

PRIVACY POLICY

This privacy notice explains that the LABTECH LTD. (Headquarters: 4031 Debrecen, Vág Street 4, company registration number: 09-09-000369) and its affiliates (hereinafter referred to as Labtech, "we", "us"), the mobile application ("App") and its website, <http://www.labtech.hu> (the "Site") (collectively, the "Services"), how collect, treat, transmit and protect the personal information of its customers.

The Labtech Ltd. pays particular attention to the collection, management, use, processing and transmission of personal data related to Act CXII of 2011 on Informational Self-Determination and Freedom of Information Law, Act CVIII of 2001 on electronic commerce services and certain aspects of information society services, Act CXIX of 1995 on the management of data of name and address for the purpose of research and direct marketing, over and above 2016/679/EU Directive (i.e. General Data Protection), which takes effect from 25 May 2018, on the protection and the free movement of such data used with effect of natural persons in the processing of personal data in respect of the provisions of keeping proceed.

Your privacy matters to Labtech, so whether you are new to Labtech or a long-time user, you can get to know our practices below, and contact us at <http://www.labtech.hu/contact> or via medical@labtech.hu email address if you have any questions.

This Privacy Statement is an integral part of the contract ("Contract") between you and Labtech Ltd.

By signing a contract with Labtech Ltd. (written order) you acknowledge that the information in this Privacy Statement has been recognized and consented to the processing and registration of the information you provide by Labtech Ltd. under the applicable laws; at the same time, they will contribute to the availability of their contact information in database of Labtech Ltd. in order to inform you about the data, its changes related to the services of Labtech Ltd, and other changes affecting you.

1. INTERPRETATIVE PROVISIONS

Affected	Any natural person identified or directly or indirectly identified by personal data;
Personal data	Data related to the affected, in particular the name, identifying mark, and the knowledge of one or more physical, physiological, mental, economic, cultural or social identities of the person concerned, as well as the deduction from the data to the person concerned;
Contribution	Voluntary and decisive disclosure of the will of the affected, based on appropriate information, and giving him/her an unmistakable consent to the handling of his or her personal data, whether complete or for specific transactions;
Protest	The statement in question, which objects to the processing of personal data and calls for the elimination of data management, and managed data to delete;
Controller	Any natural or legal person or organization without legal personality who or which alone or jointly with others, determines the purpose of the processing of the data, makes decisions on data processing (including used items) and implement or enforce the processor;

Data processing	Regardless of the method used in any operation or set of operations, in particular the collection, recording, organization, storage, alteration, use, availability, transmission, disclosure, alignment or combination, blocking, erasure or destruction, and the data carried on the data preventing, photo, or sound or video recording, preparing and recording the identity of the physical attributes (such as fingerprints and palm prints, DNA samples and iris image.) for further use;
Data transmission	Making the data available to a third party for specified;
Disclosure	Making the data available to anyone;
Data deletion	Data obscure, so that the restoration is no longer possible;
Data processing	Perform technical tasks related to data management operations, irrespective of the method and device used to perform the operations and the location of the application, provided that the technical task is carried out on the data;
Data Processor	Any natural or legal person or organization without legal personality, who is under contract - including concluded under the provisions of the act is a contract - is processing data;
File	All the data processed in one register;
Third person	Any natural or legal person or a non-legal entity that is not the same as the data subject, the data controller or the data processor;
EEA State	EU Member States and parties to the Agreement on the European Economic Area, other states, as well as the State party to the Agreement on the European Economic Area under the Agreement between the European Union and its Member States, and the state is not party to the Agreement on the European Economic Area, a national an international treaty State enjoy the same legal status of citizens;
third Country	Any State which is not an EEA State;
Privacy Incident	Illegal handling or processing of personal data, including unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage.

2. PROCESSED PERSONAL DATA

The personal data of the customers / business partners processed by Labtech Kft. are listed for each data processing in the table in Chapter 4.

The company data included in purchasing or supply contracts or business documents or records are not considered personal data.

The personal data stored in the memory of the recorders returned for service or fixing to Labtech Ltd. (including ECG measurements, the mobile device accelerometer data, the average heart rate, which part of the the human body the ECG recording was taken, local time, time zone and geographic location, etc.) is not processed and stored by Labtech Ltd. , We returned to our company products (including himself ECG measurements, the mobile device accelerometer data, the average heart rate to the human body in which part of the ECG recording, local time, time zone and geographic location), our company does not handle patient data in adahordozóin and not stored.

3. THE PERSONS AFFECTED BY DATA PROCESSING

The persons affected by the data processings listed in the table in Chapter 4 are the Office-holder's and contact person's of the organizations that are in business relationship with Labtech Ltd. (by buying the products provided by Labtech Kft. or supplying goods or services for Labtech. Ltd).

We handle and process the data only of the persons who are not protesting against the processing and provide their personal data according to their free will.

If the lawful basis of data management is the "given consent" Labtech Ltd. provides detailed unambiguous information related to the data processing and requires a clear affirmative freely given consent of the concerned persons.

Labtech Kft. as controller handles and proceeds the data only for purpose specified in the table referred in Chapter 4 and only for the period of time fixed in the table.

The data is available only for data processors in the table and is not disclosed for unauthorized third party.

By providing personal data for Labtech Ltd. you guarantee the data is correct, accurate and up to date.

If the source of the personal data is the employer of the concerned private person Labtech does not take the responsibility the consent to the data processing of the employee to be obtained directly.

Labtech Ltd. excludes its liability in cases of invalid or false personal data provided by data sources.

4. DATA TREATMENTS

The purpose of processing	Lawful basis	Possible consequences of failure to provide the data	Processed data	The period for which the personal data will be stored
Providing commercial quotation	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	There will be no product sales, or support	The contact person's – name; – e-mail address*; – phone number	5 years from the quotation Data processor: MULTI HARDWARE LTD.
Contract with a company related to sales and/or exclusivity or purchasing			Office-holder's and contact person's – name; – position; – e-mail address*; – phone number	15 years after the last invoice issuance Data processor: MULTI HARDWARE LTD.
Customer service			The contact person's – name; – e-mail address*; – phone number	
Delivery			The contact person's – name; – position; – e-mail address*;	
Service and repair				

The purpose of processing	Lawful basis	Possible consequences of failure to provide the data	Processed data	The period for which the personal data will be stored
			– phone number – billing and shipping address **	
Invoicing to companies	Processing is necessary for compliance with a legal obligation to which the controller is subject	The content requirements related to the invoice are not met and the organization can be penalized	The contact – name; – position; – e-mail address*; – phone number	Storage period according to the Accounting Law Data processor: Audit-Accounting Office Ltd. Labtech. MULTI HARDWARE LTD.
Invoicing to private persons or contractors			name; Tax identification number (private person); Tax Number (contractor); billing and shipping address**; e-mail address*; phone number	
Business correspondence and issuing advisory notices	The data subject has given consent to the processing of his or her personal data for one or more specific purposes	The provision of information is not efficient and timely	The contact person's – name; – position; – e-mail address*; – phone number	The withdrawal of the consent or change of the e-mail address Data processor: MULTI HARDWARE LTD.
Download documents and software from http://www.labtech.hu/				
Information in newsletters about Labtech Kft. Ltd., availability and products				The withdrawal of the consent or change of the e-mail address Data processor: The Rocket Science Group, LLC

* In case of official correspondence the e-mail can be considered personal data if it contains the name of the private person

** In case private persons or contractors using the private address

5. THE DURATION OF DATA PROCESSING

Data management exclusively to the extent that time and only with the personal information necessary to achieve that purpose, which is essential for accomplishing the purpose of the data processing is necessary and otherwise appropriate to achieving the goal, particularly as related to your information policy, performance and related administration services Rights and obligations are met.

The following were taken into account when determining the storage period for personal data:

- a) the limitation period for claims arising from a contractual relationship between you and Labtech Ltd. as well as
- b) the limitation period for claims related to legal obligations imposed on Labtech Ltd. under the Contract

of which is longer period.

Each data storage duration is described in the table of Chapter 4.

If a data occurs in more than one data management, the longer duration of the table will be used to determine the storage time for the data. Of course, the data so stored can only be used for data processing that is still in force.

6. THE PROCESSING OF DATA

The personal statement is addressed to the Labtech Ltd. within:

- The company's senior management
- The commercial department employees
- The testing department and support staff employees
- The service department employees
- The quality assurance department employees

Labtech Ltd. take advantage of the following data processors contribution of data management activities:

Data Processor	Target	relationship
Audit-Accounting Office Ltd. Labtech.	accounting activities	4025, Bem tér 14. I / 4th Tax ID: 14138610209 Contact: Andrea Monori Tel: +36 52 522 090
MULTI HARDWARE LTD.	IT Administrator	4031 Debrecen, Határ út 2. Tax ID: 12637058209 Contact: Ferenc Puskas Tel: + 36 52-453-223
The Rocket Science Group, LLC Mailchimp.com	Newsletter Service	The Rocket Science Group, LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA

7. ENTITLED TO DATA RECOGNITION

By signing a contract with Labtech Ltd (written order), you expressly consent to the personal data provided by you being the employees, senior officers, consultants, data processors or other employees of Labtech Ltd. and the partners to whom you have contributed, become acquainted and treated.

Based on regulatory requirements, the courts and authorities have the power to get to know some of the personal information treated.

8. DATA TRANSFER AND TRANSMISSION

We are aware that your data is valuable and will do our best to protect them in our data management.

In some cases, we share the personal information with third parties who are cooperating with us or acting on our behalf, if this is necessary to achieve the purpose for which the data subject or the data has been disclosed. Your personal data may also be transferred to other third parties by Labtech Ltd. if this serves you for more efficient service, or if those third parties handle the data on behalf of Labtech Ltd. however, we have made sure that these third parties adequately protect information and data.

Labtech Ltd. may transfer personal data to third-party processors providing the appropriate level of technical and organizational guarantees. Labtech Ltd. may, in accordance with generally accepted data protection practices, use external service providers to perform regular server maintenance, data storage or other IT tasks.

We will share information with other third parties only if:

- we have the consent of the person concerned;
- it is prescribed by law; or
- for the purposes of legal proceedings, in connection with them or in the exercise or protection of the rights conferred by law.

By signing the Contract (written order), you expressly consent to the transfer of such data and warrant that personal data will be transferred to Labtech Ltd. for this purpose.

As soon as the terms and conditions for legitimate handling or transfer of data are terminated, Labtech Ltd. shall immediately arrange for the deletion of personal data from the database and will notify you of the fact of the cancellation.

9. DATA SECURITY

In the course of data processing, Labtech Ltd. has become aware of the data stored in the electronic information system and stored on the traditional paper media with utmost care, strict confidentiality and with all legitimate means of protecting them, in particular by unauthorized access, alteration, transmission, disclosure, other abuses, deletions or destruction, as well as accidental destruction and damage by technical and organizational measures.

The IT system of Labtech Kft provides adequate security to manage data in an electronic information system. Our data controllers and partners, like Labtech Ltd, are responsible for protecting the data and are strictly used only for purpose. The data processed are accessible to authorized persons, data is credible and authenticated, data is unchanged and data is protected against unauthorized access.

Labtech Ltd. protects the data, in particular, against unauthorized access, alteration, transmission, disclosure, deletion or destruction, and incidental destruction and damage. Labtech Ltd. provides data security with technical, organizational and organizational measures that provide a level of protection that meets the risks associated with data management. We have adopted generally accepted technology and operational security solutions to prevent the loss, modification, destruction, or abuse of identifiable personal data. To the greatest extent possible, we ensure that the confidentiality of the personal data handled by Labtech Ltd. is ensured through appropriate confidentiality commitments and technical and safety measures. We only have access to personal data with our legitimate employees with confidentiality obligations and authorized data controllers.

10. NEWSLETTER

By ordering the services or products of Labtech Ltd. and giving your email address in the contract (written order) to Labtech Ltd. you agree that Labtech Ltd. provides you professional materials and informs you about other information about Labtech Ltd. and send you notifications in newsletters. Subscribing is voluntary and can be revoked at any time by using the link in the newsletter or by answering an email.

Labtech Ltd. creates a database of people who provide corporate contact information as contact information (company name, name, position, company email address), which the organizations listed in the database (to the contact details of the company's e-mail address) Labtech Ltd. will regularly send newsletters to them in the topics they may be interested in.

The newsletter sending service invokes the attention of the organizations represented by the contact points to the current rules related to the activities of Labtech Ltd. and to their changes and it also provides guidelines for the practical application of certain rules, offering an opportunity to participate in online and offline events requiring personal appearance, in addition, it gives direct access to Labtech's employees' contact details.

Newsletters and presentations are not for contact persons as individuals, but for organizations that are related to you, furthermore the provided data related to the above mentioned data process Labtech Ltd. stores and processes as company contact information and not as personal contact details.

Labtech Ltd. reserves the right to exclude anyone from the newsletter at any time.

The data are handled by Labtech Ltd. as long as their deletion is not requested by those concerned.

11. COOKIES

When you visit our Services or open our emails, we may collect certain information by automated means, such as cookies, web beacons and web server logs. The information we collect in this manner includes IP address, browser characteristics, device characteristics, operating system version, language preferences, referring URLs, information on actions taken on our Services, and dates and times of website visits. The information does not identify you. If you continue to use our Services, we will assume that you permit this collection. If you want to use the Services without cookies you may opt out at <http://www.labtech.hu/aboutus/privacy>. Please note, however, that without cookies you may not be able to use all of the features of our Services.

We use cookies, web beacons, web server logs and other automated means for purposes such as (i) customizing users' visits to our Sites, (ii) delivering content tailored to users' interests and the manner in which users browse our Sites, and (iii) managing our Sites and other aspects of our business.

We may use third-party web analytics services on our Services, such as those of Google Analytics. The analytics providers that administer these services use technologies such as cookies, web server logs and web beacons collect usage information matched to an IP address, but not your personal information, to help us analyze how visitors use the Sites and improve the overall experience of the Sites. The analytics providers may also collect information about your use of other websites over time, if those websites also use the same analytics providers. To learn more

about Google Analytics and how to opt out, please visit <http://www.google.com/analytics/learn/privacy.html> .

We may use third-party services on our Services, to collect usage data in order to understand and continue improving our products and services.

12. THE RIGHTS OF ACCESS TO THE DATA MANAGEMENT

12.1. Request for information

Persons concerned may request information about the personal data handled by Labtech Ltd., their source, the purpose, legal basis, duration of the data processing, the name, address and data management of the data processor, and, in the case of transmission of personal data, its addressee.

The request for information is only personally fulfilled by Labtech Ltd. For this purpose, the request for information may be sent to Labtech Ltd. in the form of a private document with full probative force, by email or by fax, by sending the appropriate identification information in writing. Labtech Ltd. will provide the information in writing to the address given by you in the shortest possible time, but not later than 30 days.

Please note that information on a particular datum per year is free of charge, for further information Labtech Ltd. may charge reimbursement.

12.2. Rectification

If the person concerned informs Labtech Ltd. that the personal data processed does not correspond to the reality or that Labtech Ltd. is aware otherwise of the personal data and the correct data, then the personal data is corrected by Labtech Ltd. Labtech Ltd. notifies the person concerned of the rectification or refusal of his claim for correction or rectification.

12.3. Erasure or blocking

Affected parties are entitled to request the deletion or blocking of their personal data. Personal data will be blocked if it is based on the information available that the deletion would be prejudicial to the legitimate interests of the person concerned. The locked personal data will only be treated until the purpose of the data protection is excluded that excludes the deletion of personal data. We will notify you of the cancellation or blocking, or we will notify you of the rejection of your request for deletion or blocking.

12.4. Protest

Affected - except in cases of compulsory treatment - are entitled to object to the processing of personal data

- if the processing or transmission of their personal data is necessary solely for the fulfillment of the legal obligation of Labtech Ltd. or for the validation of the legitimate interests of Labtech Ltd. or a third party; or
- if the use or transfer of their personal data is done for direct business acquisition, opinion polling or scientific research, if they have not contributed to it; or
- in other cases specified by law.

Labtech Ltd. Shall review the protest within the shortest possible time, but within a maximum of 15 days of the submission of the request, to make a decision on its validity and inform the applicant in writing of its decision.

If the protest is well-grounded, Labtech Ltd. discontinues the processing of data, including further data collection and data transmission, locks the data and notifies the protest and the measures taken on the basis of those who have previously communicated the personal data affected by the protest and who are obliged to take action to enforce the right to protest.

12.5. Refusal to cooperate on direct marketing

Those concerned have the right to deny direct business acquisition mails, so-called direct marketing letters, at any time without justification.

13. NOTIFICATION OF CHANGE OF DATA

You have the right to declare changes to the data managed by Labtech Ltd. within 15 days within your own disposition. You will be responsible for all the consequences of failing to do so.

14. RIGHT OF REMEDY

With regard to personal data protection and data handling issues, the persons concerned may appeal to the National Data Protection and Information Authority (1125 Budapest, Szilágyi Erzsébet fasor 22 / c., Postal address: 1530 Budapest, Pf.:5) and apply for legal remedy.

15. LIMITATION OF RIGHTS

In exceptional cases, rights under the above may be restricted by a statutory provision, in particular to protect the rights of the data subject or others.

Labtech Ltd. performs data service contrary to your data management statement only and solely for the purpose of obtaining legal entities authorized by law, in statutory cases.

16. OTHERS

Labtech Ltd. reserves the right to make unilateral modifications to this Privacy Policy at any time. You will be informed in writing about the change in your information in one of the contact details given in the contract.

Should you have questions or comments please do not hesitate to contact Labtech Ltd. in any of the following contact details:

- Phone: + 36-52-500-128
- E-mail: medical@labtech.hu
- Address: 4031 Debrecen, Vág street 4.
- Mailing address: 4031 Debrecen, Vág street 4.

Date: Debrecen, 24/05/2018.