

Privacy Notice

1. Introduction

This Privacy Notice is intended to describe the practices ONLINET Group Zrt. follows in relation to its Customer Relationship Management systems (CRM systems) with respect to the privacy of all individuals whose personal data is processed and stored in the CRM systems for direct marketing purposes.

2. Who manages ONLINET's CRM systems?

"ONLINET is a separate legal entity. The CRM system is managed by ONLINET Group Zrt. registered office: 161.Budaörsi road, Budapest 1112, Hungary registered number: 01-10-046361).

3. Why do we need your information?

The CRM systems are ONLINETs client/contact relationship management tools that support the marketing operations of ONLINET. Clients and contacts in the CRM systems may be sent ONLINET thought leadership, marketing materials, learning opportunities, surveys and invitations to events.

Personal data processed in the CRM systems is used for the purposes of sales and marketing. Processing your contact information allows us to communicate with you via electronic mailings, text messages, in hard copy form or from time to time if necessary also via phone.

ONLINET relies on the following basis to legitimize the processing of personal data in its CRM systems:

- The company has obtained individual's consent for the processing of personal data in the CRM systems; or
- The company has a legitimate interest to process personal data in the CRM systems, which legitimate interest is the processing of personal data for direct marketing purposes.

4. What type of personal data is processed in the CRM systems?

The CRM systems process personal data of former, current and prospective clients (including individuals within a corporate client) of ONLINET The CRM systems also contain data of other business contacts (such as consultants, regulators, journalists) as well as alumni.

The following data categories are processed in the CRM systems:

Name, job title, address, email address, phone numbers, fax number

Marketing preferences

Invitation responses and event attendance confirmations

5. Sensitive Personal Data

Sensitive personal data reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation.

ONLINET does not intentionally collect any sensitive personal data from you to store in its CRM systems. The CRM systems' intention is not to process such data unless you explicitly provide sensitive personal data to us (for example dietary requirements if you attend one of our events).

6. Who can access your information?

Access to your personal data is limited by need. All marketing, sales, administrator have access to your contact information.

We will only disclose your personal data to third parties:

- If such third party is engaged by ONLINET to facilitate, maintain or support its CRM systems and providing data for marketing activities (for example, to provide information technology and other administrative support services to operate the CRM systems);
- When explicitly requested by you;
- As required by a court order or any other legal or regulatory requirement.

7. International transfer of data

ONLINET has a comprehensive global privacy compliance program that includes EU-approved Binding Corporate Rules. ONLINET will only disclose your personal data to third parties that provide an adequate level of privacy protection.

8. Data retention

Data of contacts who have been out of active use for 18 months will be deleted from our CRM systems. If you want to have your data deleted from our CRM systems or if you wish to object to the processing of your personal data for direct marketing purposes, please email us via contact@onlinetgroup.com

9. Security

ONLINET is committed to making sure your personal data is secure. To prevent unauthorized access or disclosure, ONLINET has technical and organizational measures to safeguard and secure your personal data. All ONLINET personnel and third parties ONLINET engages to process your personal data are obliged to respect your data's confidentiality.

10. Controlling your personal data

ONLINET will not transfer your personal data to third parties (other than any external parties referred to in section 6 above) unless we have your permission or are required by law to do so.

You are legally entitled to request details of ONLINET's personal data about you.

To confirm whether your personal data is processed in our CRM systems or to access your personal data in the CRM systems, contact your usual ONLINET representative or email your request to contact@onlinetgroup.com.

11. Rectification, erasure, restriction of processing or data portability

In order to confirm that your personal data is accurate and current or to request rectification, erasure, restriction of processing or a readily portable copy of your personal data, you can contact your usual ONLINET representative or by sending an e-mail to contact@onlinetgroup.com.

12. Complaints

If you are concerned about an alleged breach of privacy law or any other regulation, contact with ONLINET privacy officer who will investigate your complaint and provide information about how it will be handled.

If you are not satisfied with how ONLINET resolved your complaint, you have the right to complain to your country's data protection authority. You can also refer the matter to a court of competent jurisdiction.

13. Cookies

Our Site uses cookies, to improve Our Site's performance and to enhance your browsing experience. Certain areas of Our Site also use cookies to understand more about you, so we can offer you a more personalized browsing experience.

What is a cookie?

A "cookie" is technology that allows Our Site to store tokens of information (an 'identifier') in your browser used only by Our Site while you are on Our Site. Cookies are not used to determine the personal identity of anyone who is merely visiting Our Site. They serve to help us track traffic patterns to determine a user's preferred location and language so that we can direct them to the correct country home page when they visit Our Site.

Cookies have other uses as well. For example, in the Thought Center Webcast section ("Webcast Section"), they are used to provide entry for subscribers who have chosen the automatic log-on

feature during registration. Cookies are also used to prevent online poll participants from voting more than once.

On certain pages of Our Site, cookies are used to help us track your interests while you browse the internet, so we can tailor more relevant advertising to you, and to understand what is important to you.

How do I disable cookies?

If you do not want to receive a cookie from Our Site or the Webcast Section, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of Our Sites. For example, you will not be able to benefit from automatic log-on and other personalization features of the Webcast Section.

What cookies do we use?

The cookies used by Our Site perform four functions, as classified below:

Essential/Strictly Necessary Cookies

Some cookies we use are essential to the functioning of Our Site. For example, remembering your log-in details to certain parts of Our Site.

Performance Cookies

Some cookies help us with the performance and design of Our Site. This allows us to measure how many times a page has been visited, whether a page has been visited on Our Site through an advertisement or by other means.

Functionality Cookies

Some cookies help us to remember your settings which you may have selected, or assist with other functionality when you browse and use Our Site. This helps us to remember what you have selected, so on your return visit we remember your preferences.

Targeting and Tracking Cookies

On certain pages of Our Site, we use cookies to help us understand your interests as you browse the internet, so we can tailor and deliver to you a more personalised service in the future. This assists us in delivering relevant advertising to you during various advertising campaigns we may run from time to time through participating third party sites.

These cookies collect information relating to the origin of your visit, where you were exposed to ONLINET advertising, what advertising feature you saw, whether you arrived directly or indirectly to Our Site, the device you used to visit Our Site and which downloads you performed. This information is collected on an anonymous basis via third party suppliers.

In addition, we also utilize cookies on certain pages of Our Site to communicate with third party data suppliers in order to extrapolate your digital behaviour. This help us to understand and target more relevant advertising in the future. The information we receive is all aggregate and anonymous, but will include statistics such as demographics, online behaviour, product interests and lifestyle. Targeting and tracking cookies are provided via trusted third party suppliers. Should you require more information regarding our suppliers and how these cookies operate please contact us.

14. Contact us

If you have additional questions or concerns, contact your usual ONLINET representative or email contact@onlinetgroup.com.