about current information, news affecting the Data Controller, and content relevant for Data Subjects
Legal basis of processing	the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes – GDPR Article 6(1)(a)
Duration of processing	the Data Subject may voluntarily unsubscribe from following the pages, or may delete undesired news appearing on the wall using the wall settings.

4.4. Data processing during invoicing

Data processing is carried out for the purpose of issuing an invoice in accordance with legislation and fulfilling the accounting document retention obligation.

Identification of personal data processed	the Data Subject's name, address of residence and/or place of stay, telephone number, e-mail address
Purpose of processing	issuing an invoice and fulfilling the accounting document retention obligation
Legal basis of processing	processing is necessary for compliance with a legal obligation to which the Data Controller is subject (GDPR Article 6(1)(c))
Duration of processing	8 years pursuant to the Accounting Act

4.5. Data processing during contract conclusion and performance

If a contract is concluded between the Data Controller and its partners, the parties designate in the contract the natural persons acting as contact persons and their contact details. During data processing activities related to the performance of contracts, no joint controllership takes place; each controller processes only the data relating to its own contracts.

Identification of personal data processed	the Data Subject's name, telephone number, position and e-mail address
Purpose of processing	contact between undertakings, performance of the contractual obligations
Legal basis of processing	processing is necessary for the performance of a contract to which the Data Subject is party, or in order to take steps at the request of the Data Subject prior to entering into a contract (GDPR Article 6(1)(b))
Duration of processing	for eight (8) years from the termination of the Data Controller's legal obligation based on the contractual relationship between the Data Controller and the Data Subject

4.6. Handling of references and customer opinions

The Data Controller provides the possibility for customers who use the service, as Data Subjects, to post opinions, ratings and references regarding the Data Controller's work on the Website. The publication of a reference is in all cases voluntary and takes place exclusively on the basis of the Data Subject's prior, explicit consent. The Data Controller publishes only such data as were provided by the Data Subject and for the disclosure of which the Data Subject has given explicit consent.

Identification of personal data processed	the Data Subject's name, position, indication of company name, the textual content of the opinion, and his/her image
Purpose of processing	presentation of the Data Controller's services, displaying customers' opinions, strengthening trust in the service
Legal basis of processing	the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes – GDPR Article 6(1)(a)
Duration of processing	until the withdrawal of the Data Subject's consent, and/or until the time when the reference is justified in the Data Controller's communication

5. Processors

5.1. The Data Controller uses the following processors during the processing of personal data:

Name of processor	Contact details	Tasks
Meta Platforms Ireland Limited	Ireland, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2.	Facebook, Instagram
Google Ireland Limited	Ireland, Gordon House, Barrow Street, Dublin 4.	Google Analytics
Rackhost Informatikai Zrt.	6722 Szeged, Tisza Lajos körút 41.	hosting service
Tárhely.Eu Szolgáltató Kft.	1144 Budapest, Ormánság utca 4. X. em. 241.	hosting service

5.2. The processors' activities related to data processing consist of providing the technical background. Processors may not make substantive decisions affecting data processing; personal data that come to their knowledge may be processed exclusively in accordance with the Data Controller's instructions; they may not process data for their own purposes, and they must store and retain personal data in accordance with the Data Controller's instructions.

The Facebook privacy policy is available at the following link:

<https://www.facebook.com/privacy/explanation>

The Instagram privacy policy is available at the following link:

<https://help.instagram.com/519522125107875>

The Google privacy policy is available at the following link:

<https://business.safety.google/compliance/>

The Tárhely.eu privacy notice is available at the following link:

https://tarhely.eu/dokumentumok/adatvedelmi_szabalyzat.pdf

The Rackhost privacy notice is available at the following link:

<https://www.rackhost.hu/privacy-policy>

6. Data transfer

The Data Controller, as a general rule, does not transfer the data, personal data that come into its possession to third parties in any manner without the Data Subject's prior consent, except where the Data Subject has expressly consented thereto or where it is prescribed by law.

7. Data security

The Data Controller stores the personal data specified above in its IT system. The Data Controller undertakes to ensure the security of data in accordance with the GDPR and the Info Act, taking into account the rights of Data Subjects.

It keeps records of any personal data breaches and, if necessary, informs the Data Subject about such breaches and, where necessary, the National Authority for Data Protection and Freedom of Information (NAIH).

Access to personal data is granted to those persons acting within the scope of the Data Controller—thus in particular agents and employees—who need it to perform their activities and who are aware of and understand the obligations related to data processing.

The Data Controller takes all necessary measures to ensure secure, damage-free processing of data and the establishment and operation of the data processing systems required for this. The Data Controller ensures that unauthorised persons cannot access, disclose, transfer, modify, erase or delete the processed data.

The Data Controller undertakes to ensure the security of data with the most modern and most appropriate equipment and security rules, with particular regard to preventing unauthorised access to data, and to preventing data from being unlawfully disclosed, erased or destroyed. It takes all measures within its power to ensure that data are not accidentally damaged or destroyed. The above undertaking is also prescribed by the Data Controller for its employees participating in data processing activities. The Data Controller does not collect special categories of data, i.e., data revealing racial origin, national or ethnic origin, political opinions or party affiliation, religious or other philosophical beliefs, trade union membership, health status, addictions, sexual life, or criminal record.

8. The Data Subject's rights during data processing

Within the duration of data processing, the Data Subject has the following rights:

Right to information

The Data Controller must provide information in an appropriate manner, in simple and comprehensible language, and in an easily accessible form (online or offline) regarding the essential aspects of data processing. At the time of obtaining personal data, or if the Data Subject subsequently requests information, when providing such information, the Data Protection Notice must be made available to the Data Subject, and a statement acknowledging that the Data Subject has become acquainted with, understood and accepted the contents thereof must be signed by him or her.

The Data Subject is entitled at any time to request information about his or her personal data processed by the Data Controller. Information may also be requested by e-mail or by post at the e-mail address indicated in this notice. The Data Controller must provide the requested information within 30 days on the basis of the request.

Right to erasure

The Data Subject is entitled to request that the Data Controller erase personal data relating to him or her without undue delay, and the Data Controller is obliged to erase personal data relating to the Data Subject without undue delay. If the Data Controller has granted access to the data requested to be erased to third persons, it must inform all those to whom the personal data were disclosed that they must erase any references and any personal data stored by them. The purpose of this is that—unless there is a legal or reasonable obstacle—the personal data “disappear” from accessible databases.

Erase does not have to be performed if data processing is necessary

- ✓ for exercising the right to freedom of expression or the right to information;
- ✓ for the establishment, exercise or defence of legal claims;
- ✓ due to compliance with a legal obligation;
- ✓ for archiving in the public interest, scientific or historical research, or statistical purposes, and erasure would render impossible or seriously impair the achievement of the objectives of the processing.

The Data Controller also erases personal data relating to the Data Subject included in its documentation if the purpose linked to the processing of the personal data has ceased. In the case of paper-based documentation, their destruction recorded by minutes must be ensured for the purpose of being able to prove such destruction later to the competent authority.

Rectification of data

The Data Subject may indicate that the processed data are inaccurate and may request what should be recorded instead. The Data Controller bears responsibility for the accuracy of data; therefore, it is necessary to periodically check their accuracy.

Right to restriction of processing:

The Data Subject may request the restriction of the processing of his or her personal data from the Data Controller, for example in an unclear, disputed legal situation. Where processing is restricted, such personal data—apart from storage—may be processed only with the Data Subject's consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for important public interest reasons of the European Union or a Member State.

Right to data portability:

The Data Subject may request that the data processed in relation to him or her be provided in a structured, commonly used, machine-readable format (e.g., .doc, .pdf, etc.), and is also entitled to transmit those data to another Data Controller without hindrance from the original Data Controller. This facilitates the Data Subject's situation by enabling him or her to move personal data from one Data Controller to another.

Right to object

The Data Subject is entitled, if he or she has not given consent to the processing of data, to object at any time to the processing of his or her personal data on specific grounds.

If the Data Subject wishes to exercise his or her rights, this entails his or her identification, and the Data Controller must necessarily communicate with the Data Subject; therefore, for the purpose of identification, personal data will need to be provided, and in the e-mail account the Data Subject's complaint related to data processing will be available within the period indicated in this notice in connection with complaints. Data processing-related complaints are answered without delay, but no later than within 30 days.

9. Remedies

The Data Subject is entitled to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) (1055 Budapest, Falk Miksa u. 9-11.; www.naih.hu, Telephone: +36 (1) 391-1400, Telefax: +36 (1) 391-1410, E-mail: ugyfelszolgalat@naih.hu) or to enforce his or her rights related to the processing of personal data before the Court having jurisdiction and competence under Act CXXX of 2016 on the Code of Civil Procedure.

10. Final provisions

- 10.1. If the Data Controller intends to carry out further processing of personal data for a purpose other than the purpose set out in this notice, it shall inform the Data Subject about the new purpose of processing prior to such further processing. Processing for the new purpose may commence only thereafter—and where the legal basis is consent—only if, in addition to being informed, the Data Subject also consents to the processing.
- 10.2. This data protection notice remains in force until withdrawn; its personal scope extends to all processors of the Data Controller, its employees, its officers and persons in a service relationship with it.
- 10.3. This notice must be reviewed annually and in the event of any change in EU or domestic legislation. Only the Data Controller is entitled to amend this notice.

This Data Protection Notice is effective as of 20 April 2026.

SmartFlow CRM Kft.
represented by: Maxim Várpalotai, Managing Director