

## **Privacy Policy**

### **How we handle your data**

This privacy policy (the "Privacy Policy") is applicable to the balasys.hu website and any other websites owned and operated by Balasys IT Ltd. ("Balasys"), H-1117, Budapest, Alíz str 4. 1. floor, and its subsidiaries or affiliates ("This Website," "We", "our" or "us"). This policy does not apply to the websites of our customers or Business Partners or to the websites of any other third parties, even if links to their websites are on our website. We recommend that you review the privacy policies of the other parties with which you interact.

This Privacy Policy governs information we collect from you when you use any of our products or This Website. This Policy also outlines our specific practices with regard to collection, use, processing, transfer and/or storage Personal Data (as defined below) in connection with your purchase, access and use of our software applications.

For purposes of this privacy policy, "Business Partners" are subcontractors, vendors or other entities with whom we have ongoing business relationships to provide products, services or information, as well as our distributors and resellers. "Affiliates" are legal entities that are owned by or under common ownership with Balasys. "Personal Data" means information that can directly or indirectly identify you as an individual, such as your name, telephone number, address, billing information and email address or other similar information.

We may also seek your explicit consent to process certain Personal Data collected on This Website or volunteered by you. Kindly note that any consent will be voluntary. In case you do not grant the requested consent to the processing of your Personal Data or if you later inform Balasys (in accordance with the "Contact Us" section below) that you do not want Balasys to further process your Personal Data, the (further) use of certain offerings or services of Balasys may be either not possible or limited in scope.

### **When do we collect Personal Data?**

- Use This Website
- Download a software trial or update
- Contact us, including for sales or technical support
- Request information about our products, quotes, downloads or white papers;

### **Personal data we collect**

Personal Data we request may include your email address, name, home address, billing information and telephone number. We may also collect demographic information, such as your business or company information, age, gender, interests, preferences, and geographic location. Forms that you choose to complete will indicate whether information requested is mandatory or voluntary.

We may collect information about your visits to This Website, including the pages you view, the links

and advertisements you click, search terms you enter, and other actions you take in connection with This Website. We may also collect certain information when you visit This Website or third-party websites, such as your Internet Protocol (IP) address, browser type and language, access times, the Uniform Resource Locator (URL) of the website that referred you to our website and to which URL you browse away from our sites if you click on a link on our sites. We may also collect information when you open email messages from us or click on links within those email messages.

We may combine the information we collect as a result of your interactions with us with information obtained through other sources within our affiliated and subsidiary companies for various reasons including to offer you a more consistent and personalized experience in your interactions with us. We may also supplement the information we collect with information obtained from other sources.

### **How we use personal data**

- Deliver the products and support or carry out the transactions you have requested
- Establish a unique account for you to access our software
- For accounting and billing purposes
- Send communications to you, such as your transaction status (for example, order confirmations), information about products and services available from our portfolio and from our affiliated and subsidiary companies, event announcements, important product notices including those announcing changes to our terms or policies, information about particular programs in which you have chosen to participate, surveys, promotional offers and other related communications
- For other uses that may be necessary or useful in order for us to provide the services you have purchased
- Advertise and market our software product lines by delivering targeted advertisements on This Website and other sites;
- Administer, customize, personalize, analyze and improve our products, services (including the content and advertisements on This Website), technologies, communications and relationship with you;
- Enforce our conditions of sale, website terms and/or separate contracts (if applicable) with you
- Prevent fraud and other prohibited or illegal activities
- Protect the security or integrity of This Website, our business, or our products or services; or otherwise, as disclosed to you at the point of collection or as required or permitted by law.

### **Transfers of Personal Data**

Personal Data we collect may be stored and processed in Hungary or any other country in which the entities represented by our affiliated and subsidiary companies or Business Partners maintain facilities. We ensure that such storage and processing is subject to appropriate levels of protection to safeguard your Personal Data. Further, Balasys ensures that for any transfer of Personal Data to a country outside the EU/EEA it has adequate safeguards in place for the transfer of personal data to third countries. These safeguards may include agreements incorporating the EU standard contractual clauses.

### **Breach Notification**

Balasy's takes its responsibility for managing security and compliance very seriously and has established policies, processes and controls designed to ensure the protection of your Personal Data, including a variety of security strategies intended to prevent unauthorized access to your Personal Data. Balasy's evaluates and responds to reports of incidents that might involve unauthorized access to Personal Data. If we become aware that Personal Data has been compromised or mishandled, we report any such action or activity to you in accordance with prevailing legal and/or contractual requirements.

### **Recipients of Personal Data**

We may share Personal Data with our affiliated and subsidiary companies or Business Partners to carry out transactions you request, to make our business more responsive to your needs, to provide you with information about our products and services, or for research and analysis. We may also disclose Personal Data in connection with legal orders from law enforcement or other government bodies; as required by law or regulation; to protect our rights as well as those of our affiliated and subsidiary companies, our customers, the public, or others; to combat fraud or criminal activity; or with your consent.

In addition, we may share Personal Data with Business Partners that help us or our affiliated and subsidiary companies to carry out transactions you request, or to customize, analyze and/or improve our communications or business relationship with you. Such Business Partners may include a payment processor to bill you for services and an email service provider to send out emails on our behalf.

These communications may include requests relating to our products or services. We will only share Personal Data with Business Partners who share our commitment to protecting your Personal Data. Except as described above, we will not disclose Personal Data to third parties for their own marketing purposes unless you have provided consent. We may share information with a purchaser of Balasy's or all or some of the companies or products comprising our business group, including our affiliated and subsidiary companies.

We may aggregate or de-identify information so that it does not identify you and share that and other non-Personal Data with third parties for any purpose.

### **Selecting Your Communications Preferences and Opting Out of Marketing**

You may choose to receive or not receive marketing communications from us by indicating your preferences. If you would prefer not to receive future marketing communications or wish to change or modify information previously provided or delete inaccuracies, please contact us at [marketing@balasy.hu](mailto:marketing@balasy.hu). Upon receipt of your request, your information will be updated as soon as possible, but no later than ten (10) days after our receipt of your request.

We will respond to all requests for access to your Personal Data within 30 days. We will retain your Personal Data for as long as your account is active or as needed to provide you services and as necessary to comply with our legal, regulatory or compliance obligations. Even if you opt out of receiving marketing communications, we may still communicate with you in connection with servicing your account, fulfilling your request, or administering any promotion or any program in which you may have elected to participate.

## **Collection and Use of Children's Personal Data**

We take children's privacy seriously. We do not knowingly collect Personal Data from children under the age of 13 through This Website. If you are under 13 years of age, please do not submit any Personal Data through This Website without the express consent and participation of a parent or guardian.

## **How We Use Cookies**

This Website uses "cookies" to enable you to sign in to our services and to help personalize your online experience. A cookie is a piece of text that is placed on your computer's hard drive. Depending on the settings you have selected, your browser adds the text to your device as a small file. You can change the browser settings as described below; many browsers are set to accept cookies by default. We use cookies to store your preferences and other information on your computer in order to save you time by eliminating the need to enter the same information repeatedly.

You have the ability to accept or decline cookies. Many web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to sign in or use other interactive features of This Website and services that depend on cookies. The Help portion of your web browser, most likely found on the toolbar, typically tells you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

## **Targeted Display Advertising**

We also work with advertising and personalization Business Partners that use cookies to help us display personalized content and appropriate advertising during your visits to This Website and other websites. Cookies placed by these Business Partners also assist us with measuring the performance of our advertising campaigns. For more information regarding the privacy and data collection practices of third parties that use cookies for advertising from This Website, including information on how to opt out of such cookies please use the following links.

**Facebook:** Information regarding the privacy and data collection practices for Facebook is located at <https://www.facebook.com/policy.php>.

**LinkedIn:** Information regarding the privacy and data collection practices for Facebook is located at <https://www.linkedin.com/legal/privacy-policy>

**Google & DoubleClick:** Information regarding the privacy and data collection practices for DoubleClick (offered by Google) is located at <http://www.google.com/privacy/privacy-policy.html>.

Similarly, third parties use cookies to deliver advertising for companies other than those within our portfolio to you on the Internet, based on your visits to This Website and other websites, and to measure the effectiveness of those advertising campaigns. These cookies can be effective whether you are on This Website or another website. These cookies assist the third parties in identifying the pages you view, the links and ads you click on, other actions you take on those web pages, and the website from which you came before arriving at a web page.

## “Do Not Track” Signals

Please note that while you may have the opportunity to opt out of targeted advertising through links on the advertisements themselves and you may be able to control the use of cookies through your web browser as described in the “How We Use Cookies” section above, some web browsers also may give you the ability to enable a “do not track” setting. This setting sends a special signal to the websites you encounter while web browsing. This “do not track” signal is different from disabling certain forms of tracking by declining cookies in your browser settings, as browsers with the “do not track” setting enabled still have the ability to accept cookies. Our system does not respond to web browser “do not track” signals at this time. If we do so in the future, we will describe how we do so in this Privacy Policy. For more information about “do not track,” visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

## Targeted Email Marketing

Some marketing you receive, including email marketing, may also be personalized based on your visits to This Website and your browsing and purchase history. In addition, when you click on some links in email marketing you receive, our email service provider may place a cookie on your browser. This cookie would be linked to your email address and used to gather information about the products and services you view on This Website. Information gathered may be used to personalize and customize future email marketing messages you receive. You may opt out of this use by clicking on the unsubscribe link provided in every personalized email marketing message you receive sent from or on behalf of us.

## How We Use Web Beacons

We, or our Business Partners, may use web beacons on This Website, in our email messages, in our advertisements on other websites, or in our advertisements in others' email messages. Similarly, third parties whose content or advertisements appear on This Website may also place web beacons in their ads or emails for purposes of measuring the effectiveness of the content, advertisements or email messages.

A web beacon is an electronic image that can be used to recognize a cookie on your computer when you view a web page or email message. Web beacons help us measure the effectiveness of This Website and our advertising in various ways. For example, web beacons may count the number of individuals who visit This Website from a particular advertisement or who make a purchase from This Website after viewing a particular advertisement or they may tell us when a web page is viewed and provide a description of the page where the web beacon is placed.

Web beacons may also measure the effectiveness of our email campaigns, by counting the number of individuals who open or act upon an email message, determining when an email message is opened and determining how many times an email message is forwarded.

The information we collect through web beacons may include some limited Personal Data, and web beacons allow us to recognize users by accessing our cookies. We may also combine the information that we collect through web beacons with other information we have collected from you. We use all of this information to better tailor our marketing to you and may use this information for other purposes, such as to enable a shopping cart, customize content on This Website and undertake internal research.

We prohibit web beacons on This Website from being used by third parties to access Personal Data. We may allow Business Partners to compile individual information or aggregated statistics from the use of web beacons on This Website to determine the effectiveness of online marketing and to develop statistics on how often clicking on an advertisement results in a purchase or other action on the advertiser's site. Aggregate information is anonymous and may include demographic and usage information. No Personal Data about you is shared with Business Partners for this research.

You can make some web beacons unusable by rejecting cookies in your web browser.

### **How We Secure Personal Data**

We are committed to protecting the security of Personal Data. We use a variety of security technologies and procedures to help protect Personal Data from unauthorized access, use and disclosure.

While we strive to protect your Personal Data, we cannot ensure or guarantee that the Personal Data or private communications you transmit to us will always remain confidential, and you do so at your own risk. If you have any questions regarding security, you can contact us at [marketing@balasys.hu](mailto:marketing@balasys.hu). When we use your Personal Data in connection with a product or service, the data will most often be encrypted both in transit and at rest.

When we do engage third party providers for various services, including cloud hosting services for certain aspects of our offerings, we rely on the public policies and protections of those globally available services for the protections we apply to your Personal Data.

### **Social Media Features**

This Website includes social media features, including Facebook "Like" button and Twitter "Follow" button. These features may collect your IP address, which page you are visiting on This Website, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on This Website. Your interactions with these features are governed by the privacy policy of the company providing it.

#### **Public forums**

This Website offers publicly-accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your Personal Data from our blog or community forum, contact us at [marketing@balasys.hu](mailto:marketing@balasys.hu). In some cases, we may not be able to remove your Personal Data, in which case we will let you know if we are unable to do so and why.

#### **Links to Third-Party Websites and Services**

This Website may contain links to third-party sites. We cannot control and are not responsible for the privacy practices of such third-party sites. We encourage users to be aware when they leave This Website, and to read the privacy policies of each website they visit. This Privacy Policy applies only to This Website.

### **Effective Date and Notification of Changes to our Privacy policy**

This Privacy Policy is effective as of May 1, 2018. We reserve the right to change this Privacy policy at any time. If we materially change this Privacy Policy, we will either notify you by email (sent to the e-mail address specified in your account) or post a prominent notice on This Website. Changes are effective as of the date we post them on the Privacy Policy page of This Website. We encourage you to periodically review this Privacy Policy.

### **Contact us**

If you have questions or concerns regarding this Privacy policy, please contact us at [marketing@balasys.hu](mailto:marketing@balasys.hu) or via postal mail at H-1117, Budapest, Alíz str. 4. 1. floor. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us at [marketing@balasys.hu](mailto:marketing@balasys.hu). If you would like to request to view, edit or delete your private information, or if you have a complaint or concern about a violation of your privacy rights, contact us at [marketing@balasys.hu](mailto:marketing@balasys.hu). We will retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and for other necessary business purposes.