



Privacy Policy

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1. Introduction

The present privacy policy contains important information about the processing of your personal data. By providing your personal data you accept the terms and conditions set forth in the present privacy policy. Please read this privacy policy regularly since the changes thereof shall be automatically applicable for processing the personal data provided by you even if a previous version of the privacy policy was in force when you provided your personal data. We shall publish the modification of the privacy policy on our websites and we shall also inform you in other forms, depending on what source we have your data available from. Please pay special attention to the provisions of the present privacy policy highlighted by italics because those may contain important provisions about the processing of your personal data.

In case data processing takes place on our website then by using the Website you accept the terms and conditions set forth in the present privacy policy irrespectively of whether you register on the Website or not. If you do not accept the provisions set forth in the privacy policy, do not use the Website.

The present privacy policy shall be applicable exclusively for the personal data of natural person data subjects considering that the data of legal entities or other organizations not qualified as legal entities shall not be qualified as personal data.

By signing the Agreement with Fintech Lab Kft. where the downloading location of the present privacy policy is indicated or by accepting the pop-up window related to the acceptance of the privacy policy on www.natrix.io website you shall agree that you have become aware of and accepted the provisions set forth in the present privacy policy.

2. Data processor

Name: Fintech Lab Kft.

Registered seat: 1061 Budapest, Andrásy út 33. 4. emelet 3.

Name of representative: Peter Horvath

Contact of representative: 1061 Budapest, Andrásy út 33. 4. emelet 3.

Mail address: 1061 Budapest, Andrásy út 33. 4. emelet 3.

Email address: info@natrix.io

Website: www.natrix.io

3. Definitions

Private person: Any specific natural person identified or directly or indirectly identifiable on the basis of personal data.

Personal data: Any data which can be related to the data subject or any data or information (name, identification number) on the basis of which a natural person can be identified either directly or indirectly. During the use of the Website and other software, in addition to the natural personal identification data, photos, gender, age, or any knowledge characterizing one or more physical, physiological, mental, economic, cultural or social identities shall be such in particular.

Data subject: any natural persons whose personal data is subject of any data processing. Fintech Lab Kft. shall provide the Services available on the Website exclusively to natural persons over the age of 18 therefore it developed its data processing policy in accordance with this circumstance. Considering that the consent of the legal guardian of children below the age of 16 shall be required for their declaration, Fintech Lab shall obtain the consent of the legal guardian in each case when it conducts data processing addressed to such data subjects.

Data controller: the person determining the objectives and means of processing personal data. In case of personal data processing performed via the Website the data controller Fintech Lab Kft. but in certain processes where this is expressly indicated, additional data controllers other than Fintech Lab Kft. also conduct data processing activity. Fintech Lab Kft. shall be qualified as data controller regarding any information and shall process all data provided by the Clients to Fintech Lab Kft., uploaded to the Website while visiting or using the Website or using any Service available on the Website or which is collected by Fintech Lab Kft. during the activities of the Users on the Website.

Data processor: the natural or legal person or any other body processing personal data on behalf of the data controller or performs data processing operations in terms of personal data. Fintech Lab Kft. uses several data processors for its data processing the person of which shall be indicated in relation with the individual data processing or reference shall be made to the categories of data processors.

Data processing: Automated or non-automated operation or set of operations performed on personal data for example collecting, storing, recording, disclosing, forwarding or using personal data. Any process in which personal data is made available for Fintech Lab Kft. shall be qualified as data processing.

Title of data processing: Fintech Lab Kft. shall process personal data typically for the purpose of concluding or performing agreement and legal obligations of Fintech Lab Kft. and on the basis of the

consent of the data subject where it is expressly indicated upon recording the personal data. Fintech Lab Kft. shall provide information on the title of data processing in relation with the individual data processing operations.

Consent: permission given by the data subject to the data controller to process their personal data for a specific purpose.

Voluntary and definite expression of the will of the data subject based on proper information and by which the data subject gives unmistakable consent to processing their personal data comprehensively or for certain operations.

Data processing purpose: the specifically determined purpose of processing personal data for example concluding or performing an agreement between Fintech Lab Kft. and the Client.

Scope of processed data: Fintech Lab Kft. shall provide the personal data processed upon the individual data processing.

Term of data processing: the period of time until Fintech Lab Kft. is entitled to process personal data which shall be provided by Fintech Lab Kft. upon the individual data processing.

Data not suitable for personal identification: data which is recorded by Fintech Lab Kft. about the users of the Website, but which is not suitable for directly or indirectly identifying a natural person.

4. General information in connection with data processing

4.1. The primary title of data processing by Fintech Lab Kft. shall be the performance of an agreement concluded with the data subject on the basis of section b), paragraph (1), Article 6. of the GDPR.

4.2. The Data subject shall be responsible for the truthfulness and accuracy of the personal data provided. Fintech Lab Kft. shall not be liable for the processing of incorrect or untrue data provided by the Data subject or for the damages suffered by the Data subject or any third person due to incorrect or untrue data provision. Fintech Lab Kft. shall not be responsible if Fintech Lab Kft. is deceived regarding the capacity of the Data subject.

4.3. In case of using the Website the title of data processing shall be consent (section a), paragraph (1), Article 6 of the GDPR). In case of data processing based on consent, the Data subject shall be entitled to withdraw such consent any time which however shall not affect the lawfulness of the data processing prior to such withdrawal. Data regarding the verification of the fact of consent shall be preserved by Fintech Lab Kft. until the possibility of verifying such consent or any other legitimate interest of Fintech Lab Kft. makes it necessary. Consent is given by using the website via implicit acceptance.

4.4. Unless otherwise regulated by law, the personal data made available for Fintech Lab Kft. shall only be processed by Fintech Lab Kft. only for the purposes described in the present policy to the extent required to implement such purposes.

4.5. Fintech Lab Kft. performs profiling.

Profiling: automated processing of personal data when personal data is used for the assessment of certain personal characteristics (e.g. workplace performance, economic/financial situation, health condition, personal preferences, interests, reliability, behaviour) related to a specific natural person, the analysis or prediction of place of staying or moving.

Fintech Lab Kft. performs profiling. Fintech Lab Kft. groups the names and e-mail addresses of registered persons in order to provide relevant content and information and to send marketing newsletters to its users periodically. Such profiling does not consist of automated decision-making.

5. Data processing performed by the company

Let us call the attention of data subjects that the company shall store the data after the termination of the agreement under section f), paragraph (1), Article 6. of the GDPR for the purpose of enforcement of its legitimate interests. Let us inform you that you shall be entitled to object to such data processing based on legitimate interest any time at the representative of the company, in which case the company shall delete your personal data.

5.1./ Operation and Use of the Website and Registration

Scope of data processed	Purpose of data processing	Title of data processing	Data processor	Term of data processing
Client name*, email address*,	Operation of services available by the Website (from the website), creating registration	Section a), paragraph (1), article 6 of the GDPR - consent	Amazon Web Services (AWS), Google	Until the cancellation of registration or withdrawal of consent.

Data marked with * shall be provided for registration. In the event that you do not provide the data, you cannot register.

Regarding data collected while browsing the Website, please see our cookie policy (section 12).

5.4./ Other communication and complaints

Scope of data processed	Purpose of data processing	Title of data processing	Data processor	Term of data processing
Name, email address, phone number, home address (depending on what data is provided by the Data subject or through what channel communication takes place)	In case of contact made by the Data subject the purpose of data processing subject to the purpose of contact (e.g. reply to incoming emails, actual management of complaint and information about the measures taken, etc.)	Section f), paragraph (1), article 6 of the GDPR - legitimate interest Description of legitimate interest: later proof of content of communication with clients, complaint management, quality assurance.	Amazon Web Services (AWS)	Depending on the nature of communication or complaint but in each case at least for 5 years following the management of the complaint

5.5./ Data processing for marketing purposes

Scope of data processed	Purpose of data processing	Title of data processing	Data processor	Term of data processing
Name, home address, phone number, email address	Sending newsletters related to the services of Fintech Lab, direct marketing	Section a), paragraph (1), article 6 of the GDPR - consent	SendGrid	Until the withdrawal of consent

6. Term of data processing

6.1. Data shall be deleted 5 years after the cancellation of service considering that it may be necessary to contact the client within the 5-year limitation period.

6.2. The term of data processing for the purpose of client identification and due diligence under act of 2017 on the prevention of money laundering and the financing of terrorism in force in Estonia as well as for purpose of performing data supply under the same act shall be 5 years.

6.3. Under act of 2002 on accounting in force in Estonia, the preservation period of receipts of financial transactions shall be 7 years.

7. Data processing

7.1. Data processor shall be the natural or legal person or any other body processing personal data on behalf of the data controller. Data processing shall not mean authorization to make decisions related to the data: the data processor shall execute the data processing decisions of the data controller.

7.2. Data shall be forwarded exclusively for the purpose of performing services and fulfilling statutory obligations to accountants, shipping companies, card issuers, financial institutions and contractual partners.

7.3. The data processor shall not make definitive decisions regarding the data processing and it shall process personal data obtained exclusively on the basis of the instructions of Fintech Lab Kft.; it shall not perform data processing for its own purposes furthermore it shall store and preserve personal data according to the instructions of Fintech Lab Kft..

7.4. Name of data processors:

I./ Amazon Web Services (AWS)

Address: 1200 12th Ave S, Ste 1200, Seattle, WA 98144, United States

Web: <https://aws.amazon.com>,

GTC: https://aws.amazon.com/privacy/?nc1=f_pr

Task of data processor: operation of website and hosting.

II./ SendGrid

Web: <https://sendgrid.com/>

GTC: <https://sendgrid.com/policies/privacy/>

Task of data processor: storing names and e-mail addresses for later use and target group segmentation for the purpose of profiling.

8. Forwarding data to third country

8.1. Fintech Lab shall not forward personal data to any third country.

8.2. In the event that such data forwarding becomes necessary then Fintech Lab shall request the personal consent of the client involved to the data forwarding, informing the client about the purpose and circumstances of such data forwarding as well as the provisions set forth in Article 13 and section a), paragraph (1), Article 49. of the GDPR.

9. Data security

9.1. In the scope of data security measures the company shall take in particular those technical and organizational measures and establish those procedural rules which ensure that the data processed shall be protected from unauthorized access, modification, forwarding, disclosure, deletion, destruction, accidental termination or damage, furthermore against becoming inaccessible due to the change of the technology applied.

9.2. The company shall take the development of technology into consideration at all times when determining and applying the measures serving data security. In case of several possible data processing solutions, the company shall choose the one providing higher level of protection for personal data except if such solution would constitute unreasonable difficulty for the company. The company shall enforce such requirements towards the data processors as well.

9.3. The company shall take obligation to call any third party to which it may forward or hand over data to observe the above commitments. In case of legitimate data forwarding by the company, the company shall not be responsible for damages caused by the recipient.

10. Rights of data subjects related to the processing of their personal data

10.1. Data subjects may at any time request information at the contacts indicated in the present policy about the data processing related to them, may request the correction, cancellation or restriction of use of their data and may object to the processing of such personal data.

10.2. Fintech Lab Kft. shall inform the Data subject without unreasonable delay but within one month of the reception of the request by all means about the measures taken as a result of the request below. If necessary, taking the complexity and the number of requests into consideration, such term may be extended by two additional months. Fintech Lab Kft. shall provide information about the extension of the term, also indicating the causes for the delay within one month of the reception of the request. If the request was received electronically, the information shall also take place electronically if possible, except if the Data subject otherwise requests. If Fintech Lab Kft. judges so that we do not need to take measures upon the request of the Data subject then we shall inform the Data subject without delay but within one month from the reception of the request the latest about the reasons for the omission of measures and that the Data subject may make a complaint at the data protection authority and may exercise its right to remedy in front of the court of justice.

10.3. Requests shall be fulfilled free of charge, if however the request is clearly unfounded or excessive especially due to its repeated nature, the company may take the administrative costs arising from the request into consideration and charge a reasonable fee or refuse to fulfil the request.

10.4. If there is founded doubt in relation with the person of the Data subject submitting the request, further information may be required to confirm identity.

10.5. Upon request of the Data subjects, Fintech Lab Kft. shall provide information whether their personal data is being processed and if it is, the Data subjects shall be entitled to access their data processed by Fintech Lab Kft. as well as the information on the purpose of data processing, the categories of the data involved, the recipients or recipient categories to whom the personal data was or will be disclosed, the planned term of data processing or the factors of determining such term as well as the source of data (right of access).

10.6. Upon request, Fintech Lab Kft. shall provide the Data subjects with the copy of the personal data processed. For additional copies requested by the Data subjects a reasonable fee may be charged on the basis of administrative costs. If the Data subject submitted the request electronically, the information shall be provided in a widely used electronic format except if the Data subject requests otherwise.

10.7. The Data subject may request the correction of inaccurate data and shall be entitled to request the completion of incomplete data.

10.8. The Data subject may request Fintech Lab Kft. to delete the personal data if:

- such data is not needed any longer for the purpose of the data were processed;
- the Data subject withdraws consent and there is no other title for data processing;
- the Data subject lawfully and successfully objected to the processing of personal data and such data processing is;
- data processing is unlawful;
- data shall be deleted in order to fulfil a legal obligation of Fintech Lab Kft.;
- the Data subject is a minor, below the age of 16.

10.9. Upon the above request, Fintech Lab Kft. shall delete the data except if further data processing is required for:

- exercising the right to freedom of opinion and expression as well as information;
- fulfilling the legal obligation of Fintech Lab Kft. requiring such data processing;
- the purpose of presenting, enforcing or protecting legal claims.

10.10. Upon request from the Data subject Fintech Lab Kft. shall restrict data processing if:

- the Data subject disputes the accuracy of personal data in which case the restriction shall apply for the period of time allowing for supervision of the accuracy of data;
- although the data processing is unlawful, the Data subject objects to deletion and requests restriction instead;
- Fintech Lab Kft. does not need the data processing any longer but the Data subject requests it for presenting, enforcing or protecting legal claims;
- the Data subject objected to the data processing; in which case the restriction shall apply for the period of time until it is concluded whether the legitimate reasons of the data processor have priority against the legitimate reasons of the Data subject.

10.11. If the data processing is restricted according to the foregoing, such personal data shall only be processed (except for storage) with the consent of the Data subject or for the presentation, enforcement or protection of legal claims or in order to protect the rights of other persons or for the important public interest of the Union or a member state. Fintech Lab Kft. shall inform the Data subject requesting the restriction about the resolution of the restriction in advance.

10.12. Fintech Lab Kft. shall notify the Data subject and anyone else to whom it had previously forwarded the data about correction, deletion or restriction. Fintech Lab Kft. shall omit such notification if it is impossible or requires great effort. If Fintech Lab Kft. disclosed the personal data and is obliged to delete it, it shall take the reasonable expected measures taking the available technology and the costs of implementation into consideration, including technical measures as well in order to inform the data processors processing the data that the Data subject requested them to delete the links referring to the given personal data or the copies and counterparts of such personal data.

10.13. The Data subject may object to the processing of their personal data

a) if it takes place on the basis of legitimate interest; in which case the data processing shall not be continued except if it is reasoned by forcing legitimate causes related to the presentation, enforcement or protection of lawful claims enjoying priority over the interests, rights and freedoms of the Data subject;

b) if it takes place for or in connection with direct marketing; in which case the data processing shall not be continued in the future for this reason.

Sections 10.2-10.4. shall be governing in case of objection as well.

10.14. On the basis of data portability, the Data subject on the one hand may request Fintech Lab Kft. if it is technically viable to receive its widely used data processed in a machine-readable format and to personally forward it to any data processor.

10.15. If Fintech Lab Kft. does not fulfil the above request of the Data subject it shall inform the Data subject about the reason thereof within one month of the reception of the request.

10.16. In the event that according to the view of the Data subject, its rights related to its personal data were injured, please make a complaint to Fintech Lab Kft. at the contacts provided.

10.17. You may also address the authorities irrespectively of notifying Fintech Lab Kft.. You can make a complaint at the competent supervisory authority, which is the National Authority for Data Protection and Freedom of Information in this case:

Name: National Authority for Data Protection and Freedom of Information

Mail address: 1530 Budapest, Pf. 5

E-mail address: ugyfelszolgalat@naih.hu

Web: <http://naih.hu>

10.18. In addition to the above, in case of unlawful processing of your data, you can also address the competent court of justice and initiate a civil lawsuit.

The lawsuit shall be judged by the court of justice. The lawsuit may be filed to the court of justice with jurisdiction in your residence (you can find a list and contact of courts of justice at the link below: <http://birosag.hu/torvenyszekek>).

11. Changes of the privacy policy

11.1. The changes of the privacy policy shall be published on the Website. The privacy policy in force at all times shall always be applicable for processing the personal data even if a previous version of the privacy policy was in force when the Data subject registered or provided their personal data otherwise.

12. Cookie policy

1. Meaning of cookie

“Cookies” are files sent by the web server with variable content consisting of letters and numbers saved and stored on the computer of the user for a pre-defined period of time. Cookies allow our web server to recognize your browser and your browsing history of the Website. With the help of cookies we can get an image about the habits and history of the user visiting our website and using the internet. Cookies do not contain any data through which the visitors to the website can be identified, those are exclusively suitable to recognize the computer of the user.

If you need further information about these cookies and their operation, you can find detailed information at www.allaboutcookies.org or www.aboutcookies.org.

2. Acceptance by visiting the Website

When you visit our Website, the Website collects data with the help of the aforementioned cookies.

When you visit our Website, with a click, you may accept the use of cookies incapable of identifying persons by the website in accordance with our privacy policy.

You can maintain and/or delete cookies as you wish. If you need more detailed information about this, please visit www.aboutcookies.org. You can delete all the cookies stored on your computer and you can ban their installation in most browsers. In such case you might have to do certain settings manually each time you visit a given website and you may also experience that certain services and functions might not work.

3. Cookies used on our website

3.1. Necessary cookies

These cookies are needed for the user to navigate between sites and pages and access protected contents (e.g. accessible for registered users only) in certain cases. These are temporary cookies stored in the cookie file of the browser until you leave the Website. They are necessary for the operation of certain applications or functions of the Website.

3.2. Functional cookies

These cookies are needed for the us to collect information about the website using habits of the user (e.g. language, quick test filling, subscribing for newsletters). These cookies are used to provide a better user experience. This type of cookie stays in the cookie file of your browser for a longer period of time. This period of time depends on your browser settings. These cookies forward information to the web server in each case when you visit the Website.

Cookie name	Cookie ID, type	Cookie Provider	Cookie purpose	Duration
SSID	http	google.com	Google collects visitor information for videos hosted by YouTube on maps integrated with Google Maps.	Persistent
SIDCC	HTML	google.com	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized access.	3 months
SID	HTML	google.com	Security cookie to confirm visitor authenticity, prevent	2 years

			fraudulent use of login data and protect visitor data from unauthorized access.	
SEARCH_SAMESITE	HTML	google.com		6 months
SAPISID	HTML	google.com	Google collects visitor information for videos hosted by YouTube.	Persistent
S	http	docs.google.com	The "S" cookie may collect certain information used to help improve services, including the pages users visit most often and whether users get error messages from certain pages. This cookie may also be used to anonymously measure the effectiveness of PPC (pay per click) and affiliate advertising.	Session
HSID	http	google.com	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect user data from unauthorized access.	2 years
cookie_status	HTML	www.natrix.io	To store user cookie consent information	30 days
_gat	HTTP	google.com	Universal Analytics to throttle the request rate to limit the collection of data on high traffic sites.	1 day

DV	HTTP	google.com	Used to collect information about how visitors use our site which we use to compile reports to help us make improvements. The cookies enable the collection of information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	1 year
OTZ	HTTP	google.com	“OTZ” is a cookie used by Google Analytics that provides an aggregate analysis of Website visitors.	

3.3. Third-party cookies

Third-party cookies are downloaded by the User's browser when viewing the Website, but not from the (sub) domain of the Company, but from a third party (typically an advertiser or Facebook) domain, since the Website partly consists of such Third-party modules. Third-party cookies are returned to a third party when, for example, a User views an ad or visits their website. These cookies are used by a third party (such as an advertiser) to track the user's complete browsing history for websites that contain so-called "third party" modules (e.g., advertising module, ads).

Most browsers have privacy settings that allow you to block / disable Third-party cookies.

The Company has no control over Third-Party Cookies, so Users are requested to review these Third-Party Cookies Information. (Google Analytics, Gemius, facebook, doubleclick)

Cookie name	Cookie ID, type	Cookie Provider	Cookie purpose	Duration
__Secure-SSID	http	google.com	Stores information about how the visitor uses the website and about the advertisements that may have been seen before the visitor visits the website. Also used to customize ads on Google domains.	8 months
__Secure-HSID	http	google.com	To secure digitally signed and encrypted data from the unique Google ID and store the most recent login time that Google uses to identify visitors,	8 months

			prevent fraudulent use of login data and protect visitor data from unauthorized parties. This can also be used for targeting purposes to display relevant and personalized advertising content.	
__Secure-APISID	HTML	google.com	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	8 months
__Secure-3PSID	http	google.com	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years
__Secure-3PAPISID	HTML	google.com	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years
NID	http	google.com	Stores visitors' preferences and personalizes ads on Google websites based on recent	6 months

			searches and interactions.	
CONSENT	HTML	google.com	Stores visitors' preferences and personalizes ads.	30 days
APISID	HTML	google.com	Personalizes Google ads on websites based on recent searches and interactions.	2 years
ANID	http	google.com	Lists ads on Google sites based on recent searches.	Persistent
1P_JAR	HTML	google.com	Based on recent searches and previous interactions, custom ads are shown on Google sites.	30 days

4. Newsletters, e-mails

You can also subscribe for our newsletter on our Website and contact us any time also regarding unsubscribing the newsletter. This latter is required to ban us collecting data on whether you opened the newsletters and e-mails we had sent you.

Upon interpreting the present policy, the provisions of our data protection policy shall be applicable.

5. Individual cookies used on our website

5.1. Google Analytics:

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer, to help you analyze the use of a web page that a User visits.

The information generated by the cookies associated with the User's use of the Site is typically stored on a Google server in the US. By activating the IP anonymization web site, Google will shorten the User's IP address within the Member States of the European Union or other States party to the European Economic Area Agreement.

The full IP address will only be forwarded to Google's server in the US and shortened there only in exceptional cases. Google will use this information on behalf of the operator of this web site to evaluate how the user has used the web site, to report web site activity to the web site operator, and to provide additional services related to the use of the web site and the Internet.

Within Google Analytics, the IP address transmitted by the User's browser is not reconciled with other Google data. The User may prevent the storage of cookies by properly configuring his / her browser, however, please note that in this case, not all features of this website may be fully utilized. You may also prevent Google from collecting and processing your cookie-related information about your use of the Website (including your IP address) by downloading and installing the browser plug-in available at the following link. <https://tools.google.com/dlpage/gaoptout?hl=hu>

5.2. SendGrind:

A cloud based service used for sending Company newsletters and marketing emails.

6. Switching off and deleting cookies

You can switch off the use of cookies in most browsers.

Setting this depends on the type of the browser. You can find information about switching out cookies in the “HELP” menu of your browser.

You can switch of cookies in the settings menu of your browser, in different submenus depending on the given browser.

13. Contact

If you have any questions, remarks or requests regarding the present privacy policy, or you wish to make a complaint or exercise your rights set forth in Section 10, please contact us at the contact details provided in Section 2.

The present privacy policy shall be in force from 16th July 2020.