

CloudMaster LTD



PRIVACY POLICY

VERSION 1.0

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Tartalomjegyzék

| | |
|--|----|
| Introduction..... | 2 |
| Scope of the Policy..... | 2 |
| Concepts | 2 |
| Name, data, and contact information of the data controller | 3 |
| Data processing by contracting parties..... | 4 |
| Scope and purpose of processed data:..... | 4 |
| Data management by contracting parties..... | 4 |
| Legal basis of data management..... | 5 |
| Deletion of personal data..... | 5 |
| Use of Data Processors | 5 |
| Management of User data | 5 |
| Scope and purpose of processed data | 5 |
| Legal basis for data processing | 6 |
| Data retention period..... | 6 |
| Deletion of personal data..... | 6 |
| General rules..... | 6 |
| Special data..... | 7 |
| Rights related to data processing..... | 7 |
| Modification of data protection information | 10 |

Introduction

The Service Provider, in the handling, recording, processing, and transmission of the personal data of the Customer, follows the:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation/GDPR)
- Act CXII of 2011 on informational self-determination and freedom of information
- Act XLVIII of 2008 on the basic conditions and certain limitations of commercial advertising activity
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services
- Act LXIII of 1992 on the protection of personal data and the disclosure of public data of public interest
- Act VI of 1998 on the protection of individuals with regard to the automated processing of personal data
- The provisions of the Convention on the Protection of Individuals with regard to Automatic Processing of Personal Data, Strasbourg, 28 January 1981
- The recommendations of the "Online Privacy Alliance," and other legal provisions related to data protection.

Scope of the Policy

The purpose of this privacy policy is to describe the handling of personal data of natural and legal persons and other organizations (hereinafter: Contracting Party) who are in a subscription relationship with Cloudmaster Ltd. (Address: 9/c Csók István Street, Dunaharaszti 2330, Tax number: HU27723797) (hereinafter: Service Provider), visitors to the Service Provider's website, users who register on the website, and users who use certain functions on the Service Provider's website (hereinafter: User) in accordance with applicable regulations on data protection.

Concepts

Personal data refers to any information related to an identified or identifiable natural person (data subject), including data that can be inferred from such information. Personal data retains this quality during its processing as long as the connection to the data subject can be restored, which requires the data controller to have the technical means necessary for restoration. The data subject can be considered identifiable, especially when he or she can be identified directly or indirectly by name, identifier, or one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

Special data refers to personal data concerning racial or ethnic origin, political opinions or affiliation, religious or philosophical beliefs, membership in trade unions, health status, and criminal personal data.

Consent is the voluntary and unequivocal expression of the data subject's will, based on appropriate information, whereby he or she consents to the processing of his or her personal data, either fully or for certain operations.

Objection refers to the data subject's statement objecting to the processing of his or her personal data and requesting the cessation of the data processing or the deletion of the processed data.

Data processing refers to any operation or set of operations performed on personal data, regardless of the applied procedure, including collection, recording, systematization, storage, use, transmission, publication, blocking, erasure, and destruction.

Data controller refers to the person or organization that determines the purpose of data processing, makes decisions concerning data processing (including the means used), and carries out such processing, or arranges it with an appointed data processor.

Data transmission refers to the provision of data to a specific third party.

Data processing refers to the performance of technical tasks related to data processing (independent of the method and tools used for processing, and the location of application).

Data processor refers to the person or organization that processes data on behalf of the data controller based on a contract concluded between them (including the conclusion of contracts required by law).

Data security refers to the protection of data against unauthorized access, modification, or destruction, and accidental loss or damage.

Disclosure: Making data accessible to anyone

Data destruction: Complete physical destruction of the data carrier containing the data

Data erasure: Making the data unrecognizable in a way that it cannot be restored anymore

Data blocking: Marking the data with an identification sign for the purpose of permanently or for a specified period of time restricting its further processing

Third party: A natural or legal person, or an organization without legal personality, who/which is not identical with the data subject, the data controller or the data processor.

Name, data, and contact information of the data controller

Name: Cloudmaster Ltd (Provider)

Address: 9/C Csók István street, Dunaharaszti H-2330

E-mail: info@clmaster.eu

Website: www.clmaster.eu

Data processing by contracting parties

Scope and purpose of processed data:

- Name of natural persons or legal entities and other entities that do not qualify as legal entities: necessary for primary identification of the customer and for issuing invoices
- Email address, phone number: necessary for communication
- Contact name, contact phone number, contact email address: used for communication if different from customer data
- Contact address (postal code, city, street name, house number): data to be provided during domain registration, necessary for domain registration
- Billing address (billing name, postal code, city, street name, house number): used for issuing invoices if different from customer data
- Mailing address (name, postal code, city, street name, house number): used for sending invoices and other paper-based correspondence if different from customer data
- Tax number / tax identification number / identity card number: necessary for domain registration, facilitating identification, used for domain registration
- User name: freely chosen identifier with which the customer can manage our services
- Password: the password associated with the user name, limits access to the interface, can only be logged in with the password.

Data management by contracting parties

Scope and purpose of processed data

- Name of natural person or legal entity and non-corporate organizations: necessary for the primary identification of the Client and for issuing invoices
- Email address, phone number: necessary for communication
- Contact name, contact phone number, contact email address: used for communication if different from the Client's data
- Contact address (postal code, city, street name, house number): data to be provided when registering a domain, necessary for domain registration
- Billing address (billing name, postal code, city, street name, house number): used for issuing invoices if different from the Client's data
- Mailing address (name, postal code, city, street name, house number): used for sending invoices and other paper-based items if different from the Client's data
- Tax number/tax identification number/personal identification number: necessary for domain registration, facilitating identification, used for domain registration
- Username: a freely chosen identifier with which the Client can manage our services
- Password: the password associated with the username, limiting access to the interface, only accessible by knowing the password

Legal basis of data management

The legal basis for data management is that it is necessary for the fulfillment of the contract, in which the data subject is one of the parties, and the voluntary consent of the data subject at the time of contract conclusion.

Identification of the Contracting Party, performance of the service activity between the Contracting Party and the Service Provider, provision of services undertaken based on the contract, certification of the obligations and rights related to the contract, enforcement of any claims arising from the contract, and assistance and information provision regarding the Service.

Duration of data management

The personal data provided by the Contracting Party during the conclusion of the contract may be managed until the termination of the contractual relationship between the Service Provider and the Contracting Party, or until the termination of the claim arising from the contract, or in the case of a legal dispute, until the conclusion of the relevant procedure(s), or until the expiration of the statutory limitation period, whichever is later.

In the case of domain registration, data management by the Service Provider begins from the time of submitting the domain request and lasts until the domain is released.

Data management carried out on the basis of legal obligations lasts for the period specified by the relevant legislation (e.g., in accordance with the provisions of the Accounting Act).

Deletion of personal data

The deletion request must be sent by email or by mail to the address of the Data Controller. At the voluntary decision of the Client, the Data Controller will delete the data within 30 days from the receipt of the request for locking or deletion, or communicate the factual and legal reasons for rejecting the request to the Client. The Service Provider will not delete the data of the Contracting Party as long as the data processing specified in the section on the duration of data processing continues.

Use of Data Processors

We use Data Processors to perform our contractual obligations and to comply with applicable laws. We provide them with personal data and expect adequate guarantees for the handling of personal data in the contracts we conclude with them. We maintain a list of Data Processors used.

Management of User data

Scope and purpose of processed data

During the use of the system, the following data is processed:

- On the server that serves websites and emails, the visitor's IP address, visit time, browser identifier, requested URL, and referring page (referrer) are recorded in a log file. After summarization, web statistics are created to help determine the number of visitors and for business development purposes.
- Additional web statistics are compiled regarding the visitors to the website through the Google Analytics and MyStat services, which display anonymized and aggregated data and are therefore not considered personal data. Purpose: Business development, understanding the visitor base. Details can be found on the relevant data processors' websites: www.google.com/analytics and www.mystat.hu.
- For customer service, feedback, and complaint handling purposes, the full name, email address, phone number, and mailing address may be recorded. In compliance with legal obligations, we retain this information for a maximum of 5 years.

Legal basis for data processing

The service provider does not analyze the log files generated during visits under normal circumstances. If any analysis is carried out, the data will not be linked to any other database, and no attempt will be made to identify the individual.

Data retention period

The system retains log files for 30 days before they are deleted.

Deletion of personal data

Requests for deletion should be sent by email or post to the Data Controller's address. Upon receipt of a request for deletion or blocking, the Data Controller will delete the data within 30 days or notify the customer of the factual and legal reasons for rejecting the request.

General rules

Data processing principles

Our data processing principles comply with Sections 1-4 of Article 4 of Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

The service provider will only process personal data for the purpose defined above, to the extent and duration necessary for achieving the purpose. The service provider will only process personal data that is essential for the purpose of data processing.

The Data Controller will not use personal data for any purpose other than the defined purpose. Personal data will only be transferred to third parties with the customer's prior informed consent. This does not apply to any mandatory data transfer required by law. The service provider will not disclose the customer's personal or identifiable data to third parties for direct marketing purposes.

Special data

The Service Provider does not process special data, especially personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, health or sexual life.

Rights related to data processing

Right to information

The data subject may request information from the Data Controller about the identity of the Data Controller, its contact details, the purpose of the planned processing of personal data, the legal basis for the data processing, the duration of the data processing, the data transferred in case of data transfer, and the recipients of the data, as well as the possibilities for lodging a complaint and for seeking remedies.

The Service Provider fulfils the data subject's request within a maximum of 30 days by sending a response to the contact information provided by the data subject.

Right of access

The data subject is entitled to receive feedback from the Data Controller on whether the processing of their personal data is in progress, and if so, they are entitled to receive information on the purpose of the data processing, the categories of personal data concerned, the recipients and the transferred data in case of data transfer, the duration of the data processing, the recipients of the data, the existence of guarantees under the GDPR in case of data transfer abroad, and the possibilities for lodging a complaint and for seeking remedies.

The Data Controller provides the data subject with a copy of the personal data being processed. The Data Controller may charge a reasonable fee based on administrative costs for any further copies requested by the data subject. If the data subject has submitted the request electronically, the information must be provided in a widely used electronic format unless the data subject requests otherwise.

The right to request a copy cannot adversely affect the rights and freedoms of others.

Right to rectification

The data subject is entitled to request the Data Controller to correct their inaccurate personal data without undue delay. Taking into account the purpose of the data processing, the data subject is entitled to request the completion of incomplete personal data, including by means of a supplementary statement. The data subject may exercise their right to rectification in practice through the data menu of the cPanel or ISPConfig web interfaces, by email, or in writing by post. The Service Provider fulfils the request within a maximum of 30 days and sends a notification.

Right to erasure (right to be forgotten)

The data subject has the right to request the Controller to erase their personal data without undue delay, and the Controller is obliged to erase the personal data concerning the data subject without undue delay, if one of the following reasons applies: - the personal data is no longer necessary for the purposes for which it was collected or otherwise processed; - the data subject withdraws

consent on which the processing is based, and there is no other legal ground for the processing; - the data subject objects to the processing and there are no overriding legitimate grounds for the processing; - the personal data have been unlawfully processed; - the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Where the Controller has made the personal data public and is obliged to erase the personal data, taking account of available technology and the cost of implementation, the Controller shall take reasonable steps, including technical measures, to inform other data controllers processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required.

The right to erasure shall not apply to the extent that processing is necessary: - for exercising the right of freedom of expression and information; - for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; - for the establishment, exercise or defense of legal claims.

The data subject may request the Controller to erase their personal data through the contact details provided by the Service Provider.

Right to restriction of processing

The data subject has the right to obtain from the Controller restriction of processing where the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

Restriction of processing may be requested where the Controller no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defense of legal claims.

Restriction of processing may be requested for the period during which it is established whether the legitimate grounds of the Controller override those of the data subject. The Controller shall inform the data subject in advance of the lifting of the restriction on processing.

Right to data portability

The data subject has the right to receive the personal data concerning them, which they have provided to a Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Right to object

The data subject shall have the right to object, on grounds relating to their particular situation, at any time to the processing of personal data concerning them which is carried out in the public interest or in the exercise of official authority vested in the controller, including profiling based on those provisions. In such cases, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the

interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

The service provider shall examine the objection within the shortest possible time, but no later than 15 days from the submission of the request, make a decision on the merits of the objection and inform the applicant in writing of its decision.

If the service provider determines that the objection of the subscriber is justified, it shall terminate the processing of personal data, including any further data collection or transmission, and shall lock the data, and notify all those to whom the personal data affected by the objection had previously been transmitted, and who are obliged to take measures to enforce the right of objection. If the data subject does not agree with the decision of the service provider or if the service provider misses the above deadline, the data subject may, within 30 days of the communication of the decision or the last day of the deadline, appeal to the court.

Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless the decision is necessary for entering into, or performance of, a contract between the data subject and a data controller, is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or is based on the data subject's explicit consent.

Court enforcement options regarding data processing

In case of infringement of their rights, the data subject may bring a legal action against the data controller. The court shall handle the case as a matter of urgency.

The data controller is obliged to prove compliance with the data processing regulations.

The adjudication of the lawsuit falls under the jurisdiction of the court. The lawsuit may also be initiated before the court of the data subject's domicile or residence, as chosen by the data subject.

Initiation of proceedings by the National Authority for Data Protection and Freedom of Information

The data subject is entitled to file a complaint with the supervisory authority if they believe that the processing of their personal data is unlawful or violates their rights, or if there is an immediate danger thereof. The contact details of the National Authority for Data Protection and Freedom of Information are as follows: Headquarters: 22/c Szilágyi Erzsébet Avenue, Budapest 1125 Email: ugyfelszolgalat@naih.hu Phone: +36 (1) 391-1400

Before turning to the supervisory authority or the court with a complaint, please contact our company for consultation and to find a prompt solution to the problem.

Modification of data protection information

Our company reserves the right to modify this Data Protection Information at any time, and will inform the data subjects accordingly. The disclosure of information regarding data processing is carried out on the website www.clmaster.eu.