

Privacy Policy **- Plantoon Technologies Kft. –**

The purpose of this Privacy policy (hereinafter: **Policy**) is to collect in line with the applicable laws all data processing principles, objectives and other circumstances that determine for what purpose, how long and how Plantoon Technologies Kft. as data controller (hereinafter: **Data controller**) processes personal data provided by you and what kind of legal remedies you have concerning the data processing.

The security and compliant processing of the personal data provided by you is extremely important for us, therefore please read through this Policy carefully with attention. Should you have any questions or remarks concerning this Policy, then please contact us before accepting the Policy or any time after it and our colleagues will assist you or alternatively you can contact us via the email address indicated below.

I. Definitions used in this Policy

You can find below the most important terms used in this Policy.

1. **Personal data:** Any information pertaining to the Data subject based on which the Data subject is or can be identified. A natural person is identifiable directly or indirectly, especially through some identifier, such as name, number, location data, online identifier or one or more factors pertaining to the bodily, physiological, genetic, mental, economic, cultural or social identity. Data controller collects the personal data from the Data subjects that are indicated for each data processing purpose.
2. **Data subject:** all identified or identifiable natural person whose personal data as detailed in this Policy are processed by the Data Controller.
3. **Data processing:** irrespective of the means applied, any operation or set of operation performed on the personal data, especially collecting, registering, organizing, storage, modification, use, query, forwarding, publication, aligning or interconnection of same, erasure, destruction, furthermore the hindering of further use of the data.
4. **Data controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Plantoon Technologies Korlátolt Felelősségű Társaság processes the personal data of the Data subject, i.e. only this company is allowed to render decisions and implement same concerning the personal data of the Data subjects.
5. **Data processing activities:** any operation on the personal data concerning the data processing that is carried out on behalf of Data controller, irrespective of the means and tools or location of the implementation provided that the operations are performed on personal data. Accordingly, data processor is the natural or legal person, public body, agency or any other authority that processes personal data on behalf of the data controller.
6. **Recipient:** natural or legal person, public body, agency or any other authority to whom the personal data is forwarded, irrespective whether it counts as a third person.

7. **Supervisory authority:** the National Data Protection and Freedom of Information Authority (address: 1055 Budapest, Falk Miksa utca 9-11.; e-mail: ugyfelszolgalat@naih.hu; website: <http://naih.hu>; phone: +36 (1) 391-1400; mailing address: 1363 Budapest, Pf. 9.).
8. **Website:** <https://plantoontechnologies.com/>/<https://vespuccipartners.com/> website operated by the Data controller.
9. **GDPR:** Regulation no. 2016/679 of the European Parliament and of the Council 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).
10. **Szt.:** Act no. C of 2000 on accountancy.

II. The Data controller, its representative and contact information

The contact details of Data controller and its representative are indicated in this Section.

Data controller:

- a) Company name: Planton Technologies Kft.
- b) Seat and mailing address: 2462 Martonvásár Hunyadi út 1/A.
- c) Company reg. no: 07-09-32162
- d) Tax no: 26669108-2-07
- e) E-mail: planton.kft@gmail.com; gabor.antal@sequana.tech

Name and contact information of the representative of Data controller:

- Name: Antal Gábor
- E-mail address: gabor.antal@sequana.tech

III. Principles of data processing

Here you can find a summary of data processing principles that Data controller applies throughout the period of data processing with full compliance in line with Article 5 of GDPR.

1. **Lawfulness, fairness and transparency:** The personal data of Data subject is processed only in lawful and fair ways, transparent for the Data subject. Data controller publishes and makes accessible the up-to-date text of this Policy free of charge, without any obligations and continuously. Data controller does not process the personal data in any unfair way or for other objectives than detailed in this Policy and acts at all times in line with this Policy and with the applicable laws.
2. **Purpose limitation:** Data controller processes the personal data only for clear and lawful purposes as detailed in this Policy. For the transparency of the respective data processing purposes Data controller provides information in this Policy about the purpose, duration and legal grounds of the processing of each category of personal data. These stipulations are considered by Data controller as binding.
3. **Storage limitation:** Data controller stores the personal data of Data subject in such way that data subjects can be identified only for the time necessary until the purpose of the data processing is completed. The deletion deadlines of the respective personal data for each purpose are detailed in this Policy.

4. **Data minimization:** The goal of Data controller is to process only the most relevant personal data necessary for its high-quality services. The scope of information is actually necessary for the data processing purposes.
5. **Accuracy:** The goal of Data controller is to ensure that the stored personal data are continuously up-to-date and accurate and for this purpose Data controller takes all reasonable steps. Data subjects can help ensuring the up-to-date nature of the personal data by reporting any changes or rectifying the already provided personal data.
6. **Principle of data protection / data integrity:** Data controller considers the protection of provided personal data as a top priority, therefore takes all necessary, reasonable and technically feasible steps and technical and other organizational measures and processes. Data controller stores the personal data primarily digitally, while the personal data recorded on hard copies are also stored in hard copies. For data security purposes and for the prevention and remedying of data breaches Data controller:
 - prevents unauthorized access, data records, data changes and deletion concerning the personal data with passwords and encryption processes;
 - personal data stored in hard copies are stored in properly secured closed rooms;
 - only properly licensed and continuously monitored software are used in the internal computer system;
 - ensures that the digitally processed personal data are accessible only in a digital system requiring access credentials;
 - ensures the anti-virus protection of the digital systems;
 - performs back-up savings to prevent the loss of digitally processed documents
7. **Accountability:** Data controller is responsible for the compliance with the above principles and is able to verify the compliance.

IV. Purpose and processes of Data processing

Herein you can find a summary of the data processing activities, legal grounds and processing periods to inform the Data subject concerning the data processing purposes.

1. CV-database:

The Data Controller posts from time to time job advertisements for the open positions at the company to which applicant may send their curriculum vitae. The legal basis of the data process of the curriculum vitae and the personal data therein is the determinate and volunteer consent of the Data subject which is given by sending its curriculum vitae [Item a) Article 6(1) GDPR]. The purpose of the data processing is the conduction of the job application, selection of the applicants, filling the vacant position.

Scope of personal data: name, address, phone no, e-mail address, the content of the curriculum vitae (that is determined by the Data subject).

Data processing duration: the curriculum vitae of those persons who are not admitted shall be deleted after the closing of the job application.

2. Data processing concerning the fulfilment of agreements:

Data processing purpose: contracting and performance.

Legal ground of data processing: fulfilment of a contract. [Item b) Article 6(1) GDPR]

Scope of personal data: if the contracting party is a legal person, then the name, position, signature of the person representing the company; if the contracting party is a natural person (private entrepreneur) then name, registry number, address, tax number and signature.

Data subject: contracting party.

Data processing duration: the limitation period as described in the Hungarian Civil Code (Ptk.) at least (~ 5 years), for invoices it is 8 years in line with § 169(2) Szt. (Laws may prescribe longer retention period based on the type of contract.)

In case of investment in the company, the following provisions may also be governing:

- Gov. decree no. 272/2014. (XI. 5.) about the order of use of the subventions originated from the certain European Union funds during the 2014-2020 programing period
„110/A. § The beneficiary shall maintain a separate accountancy record on project level, the treasury shall maintain it on program level, they shall register all documents separately related to the project and keep them until at least 31.12.2027.”
- Gov. decree no. 255/2014. (X. 10.) about the rules of the state (national) subventions in the context of European Union competition law related to the use of the resources for the 2014-2020 programing period
„18. § The beneficiary shall keep the deed and related to the subvention for 10 years from the day of the decision about the subvention.”

3. **Processing of the personal data of contact persons determined in agreements:**

Data processing purpose: keeping contact for the fulfilment of the contract.

Legal ground of data processing: Legitimate interest of Data controller [Item f) Article 6(1) GDPR]

Scope of personal data: name, email, phone number, position.

Data subject: contact person of the contracting party.

Data processing duration: the rules pertaining to the agreement are applicable, taking into consideration that the contact information constitute a part of the agreement and cannot be separately handled.

4. **Data processing concerning invoices:**

Data processing purpose: issuing invoices, ensuring the background of the payment, performing statutory obligations.

Legal ground of data processing: performing a legal obligation [Item c) Article 6(1) GDPR] – pursuant to Szt. and Áfa tv. (VAT Act).

Scope of personal data: name, address, tax number, bank account number for natural person contracting party; if a contact person is indicated: name.

Data subject: contracting party; possibly a contact person.

Data processing duration: 8 years in line with § 169(2) Szt. for invoices.

5. **Contacting, request for information:**

Data controller enables anyone to request information through the published contact data and on its website (<https://sequana.tech>; <https://poliloop.com> - „Contact us!”) concerning the activities and services of Data controller and to contact to the Data controller.

Legal ground of data processing: consent of the data subject [Item a) Article 6(1) GDPR]. The data processing takes place at the request of Data subject.

Data processing purpose: reply to the Data subject.

Scope of personal data: on <https://sequana.tech>; <https://poliloop.com> : name, email, message, on poliloop.com: company name, name, e-mail, phone no, message.

Data processing duration: until the consent is revoked by the data subject, up to year at the most from the last contacting.

6. Personal data process related to visiting social sites:

The Data Controller maintains Facebook and LinkedIn pages on which it publishes the news, information related to its activity.

Scope of personal data: name, comment, evaluation.

Data subject: persons having Facebook/ LinkedIn profile who like, follow the pages, make comments.

Data processing purpose: Giving information for the interested persons on the Data controller's Facebook/ LinkedIn page, representing and popularization of the Data Controller's activity.

Legal ground of data processing: consent of the data subject [Item a) Article 6(1) GDPR].

Data processing duration: until the realization of the purpose, but until the deletion based on the Data subject's request at the latest.

Facebook page of the Data controller: <https://www.facebook.com/poliloopinc>.

LinkedIn page of the Data controller: <https://www.linkedin.com/company/poliloop>

The Privacy Policy of Facebook is available under the following link: <https://www.facebook.com/policy.php>

The Privacy Policy of LinkedIn is available under the following link: https://www.linkedin.com/legal/privacy-policy?trk=lithograph_footer-privacy-policy

7. Cookies

The cookie is an information package that the server sends to the browser, then the browser resends to the server it at all time when a request is directed to the server. The cookies are created by the web server by means of the browser on the machine of the user where they shall be stored in a separated library. The cookie is a small text file that is stored on your computer when you visit the website.

The website of <https://plantoontechnologies.com/> and <https://poliloop.com/> apply cookies to track and analyze the traffic of the website (e.g. how many visitors visited the page) and to optimize the use of the website (e.g. how fast the page loads).

The websites use Google Analytics which helps to track how and when the visitors visit the page. (Further information:

<https://analytics.google.com/analytics/web/provision/#/provision>;

<https://policies.google.com/privacy?hl=hu>)

InSight Score: measures the online efficiency of the page. [The basis of the calculation is – among others – how often the page is visited, how many visit results in making contact (e.g. purchase, booking), on the related social media platform show active the clients are, etc.]

Sources:

www.google-analytics.com

www.gstatic.com

www.googletagmanager.com

The Data Controller informs the visitors about it in pop-up window and ensures possibility to decide about cookies.

You can manage your cookie settings (permission/ prohibition) in your browser settings at any time.

- Internet Explorer: <https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Microsoft Edge: <https://support.microsoft.com/en-us/search?query=enable%20cookies%20in%20edge>
- Firefox: <https://support.mozilla.org/en-US/products/firefox/protect-your-privacy/cookies>
- Google Chrome: <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>
- Safari: <https://support.apple.com/en-ie/guide/safari/sfri11471/mac>

V. Recipients (data processors, data forwarding)

1. Data forwarding:

The Data Controller forwards personal data to its contributors who act for the Data Controller, especially to provide legal, accounting, audit services.

Bookkeeping service provider is MandoFinance Adótanácsadó, Pénzügyi és Számviteli Szolgáltató Korlátolt Felelősségű Társaság (1134 Budapest, Váci út 45. G. ép. 3. em.; 01-09-306764).

If an investor intends to enter into the Company, then the Company makes possible for it to get to know the contracts concluded by the Company.

2. Data processing:

The Data Controller applies Google G-Suite and Microsoft SharePoint for data storing. (Google data protection: <https://policies.google.com/privacy?hl=en-US>; Microsoft data protection: <https://www.microsoft.com/hu-hu/trust-center/privacy?rtc=1>)

VI. Exercising of rights and remedies

You can find below a summary of data subject rights that can be exercised in relation to the Data controller.

- 1. Communication with the Data controller:** Data subject and Data controller communicate in email or postal mail. Data subject is entitled to receive confirmation from Data controller whether his/her personal data is processed by the Data controller and if the answer is positive, then Data subject has a right of access to the personal data as follows.

The information provided by the Data controller as a consequence of the exercising of the right of access shall include the following:

- a) data processing purposes;
- b) processed personal data;
- c) recipients of data forwarding;
- d) foreseeable period of the data processing or if it is not possible to determine same, then the criteria for determining such period;
- e) rights of the Data subject;
- f) right to file a complaint with the Supervisory authority;
- g) source and legal ground of the data collecting by Data controller.

Data controller shall provide the information without any undue delay but within one months from the receipt of the enquiry at the latest. If necessary, with a view to the complexity and

number of queries, this deadline can be extended with an additional two months. Data controller immediately informs the Data subject about the extension of the deadline, including the reasons for the extension, still within one month from the receipt of the enquiry. Data controller makes a copy of the processed personal data available to the Data subject at his/her request. Data controller is entitled to charge reasonable administrative fee for further copies requested by the Data subject.

2. **Rectification:** Data subject is entitled to inform the Data controller of any changes in his/her personal data (via email or postal mail, as detailed above). Data controller registers the changes within 8 days from the receipt of information. If the changes to the personal data of the Data subject are not reported immediately, then the Data subject shall bear the consequences thereof. If the provided personal data is false and the correct personal data is available to Data controller, then Data controller rectifies the data automatically.
3. **Data erasure:** Data subject is entitled to request that the Data controller should erase personal data pertaining to the Data subject without undue delay and Data controller is obliged to delete such data without undue delay especially if one of the following circumstances is given:
 - a) the personal data are not necessary anymore for the purpose that they were collected or otherwise processed for;
 - b) the Data subject withdraws the consent given to the data processing and the data processing does not have any other legal ground (the withdrawal does not concern the legality of the data processing retrospectively);
 - c) Data controller processed the personal data unlawfully;
 - d) the personal data have to be erased due to a legal obligation prescribed in an EU or member state law to which data controller is a subject.

Data controller is not obliged to delete the personal data even if any of the above circumstances are given if the data processing is necessary for the following:

- a) for exercising the right of freedom of expression and information;
 - b) 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;
 - c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
 - d) for the establishment, exercise or defense of legal claims.
4. **Right to restriction of data processing:** Data subject is entitled to request the Data controller to restrict the data processing if one of the below conditions is met.
 - a) the accuracy of the personal data is contested by the Data subject; in this case the restriction is for a period enabling the Data controller to verify the accuracy of the personal data;
 - b) the data processing is unlawful and the Data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the Data controller no longer needs the personal data for the purposes of the data processing, but they are required by the Data subject for the establishment, exercise or defence of legal claims;
 - d) the Data subject has objected to processing and in this case the restriction is for the period that is necessary for the verification whether the legitimate grounds of the Data controller override those of the Data subject.

If the data processing is subject to a restriction as described above, then the concerned personal data, with the exception of storage, may be processed only with the consent of Data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of other natural or legal persons or for important public interests. If the restriction of the processing is lifted, then Data controller informs the Data subject requesting the restriction in advance about the developments.

5. **Right to data portability:** For personal data processed on the basis of the consent of the Data subject or on the basis of the performance of a contract, the Data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Data 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 Data controller to which the personal data have been provided. This right can be exercised only in the case of data processed on the basis of consent or performance of contract if the data are processed digitally.
6. **Initiating proceedings of the Supervisory authority:** Data subjects are entitled to file complaints with the Supervisory authority or to initiate scrutiny with reference to an infringement of data protection rights concerning the processing of their personal data or there is an imminent risk thereof. The Supervisory authority acts free of charge, the expenses are advanced and covered by the Supervisory authority. No one shall suffer any retaliation for any reports made to the Supervisory authority. The Supervisory authority can disclose the identity of the applicant only if this is required for a successful proceeding. If the applicant requests so, the Supervisory authority is not allowed to disclose the identity even if this leads to the frustration of the proceedings.
7. **Exercising of rights at court:** if the rights of the Data subject were breached, then the Data subject can choose the judicial route against the Data controller. Regional courts are competent in such lawsuits. As a main rule the regional court with geographical jurisdiction based on the seat of the Data controller has competence but the Data subject can opt for the regional court at the home address or temporary address of the Data subject. The geographical competence of the regional courts can be checked in the locator application available at the “Court search” menu item on the www.birosag.hu website. The Regional Court of Budapest-Capital has geographical jurisdiction based on the seat of Data controller. Regional courts handle these lawsuits with urgency.
8. **Damages and Compensation for the breach of personality rights:** If Data controller, by unlawfully processing personal data of the Data subject or by breaching data security requirements:
 - causes damages to the Data subject or to others, then the damages shall be compensated (compensation of damages);
 - breaches the personality rights of the Data subject, then the Data subject may request the payment of compensation from Data controller.

Data controller is not responsible for the compensation of damages or of the breach of personality rights, if Data controller can prove that the damages or the breach of personality rights of the Data subject were caused by an unavertable event outside of the scope of the data processing. No damages are payable and no compensation for the breach of personality rights can be claimed if the consequences occurred due to the wilful or grossly negligent actions of the Data subject (injured party).

VII. Data security

Data controller arranges data security and for this purpose takes the necessary and adequate technical and organizational measures, ensures the confidentiality of personal data (e.g. unauthorized publication or access), integrity (modification, amendment, deletion), availability (accessibility, restorability).

The above requirements are fulfilled as follows, among others:

- arranging that no authorized person can access the devices used for data processing purposes (both regarding hardware and software);
- electronically stored data are stored in a closed, password-protected system;
- takes care of the confidentiality of the data: the colleagues are obliged to use personal data only for the legitimate data processing purposes and only to the extent necessary in such way to prevent that anyone without a need-to-know should not be able to access the data;
- forwards personal data only when a legitimate legal ground is given;
- provides anti-virus protection;
- regular supervising of the IT compliance level and further development, if necessary.

VIII. Miscellaneous provisions

Data controller maintains the right to amend this Policy unilaterally at any time.

This Policy is subject to Hungarian laws.

Budapest, 06.01.2021