

## PRIVACY POLICY

This data management information describes that LABTECH Ltd. (registered office: 4031 Debrecen, Vág út 4., company registration number: 09-09-000369) and its partners (hereinafter: Labtech, "we"), its mobile application ("App") and its website, <http://www.labtech.hu> (the "Site") (collectively, the "Services") collects, manages, uses, transmits and protects the personal information of its customers.

Labtech Ltd. pays special attention to the fact that during the collection, handling, use, processing and possible transmission of personal data, Act CXII of 2011 on the right to information self-determination and freedom of information. Act CVIII of 2001 on certain issues of electronic commerce services and information society services. Act 2016/679 / EU on the protection of individuals with regard to the processing of personal data and on the free movement of such data, ie the GDPR and other relevant legislation, national and international recommendations.

Data protection is important for Labtech Ltd., so be it a new or old user, you can get to know our practice below, and in case of further questions, contact us at <http://www.labtech.hu/kapcsolat/> or at [medical@labtech.hu](mailto:medical@labtech.hu) email address.

This data management information is an integral part of the contract (the "Contract") concluded between Labtech Ltd. and you.

### 1. Explanatory Provisions

<b>Affected person</b>	Any natural person identified or identifiable, directly or indirectly, on the basis of personal data;
<b>Personal data</b>	Any data that can be related to the Customer - especially the name, username of the customer and any knowledge characteristic for one or more physical, physiological, mental, economic, cultural, or social identity of the Customer - and any conclusion related to the Customer drawn from the data;
<b>Contribution</b>	A voluntary and firm declaration of the data subject's intention, based on adequate information, giving his or her unambiguous consent to the processing of personal data concerning him or her, in whole or in part;
<b>Protest</b>	A statement by the data subject objecting to the processing of his or her personal data and requesting the termination of the data processing or the deletion of the processed data;
<b>Data controller</b>	A natural or legal person, or an organization without legal personality, which either alone or jointly with others determines the purpose of the processing of data, makes and implements decisions on the processing of data (including the means used) or implements it with the processor;
<b>Data management</b>	Irrespective of the procedure used, any operation or set of operations on data, in particular the collection, recording, recording, systematisation, storage, alteration, use, consultation, transmission, disclosure,

	coordination or interconnection, blocking, erasure and destruction of data, and prevent its further use, take photographs, sound or images and record physical features capable of identifying a person (eg fingerprint or palm print, DNA sample, iris image);
<b>Data transmission</b>	Making the data available to a specific third party;
<b>Disclosure</b>	Making data available to anyone;
<b>Adattörlés</b>	Making the data unrecognizable in such a way that it is no longer possible to recover it;
<b>Data erasure</b>	Performing technical tasks related to data management operations, regardless of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;
<b>Data processor</b>	A natural or legal person or an organization without legal personality who, under a contract, including a contract concluded under the law, processes data;
<b>Data file</b>	The set of data managed in one record;
<b>Third person</b>	A natural or legal person or an organization without legal personality who is not the same as the data subject, the controller or the processor;
<b>EEA State</b>	A Member State of the European Union and another State party to the Agreement on the European Economic Area and a State of which a State party to the Agreement on the European Economic Area is a national under an international agreement concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area enjoys the same legal status as a national of a State;
<b>Third country</b>	Any non-EEA state;
<b>Privacy Incident</b>	Unlawful handling or processing of personal data, in particular unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction and damage.

## 2. PROCESSED PERSONAL INFORMATION

The personal data of customers / business partners managed and stored at our company is described in Chapter 4 for each data management.

Company data related to a sales or supplier contract or the performance of a contract or other business documents and records do not constitute personal data.

Patient data on the data carriers of the products returned to our company (including the ECG measurement itself, the accelerometer data of the mobile device, the average heart rate in which part of the human body the ECG was recorded, local time, time zone and geographical location, etc.) are not handled and does not store.

### 3. SCOPE OF DATA PROCESSING

The individuals involved in each of the data processing listed in Chapter 4 are responsible officials or employees of organizations that use Labtech's services or provide a service / product to Labtech.

We only process the personal data of individuals who have not objected to individual data processing and have made their personal data available to us in accordance with their free will. If the legal basis of the data management is "Consent for one or more purposes", Labtech Ltd. ensures the detailed information of the data subjects through this clear prospectus and the acquisition of the consent rights declarations.

Labtech Ltd., as a data controller, handles the processed data only for the purpose specified in the table according to Chapter 4, for a fixed period of time and does not make it available to third parties other than the described data processors.

By transferring the personal data to Labtech Ltd., you guarantee the correctness and accuracy of the data.

If the data is provided to Labtech not by the natural person but by his / her employer, Labtech shall not be liable for obtaining the natural person's consent to the data transfer.

Labtech Ltd. excludes its liability in case of false or erroneous data provided by data sources.

### 4. Data managements

Aim of data management	Legal basis	Consequence of failure to provide data	Managed data	Duration of storage
Tender	Necessary for the performance of a contract where the party concerned is one of the parties or initiates the conclusion of the contract	There is no product sales or service support	The contact person <ul style="list-style-type: none"> <li>- name;</li> <li>- e-mail address*;</li> <li>- telephone number</li> </ul>	5 years from the date of the offer: Data processor: MULTI HARDWARE Ltd.
Framework sales contract / exclusivity or supplier agreement with a company			Responsible officer and contact person <ul style="list-style-type: none"> <li>- name;</li> <li>- position</li> <li>- e-mail address*;</li> <li>- telephone number</li> </ul>	8 years from the last invoice was issued: Data processor: MULTI HARDWARE Ltd.
Customer service relationship			The contact person <ul style="list-style-type: none"> <li>- name;</li> <li>- position;</li> <li>- e-mail address*;</li> <li>- telephone number</li> </ul>	
Order fulfillment,			The contact person	

Aim of data management	Legal basis	Consequence of failure to provide data	Managed data	Duration of storage
delivery Service and repair			<ul style="list-style-type: none"> <li>– name;</li> <li>– position</li> <li>– e-mail address*;</li> <li>– telephone number;</li> </ul> billing and delivery address**	
Issuance of an invoice to a company	Needed by the data controller to fulfil its legal obligation	The content requirements of the invoice are not met, and an official condemnation is made	The contact person <ul style="list-style-type: none"> <li>– name;</li> <li>– position;</li> <li>– e-mail address*;</li> <li>– telephone number</li> </ul>	Storage period according to the Accounting Act (8 years) Data processor: Audit-Labtech Könyvelőiroda Ltd. MULTI HARDWARE Ltd.
Issuance of invoices to a private individual or sole proprietor			name; tax identification number (individual); tax number (entrepreneur); billing and shipping address **; e-mail address*; phone number	
Corporate correspondence Consultant Alerts	Contributing to One or More Purposes	Effective, up-to-date information services are not possible	The contact person <ul style="list-style-type: none"> <li>– name;</li> <li>– position;</li> <li>– e-mail address*;</li> <li>– telephone number</li> </ul>	Until your consent is revoked or your partner's email address expires Data processor: MULTI HARDWARE Ltd.
Downloadable documents and softwares from <a href="http://www.labtech.hu/">http://www.labtech.hu/</a>				
Information with newsletters about the operation, availability and products of Labtech Ltd.			Until your consent is revoked or your partner's email address expires Data processor: The Rocket Science Group, LLC	
Sales after the request for	Execution of the contract,	The data controller	Name, e-mail address,	Invoices must be kept for 8

Aim of data management	Legal basis	Consequence of failure to provide data	Managed data	Duration of storage
quotation via the website	legal obligation	cannot fulfill the order.	phone, Delivery Address, billing address	years pursuant to Section 169 (2) of Act C of 2000 on Accounting, 7.4. in case of enforcement of claims arising from the contract, Act V of 2013 on the Civil Code 6:21. § 5 years.

\* In the case of corporate correspondence, personal data will only be processed if the e-mail address contains a personal name

\*\* In case of use of a private address by a private entrepreneur or individual

## 5. Duration of data management

Data shall be processed only to the extent necessary for the purpose, for the time and only with the personal data that are strictly necessary it and otherwise suitable for the purpose, in particular as long as your rights and administration obligations exist.

In determining the storage period of personal data, the following have been taken into account:

- a) the limitation period for claims arising from the contractual relationship between you and Labtech Ltd., and
- b) the limitation period of claims related to the legal obligations of Labtech Ltd. under the Contract with the longer duration.

The storage time for each data is described in the table in Chapter 4.

If a data occurs in more than one data management, the longer period according to the table shall prevail in determining the storage time for the data. Of course, the data stored in this way can only be used for data processing that is still in force.

## 6. Data processing

Recipients of personal data within Labtech Ltd.:

- The top management of the company
- Employees of the commercial department
- Employees of the testing and support department
- Employees of the service department
- Employees of the quality assurance department

Labtech Ltd. uses the following data processors for its data management activities:

Data processor	Aim	Contact
Audit-Labtech Accounting Office Ltd.	Accounting activities	4025 Debrecen, Bem tér 14. I/4. Tax-number: 14138610209 Contact person: Monori Andrea Tel: +36 52 522 090
MULTI HARDWARE Ltd.	IT system administrator	4031 Debrecen, Határ út 2. Tax-number: 12637058209 Contact person: Puskás Ferenc 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 for accessing data

Employees, senior executives, consultants, data processing or other employees of Labtech Ltd.

## 8. Transmission of data

We recognize that your data is valuable and will do our best to protect it in our data processing.

In certain cases, we will share the personal data you provide with us with third parties who cooperate with us or act on our behalf, if this is necessary to achieve the purpose for which the data subject or you provided the data. Labtech Ltd. may also transfer personal data to other third parties if this serves the more efficient service of you, or if the said third parties process the affected data on behalf of Labtech Ltd. however, we have made sure that these third parties protect the information and data properly.

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

We will only share information with other third parties if:

- we have the consent of the data subject;
- it is required of us by law; obsession
- necessary for the purpose of legal proceedings, in connection with them or for the exercise or protection of rights guaranteed by law.

As soon as the conditions for the lawful handling or transfer of the data cease, Labtech Ltd. Will immediately take action to delete the personal data from the database and send you a notification about the fact of the deletion.

## 9. Data security

During the data management, Labtech Ltd. became aware of the data stored both in the electronic information system and on the traditional paper-based data carriers with the utmost care, strictly confidentiality and seeks to protect them by all legal means, especially unauthorized access, alteration, transmission, disclosure, other misuse, erasure or destruction, and technical and organizational measures against accidental destruction and damage.

The IT system of Labtech Ltd. provides adequate security for the management of data in an electronic information system. Like Labtech Ltd., our data controllers and partners ensure the protection of data and use it strictly for a specific purpose. The data processed is accessible to those authorized to do so, the authenticity and authentication of the data is ensured, the data is unchanged, and the data is protected against unauthorized access.

Labtech Ltd. protects the data in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage. Labtech Ltd. ensures the security of the data with technical, organizational and organizational measures that provide a level of protection appropriate to the risks arising in connection with data management. We have put in place generally accepted technological

and operational security solutions to prevent the loss, alteration, destruction or misuse of identifiable personal information. To the greatest extent possible, we ensure the protection of personal data managed by Labtech Ltd. through appropriate confidentiality obligations and technical and security measures. Personal data can only be accessed by our duly authorized employees and data controllers who are authorized to do so.

## 10. Newsletter

You can consent to Labtech Ltd. sending professional materials and other information and notifications related to Labtech Ltd. to the given email address in the form of a newsletter. Subscription is voluntary and can be canceled at any time via the link or reply email provided in the newsletter.

Labtech Ltd. creates a database from the data of the persons who provide their company contact details as contact persons (company name, name, position, company email address (if they cannot be linked to a natural person). In addition, in the opinion of Labtech Ltd., it regularly sends newsletters on topics that may be of interest to it.

Through the newsletter sending service, it draws the attention of the organizations represented by the contact persons to the current rules related to the activities of Labtech Ltd. and their changes and provides guidance on the practical application of each rule. It offers the opportunity to participate in (online) events held through the

device, as well as the direct contact details of its employees in connection with the topics.

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

Labtech Ltd. handles the data until the data subjects request their deletion.

## 11. Cookies

When you use our services or open our emails, we may collect certain information in an automated manner, such as cookies, web beacons, and web server logs. The information collected in this way includes your IP address, browser characteristics, device characteristics, operating system version, language preferences, referring URLs, information about steps taken on our services, and when you visit the website. This information does not identify you. If you continue to use our services, we will assume that you enable this collection. If you wish to use the Services without cookies, you can log in at <http://www.labtech.hu/aboutus/privacy>. Please note, however, that without cookies you may not be able to use all the features of our services.

We use cookies, web beacons, web server logs and other automated tools for purposes such as (i) customizing user visits on websites, (ii) user-tailored content and user browsing of websites (iii) other aspects of our websites and business treatments.

We may use third-party web analytics services to run our Services, such as Google Analytics. Service providers and analytics providers use technologies such as cookies, web server logs, and web beacons that collect usage information based on your IP address, but not your

personal information, to help visitors analyze your Web sites. use. Analytical service providers may from time to time collect information about the use of other websites if those websites also use the same analytics service providers. To learn more about Google Analytics and how to quit, visit <http://www.google.com/analytics/learn/privacy.html>.

We may use third-party services in the operation of our Services to collect usage data in order to understand our users and to continually improve our products and services.

## 12. Customer rights

### 1. The right of access

You are entitled to receive feedback from the data controller about whether your personal data is being processed and, if such processing is in progress, you have the right to have access to your personal information and the information listed in the decree.

### 2. The right of rectification

You are entitled to request the data controller to rectify any inaccurate personal information that he or she is required to do without undue delay. Taking into account the



purpose of data management, you are entitled to request the supplementation of incomplete personal data, including by means of a supplementary statement.

### 3. The right to cancel

You are entitled to request that the data controller, without undue delay, disclose personal information about you, and that the data controller is obliged to delete personal information about you, without undue delay, under certain conditions.

### 4. The right to be forgiven

If the data controller has disclosed the personal data and is required to cancel it, taking reasonable steps, including technical measures, to take into account the cost of available technology and implementation, in order to inform the data controllers handling the data that you have applied for the personal data in question pointing links or deleting a duplicate or duplicate of these personal data.

### 5. The right to restrict data management

You are entitled to request that your data controller restricts your data handling if one of the following conditions is met:

- You dispute the accuracy of your personal data; in this case, the restriction applies to the period of time that the data controller can check the accuracy of personal data;
- Data handling is illegal, and you are opposed to the deletion of data and instead asks you to restrict them;
- The data controller no longer needs personal data for data processing, but you require them to submit, enforce, or protect legal claims;
- You have objected to data manipulation; in this case, the restriction applies to the period when it is established that the legitimate reasons for the data controller have priority over your legitimate reasons.

### 6. The right to data storage

You are entitled to receive personal data that is made available to you by a data controller in a fragmented, widely used machine-readable format and is entitled to transfer this data to another data controller without this being obstructed by the data controller whose provided personal information to you (...)

### 7. The right to protest

You are entitled to object to the handling of your personal information (...), including profiling based on these provisions, for any reason relating to your own situation.

### 8. Protest in case of direct business acquisition

If your personal data is handled for direct business, you are entitled to protest at any time against the handling of personal data relating to it, including profiling, if it is related to direct business acquisition. If you object to personal data being handled for direct business purposes, your personal information can no longer be handled for that purpose.

## 9. Automated decision-making in individual cases, including profiling

You are entitled to exclude the scope of any decision based solely on automated data handling, including profiling, which would have a bearing on it or affect it significantly.

The preceding paragraph shall not apply if the decision is:

- You are required to conclude or complete a contract between you and the data controller;
- the granting of the right to a data controller is subject to the law of the Union or of the Member States which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- it is based on your explicit consent.

## 13. Deadline for action

The data controller informs you of any measures taken in response to these requests without undue delay but in any way **within 1 month** of receipt of the request.

If necessary, it may be **extended by 2 months**. The controller will inform you about the extension of the deadline by indicating the cause of the delay **within 1 month** of receipt of the request.

If the data controller fails to take action upon your request, he or she will notify you **without delay and at the latest within one month of the receipt of the request** for reasons of non-action and whether you may file a complaint with a supervisory authority and exercise its right of appeal.

## 14. Informing the person concerned about the privacy incident

If the privacy incident is likely to pose a high risk to the rights and freedoms of natural persons, the data controller shall inform the data subject of the privacy incident without undue delay.

Information given to the data subject should be **clearly and easily understood** and the nature of the privacy incident must be disclosed and the name and contact details of the Data Protection Officer or other contact person providing additional information should be disclosed; the likely consequences of a data protection incident should be described; describe measures taken or planned by the data controller to remedy a data protection incident, including, where appropriate, measures to mitigate any adverse consequences of a data protection incident.

The person concerned shall not be informed if any of the following conditions are met:

- the data controller **has implemented appropriate technical and organizational protection measures** and applied these measures to the data covered by the data protection incident, in particular the measures, such as the use of encryption,

which make it impossible for persons who are unauthorized to access personal data the data;

- after the data protection incident, the data controller has taken further measures to **ensure that high risk for the rights and freedoms of the person concerned is no longer likely to be realized**;
- Informing **would require disproportionate efforts**. In such cases, the data subject shall be informed by means of publicly disclosed information or a similar measure shall be taken to ensure that such information is equally effective.

If the data controller has not yet notified the data subject of the data protection incident, the supervisory authority may, after considering whether the privacy incident is likely to pose a high risk, may inform the data subject.

## 15. Report a data protection incident to the authority

The data protection incident shall be reported by the controller to the supervisory authority competent under Article 55 without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is not likely

to jeopardize the rights of individuals and its freedom. If the notification is not made within 72 hours, the reasons for the delay must be provided.

## 16. Review in case of mandatory data management

If the duration of the mandatory data processing or the periodic review of the need for it is not specified by law, a local government decree or a mandatory legal act of the European Union, **the data controller shall review at least every three years** whether the data controller whether the processing of personal data is **necessary** for the purpose of data processing.

The circumstances and results of this review shall **be documented by the controller, which shall keep this documentation for ten years after the review** and shall make it available to the Authority upon request of the National Data Protection and Freedom of Information Authority (hereinafter: the Authority).

## 17. Possibility for complain

Complaints against possible breaches of the data controller can be lodged with the National Data Protection and Freedom of Information Authority:

### **National Data Protection and Freedom of Information Authority**

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Postafiók: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## 18. Other informations

Labtech Ltd. reserves the right to unilaterally amend this data protection information at any time. We will clearly inform you in writing of any changes in the information at one of the contact details provided in the contract.

If you have any questions or comments, feel free to contact Labtech Ltd. at one of the following contacts.

- Telephone: +36-52-500-128
- e-mail: [medical@labtech.hu](mailto:medical@labtech.hu)
- Address: 4031 Debrecen, Vág út 4.
- Mailing address: 4031 Debrecen, Vág út 4.

## 19. The following regulations were accounted in the course of composing the guide:

- REGULATION (EEC) No 2016/67 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (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 Regulation (EC) No 95/46
- 2011 CXII. Law on information self-determination and freedom of information (hereinafter: Infotv.)
- Act CVIII of 2001 - Act on Electronic Commerce and Information Society Services (especially Section 13 / A)
- Act XLVII of 2008 - Act on the Prohibition of Unfair Commercial Practices against Consumers;
- Act XLVIII. Of 2008 - the basic conditions and certain limitations of economic advertising activity (in particular Article 6)
- XC. Law of 2005 on Eletronic Freedom of Information
- Act C of 2003 on Electronic Communications (specifically Article 155)
- No. 16/2011. an opinion on the EASA / IAB Recommendation on Best Practice in Behavioral Online Advertising
- Recommendation of the National Data Protection and Information Authority on the data protection requirements for prior information

Debrecen, 13 August 2020