

Aggreg8 Ltd. - Privacy Policy

Updated: 2024. June 10.

In this Privacy Policy Aggreg8 Ltd. (Cg. 06-09-023518; registered office: 6725 Szeged, Szent Ferenc utca 1., hereinafter referred to as the "Service Provider") also referred to as ("we", "us" or "our"), the developer and operator of the account information service (hereinafter referred to as the "Services") operating under the domain names aggreg8.io or aggreg8.hu (the "Site") informs its users of the Site (referred to as "User" or "Users"), also referred to as ("You" or "Your") about the processing of User's personal data regarding the Services, in accordance with the Regulation 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter referred to as the "GDPR").

The Service Provider may unilaterally amend or modify this Privacy Policy at any time. This Privacy Policy shall enter into force upon its publication.

1. What is our legal basis for collecting and processing your personal data?

The legal basis for processing personal data are:

- a. the User consent to the processing of his/her personal data for specific purposes in accordance with Article 6(1)(a) of the GDPR (hereinafter: "Consent").
- b. the processing is necessary for the performance of a contract to which the User, as data subject, is a party (hereinafter: "performance of a contract"), pursuant to Article 6(1)(b) of the GDPR.
- c. the processing is necessary for compliance with a legal obligation to which the controller is a subject such as the fulfilment of an accounting or book-keeping obligation; (hereinafter: "compliance with a legal obligation"), pursuant to Article 6(1)(c) of the GDPR.
- d. the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (hereinafter: "Legitimate Interest") pursuant to Article 6(1)(f) of the GDPR.

2. What type of personal data we collect from you?

The categories of personal data collected from you and the purposes for which they are processed are set out in the tables below, hereinafter: "Personal Data".

2.1. Personal Data collected upon registration to the Service

Subject	Category	Personal Data source	Personal Data type	Personal Data handling purposes	Duration of personal data handling
User registered to the Service	Account Registration Data	From the User	Email address	Contract creation, contract performance Claims and law enforcement, fraud prevention and management User Identification Ensuring communication	30 days from the date of deletion of the Site account and registration by the User.

2.2. Personal Data collected in connection with general use of the Service

Subject	Category	Personal Data source	Personal Data type	Personal Data handling purposes	Duration of Personal Data handling
User registered to the Service	Related to the use of the Service	From the User	Name of the User's Bank	Performance of the contract	30 days from the date of deletion of the Site account and registration by the User.

User registered to the Service	Related to the use of the Service	From the User	User's online Banking login ID	Performance of the contract	30 days from the date of deletion of the Site account and registration by the User.
User registered to the Service	Related to the use of the Service	From the User/ From the User's Bank	User's account number(s)	Performance of the contract	30 days from the date of deletion of the Site account and registration by the User.
User registered to the Service	Related to the use of the Service	From the User's Bank	User's bank account information (based on individual settings, but typically at least 90 days of transaction data)	Performance of the contract	30 days from the date of deletion of the Site account and registration by the User.

2.3. Personal data collected in connection with the information sharing service with fourth party business partners

Subject	Category	Data source	Data type	Data handling purposes	Duration of data handling
User registered to the Service	Related to the use of the Service	From the Service Provider	Name of the fourth party business partner	Performance of the contract	30 days from the date of deletion of the Site account and registration by the User.
User registered to the Service	Related to the use of the Service	From the Service Provider	Details of information sharing with the fourth party business partner (duration, purpose, etc.)	Performance of the contract	30 days from the date of deletion of the Site account and registration by the User.

The processing of personal data related to the information sharing service is necessary for the performance of the contract (i.e., to share the personal data obtained by synchronizing the User's Bank account data with a fourth party business partner on the basis of the User's explicit authorization.)

2.4. Personal data collected in connection with customer service

Subject	Category	Data source	Data type	Data handling purposes	Duration of personal data handling
User registered to the Service, contacting the Customer Service	Customer complaint	From the User	Name	User Identification Communication with the User during complaint handling Contract performance Settling a complaint Claims and law enforcement	Within the general statute of limitations, i.e., 5 years from the date of the complaint.
User registered to the Service, contacting the Customer Service	Customer complaint	From the User	Email address	User identification	Within the general statute of limitations, i.e., 5 years from the date of the complaint.

				Communication with the User during complaint handling Contract performance Settling a complaint Claims and law enforcement	
User registered to the Service, contacting the Customer Service	Customer complaint	From the User	Phone number	Communication with the User during complaint handling Settling a complaint Claims and law enforcement	Within the general statute of limitations, i.e., 5 years from the date of the complaint.
User registered to the Service, contacting the Customer Service	Customer complaint	From the User	Subject of the complaint	Settling a complaint Claims and law enforcement	Within the general statute of limitations, i.e., 5 years from the date of the complaint.
User registered to the Service, contacting the Customer Service	Customer complaint	From the User	Details of the complaint	Settling a complaint Claims and law enforcement	Within the general statute of limitations, i.e., 5 years from the date of the complaint.

The basis for personal data processing in connection with customer service is the Legitimate Interest, pursuant to Article 6(1)(f) of the GDPR: data processing in the context of the investigation, handling and processing of complaints and grievances is in the mutual interest of the User and the Service Provider.

2.5. System message by email

The Service Provider will send system messages to Users who have registered with the Service from time to time. Any message related to the operation of the Service, possible outages, maintenance, the functions of the Service, new functions, changes to existing and new functions, the scope of available services and how to use them, the Terms and Conditions, the Privacy Policy or any amendments thereto, the rights and obligations of Users in relation to the Service, the services used are referred to as “System Message”.

For the purposes of sending the System Message, the Service Provider shall carry out the following processing:

Subject	Category	Data source	Data type	Data handling purposes	Duration of data handling
User registered to the Service	Related to the use of the Service	From the User	Email address	Sending a System Message for the performance of the contract	30 days from the date of termination of the contract

3. Who processes your personal data and who has access to it?

a. Data Controller:

The data controller of your personal data is the Service Provider, i.e. Aggreg8 Ltd., whose contact details and company data are as follows: Aggreg8 Ltd., Cg. 06-09-023518; registered office: 6725 Szeged, Szent Ferenc utca 1.

Your personal data will be accessed by the Service Provider's employees to the extent strictly necessary for the performance of their work. Access to your personal data is governed by strict internal rules.

b. Data Processors:

For the processing and storage of your personal data, we use various companies with whom we have concluded a data processing contract and to whom we transfer your data for the purposes described below.

The following data processors process your data:

Name and Address of Data processor	Purpose of data processing
1. Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18 P521)	Microsoft Azure cloud service provider
2. Atlassian Pty Ltd (Level 6, 341 George St, Sydney NSW 2000, Australia)	Handling customer complaints, customer comments
3. FintechX Technologies Zrt (6725 Szeged Szent Ferenc utca 1. Magyarország)	Handling customer complaints, customer comments
4. Comnica Kft. (Budapest, Mohai út 38, 1119)	Software for telephone customer service
5. GOOGLE LLC (USA - Google Data Protection Office, 1600 Amphitheatre Pkwy Mountain View, California 94043)	Profiling, advertising, analytics and measurement services, behavioral advertising display

Information on data transfers abroad:

While Google LLC and its member companies are transferring personal data outside of EU, they rely on Standard contractual clauses (SCCs) for personal data transfers where required.

** SCCs have been approved by the European Commission and can't be modified by the parties using them.*

4. Who is Service Provider's Data Protection Officer and how can you contact them?

Fónyad Zsuzsanna

Contacts:

- a) E-mail address: dpo@aggreg8.io
- b) Postal address: 6725 Szeged, Szent Ferenc utca 1.

5. To whom do we transfer your personal data?

We do not currently transfer your personal data to recipients other than the above Data Processors.

In accordance with the General Data Protection Regulation, you have certain legal rights to your personal data.

Privacy Rights

6. What rights do you have in relation to the processing of your personal data and how we ensure that you can exercise them?
 - a. **Right of access:** At any time, you have the right to request information about what data we process, the purpose of the processing, for how long, to whom we disclose it, and where the data we process comes from.
 - b. **Right to rectification:** At any time, you have the right to rectify or clarify if your data changes or is incorrectly recorded, you can ask us to correct it.
 - c. **Right to erasure:** In the cases specified by law, you can ask us to erase your personal data we process.
 - d. **Right to restriction of processing:** In the cases specified by law, you have the right to request the restriction of the processing of your personal data.
 - e. **Right to data portability:** At any time, you have the right to request the transmission of your personal data by filling in the data portability request form attached to this notice, exercising your right to request that we disclose to you the types of data specified by law or, upon your specific request and authorization, to transmit them directly to another service provider designated by you.

If you make one of the above requests, we will act in accordance with the law and inform you within one month regarding the action we have taken on your request.

f. **Right to withdraw consent:** Where we process your data on the basis of your consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of our processing prior to the withdrawal of your consent.

g. **Right to complain:** Should you be dissatisfied with the service we provide in relation to our processing, you have the right to file a formal complaint with the relevant supervisory authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Website: <http://naih.hu>

Postal address: 1530 Budapest, Pf.: 5.

E-mail: ugyfelszolgalat@naih.hu

Phone number: +36 (1) 391-1400

In addition to the above, you can also bring an action against the Service Provider before the Szeged Court of Justice in case of personal data protection violation.

h. **Right to object:** where we process your Personal Data on the basis of legitimate interests as set out above, you may at any time object separately to this processing.

i. If you object, we will no longer process your Personal data.

Confidentiality

7. How we keep your Personal data safe?

We handle your personal data confidentially. We have a detailed information security policy to ensure the security of your personal data and information we handle. All our employees are subject to strict confidentiality requirements when processing personal data.

The Service Provider shall take all precautions with regard to the database and the data stored on its server to store information about the User in a secure environment. Only the Service Provider has access to the registered data.

Breach of Personal Data

8. What we do in the event of a personal data breach?

In accordance with the law, we notify the supervisory authority of a breach of data protection incident within 72 hours of becoming aware of it and we keep records of data protection incidents. And in cases specified by law, we also inform the concerned Users.

Changes to the Privacy Policy

9. When and how we amend this privacy notice?

We reserve the right to change this privacy policy at any time to reflect changes in our privacy practices.

If the scope of the personal data processed or other circumstances of data processing change, this Privacy Notice will be amended and published on the Site within 30 days in accordance with the GDPR. In any case, please read the amendments to this privacy notice carefully as they contain important information about the processing of your personal data.

REQUEST FOR DATA PORTABILITY

Undersigned

Name:

Email address:

I hereby inform Aggreg8 Ltd. that I wish to exercise my right to data portability pursuant to Article 20 of EU Regulation 2016/679 on the General Data Protection Regulation.

In exercising the above right, I request Aggreg8 Ltd. to kindly provide me with the personal data relating to me that Aggreg8 Ltd. processes in an automated way on the basis of my consent or in order to establish or perform my contract with Aggreg8 Ltd.

In exercising the above right, I request Aggreg8 Ltd. to kindly transfer the personal data relating to me that Aggreg8 Ltd. processes by automated means on the basis of my consent or in order to establish or perform my contract with Aggreg8 Ltd., on the basis of the explicit authorisation and power of attorney given by me by signing and submitting this request to Aggreg8 Ltd., directly to the following other data controller, if technically feasible:

Name of the service provider: _____

Data transfer format requested by the service provider: _____

By submitting this request, I acknowledge that the direct transfer of my personal data to another controller is only possible if the personal data transferred to the other controller is carried out via an appropriate secure communication and if the receiving controller's system is technically capable of receiving the data sent, for which Aggreg8 Ltd. is not responsible and has no control over.

Date: _____