# **Privacy Notice**

Agency Partners Kft. (company registration number: 01-09-389968, registered seat: Hungary, 1124 Budapest, Martonhegyi street 67. 2nd floor 1.) (hereinafter referred to as "Agency Partners", "Us", "Our") takes privacy seriously. We design and operate our services with the protection of your privacy in mind. Please read the following to learn more about our Privacy Notice.

## INTRODUCTION

Welcome and thank you for visiting the Agency Partners website ("Website").

Agency Partners offers a platform to Clients that have contracted with Agency Partners Kft. for software development engagements ("Clients"). Clients include our partners or resellers that offer our Services in connection or combination with services they provide to their customers, most often through their websites, webshops or social media pages.

In this Privacy Notice, we refer to the Agency Partners platform and applications as our "Services".

This Privacy Notice provides information to Clients and business partners, and other third parties concerning the processing of their data.

The applicable regulations are 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) and the UK GDPR which means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018.

#### 1. DATA CONTROLLER

Name and contact details of the controller:

#### Agency Partners Kft.

company registration number: 01-09-389968

registered seat: Hungary, 1124 Budapest, Martonhegyi street 67. 2nd floor 1.

email: hello@agency-partners.com

#### **Data Protection Officer (DPO)**

Bence Gedai, hello@agency-partners.com

### 2. DATA PROCESSING

Below, you can find the information on

- the purpose of processing;
- the data processed;

- the legal basis of processing;
- the period of processing;
- persons and entities with access to the data;

## 2.1. Using cookies

Purpose	Data processed	Legal basis	Persons/entities having access to the data	Period
Making the Website more customizable to better accommodate the visitor's interests and needs by making it easier to use. Cookies are also designed to facilitate the user's future activities and to improve the user experience. Cookies can also be used to create anonymous, aggregated statistics that help us understand how people use our Website, which allows us to optimize our Website content and structure. No natural person can be identified from this information.  Necessary cookies are essential for the proper functioning of the Website	Please see the details in our Cookie Policy.	In case of necessary cookies, the legal basis is Agency Partners' s legitimate interest.  In the case of other cookies, the legal basis is consent.	Please see the details in our Cookie Policy.	Please see the details in our Cookie Policy.

|--|

# 2.2. Contacting us

Purpose	Data processed	Legal basis	Persons/entities having access to the data	Period
Handling, responding the messages, questions received via the contact form at (https://agency-par tners.com/)  Handling, responding to messages, questions received via emails.	Name, email	Consent	Agency Partners's employees dealing with inquiries	1 year after responding the inquiry/reques t

# 2.4. Download whitepaper

Purpose	Data processed	Legal basis	Persons/entities having access to the data	Period
Based on your consent, Agency Partners will process your personal data in order to provide you with the whitepaper.	First name, company email, LinkedIn profile url	Consent	Agency Partners's employees dealing with operations  Please see more details in Section below	1 year after sending the document

#### 2.5. Required by law

Agency Partners may process personal data to meet applicable law, regulation, legal process or lawful government requests of any country of which Agency Partners will inform you immediately, unless it is required otherwise by the law.

### 3. TECHNICAL AND ORGANISATIONAL MEASURE

Within the framework of its services, Agency Partners attributes the very highest importance to the security and integrity of its customers' personal data.

Agency Partners undertakes to take all pertinent precautions in order to preserve the security of the data and, in particular, to protect them against any accidental or unlawful destruction, accidental loss, corruption, unauthorised circulation or access, as well as against any other form of unlawful processing or disclosure to unauthorised persons. To this end, Agency Partners implements industry-standard security measures to protect personal data from unauthorised disclosure.

In order to avoid in particular all unauthorised access, as well as to guarantee accuracy and the proper use of the data, Agency Partners has put the appropriate electronic, physical and managerial procedures in place with a view of safeguarding and preserving the data gathered through its services.

## 4. DATA SUBJECT RIGHTS

One of the key objectives of the European General Data Protection Regulation (GDPR) was to ensure the privacy and protection of the personal data of data subjects.

To help data subjects in being assured of the protection and privacy of their personal data, GDPR empowers data subjects with certain rights. Through these rights, data subjects can make a specific request and be assured that personal data is not being misused for anything other than the legitimate purpose for which it was originally provided.

## 4.1. Right to information

The right to information allows data subjects to know what personal data is collected about them, why, who is collecting data, how long it will be kept, how they can file a complaint, and with whom their data will be shared.

Agency Partners is obligated to provide information about:

- · controller's information and contact details
- purpose of data processing
- legal basis for personal data processing
- third party details
- data retention period,
- rights granted to the data subject under the data protection law,
- the right to file a complaint,
- whether the provision of personal data is a statutory or contractual requirement,

- whether the individual is obligated to provide the personal data
- the existence of automated decision-making, including profiling

#### 4.2. Right of access

Data subjects have a right to submit subject access requests and obtain information from Agency Partners Group about whether your personal information is being processed. Agency Partners Group is then obligated to provide a copy of personal data it has about you and additional information, including:

- what is the purpose of the processing
- what categories of personal data are they processing
- with whom the data is shared (third countries or international organisations)
- how long will the organisation keep the data (data retention period)
- information about their GDPR rights (right to rectification, right to erasure, restriction of processing, etc.)
- the existence of automated decision-making, including profiling
- what is the source of collected data (if the data is not collected from the individual)

#### 4.3. Right to rectification

The right to rectification allows data subjects to ask Agency Partners Group to update any inaccurate or incomplete data it has on them.

#### 4.4. Right to be forgotten

The right to be forgotten is also known as the right to erasure. This right allows data subjects to ask for their ur personal data to be deleted if:

- personal data is no longer necessary
- They have withdrawn their consent
- the personal data have been unlawfully processed
- they have objected to the processing, and Agency Partners Group has no reason to continue processing
- data erasure is necessary for compliance with a legal obligation (EU law or national law)

Although there are situations where Agency Partners can decline the request. For instance, for reasons in the public interest or compliance with legal obligations.

If data subjects exercise their right to erasure, Agency Partners Group has to notify any third parties with whom the data was shared and request the erasure of data.

Agency Partners have to comply unless it can prove that the request would require a disproportionate effort or if it is impossible to comply.

#### 4.5. Right to restrict processing

Data subjects can request that Agency Partners limits the way it uses their personal data. Agency Partners is not automatically obligated to delete the data. However, it has to refrain from processing it in certain situations:

- if the data is inaccurate (during the verification process);
- if the processing is unlawful, but you do not want the data to be erased and request restriction (which is different from the right to be erased);
- Agency Partners no longer needs data, but they want the data to be preserved so the legal claim can be exercised;
- Agency Partners is taking measures to verify the data erasure request.

Once the data is restricted, Agency Partners is not allowed to process it unless it has the data subject's consent, it needs it for legal claims or to protect the rights of other individuals.

#### 4.6. Right to data portability

Data portability allows data subjects to obtain personal data they have previously provided to Agency Partners in a structured, commonly used, and machine-readable format.

Data subjects can also request for their data to be transferred directly to another organisation. However, it can only be applied to the data if processing is carried out by automated means, no papers.

#### 4.7. Right to withdraw consent

The data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

#### 4.8. Right to object to processing

Data subjects have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on the following legal grounds:

- necessary to perform a task in the public interest; or
- necessary for Agency Partners's or a third party's legitimate interests.

Agency Partners shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of you or for the establishment, exercise or defence of legal claims.

#### 4.9. Right to object to automated processing

The data subject has 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.

#### 4.10. Exercising the rights

If you wish to exercise any of these rights, please contact us at hello@agency-partners.com.

Information will be provided at the earliest convenience, but at a maximum of 30 days from the date the request was received.

Where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months where necessary. However, this is only done in exceptional circumstances and you will be kept informed in wiring throughout the retrieval process of any delays or reasons for delay.

If for any reason, Agency Partners is unable to act in response to a request a written explanation to you will always be provided and you will be informed of your right to complain to the Supervisory Authority and to a judicial remedy.

Information provided, and any communication and any actions taken under shall be provided free of charge.

Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, Agency Partners may either:

- (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- (b) refuse to act on the request.

Where Agency Partners has reasonable doubts concerning the identity of the natural person making the request, it may request the provision of additional information necessary to confirm the identity of the data subject.

If Agency Partners does not comply with a request, it shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

#### 4.11. For EEA countries

#### Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes GDPR.

The list of the European supervisory authorities can be found here.

#### Right to an effective judicial remedy against a supervisory authority

Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.

Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged to it.

Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

#### Right to an effective judicial remedy against a controller or processor

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, you have the right to an effective judicial remedy where you consider that your rights under GDPR have been infringed as a result of the processing of your personal data in non-compliance with GDPR.

Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

## 5. LIST OF SUB-PROCESSORS

Third party	Data processed	Purpose	Country	Privacy policy
Agency Partners Kft.	Customers' and users' personal data	Employees involved into Agency Partners operations should have access to personal data	Google Cloud Platform	Agency Partners Privacy Policy
Firebase	Users' personal data	Database storage	Firebase	https://firebas e.google.com/ support/privac y
Google workspace	First name, last name, email, email communicatio n, project documentatio ns, email messages	Communicatio n with the Customers, Office tools (project documentatio n, documentatio n management, storage, email messaging)	USA	https://policies .google.com/p rivacy
La Growth Machine	Users' personal data	CRM:	France	https://lagrowt hmachine.co

Tracking leads  Sending emails, LinkedIn messages, Creating reports	m/privacy-poli cy/
---	-----------------------

## **ENTRY INTO FORCE**

This Privacy Notice may be changed unilaterally by the data controller at any time. Changes to this Privacy Notice will be published on this page.

This Privacy Notice enters into force on May 16, 2024.