



**[ A SERIOUS BOARDGAME FOR ORGANIZATIONS ]**  
to increase productivity and strengthen cooperation

## **Notice on Data Processing**

Validity: from 1 September 2019

### **Controller:**

Diffusion Bt.

Represented by Nándor BOGNÁR

Address: 1024 Budapest, Margit krt. 29/A

Company registration number: 01-06-111682 (Company Court of the Metropolitan Court of Budapest)

E-mail: nbognar@t-online.hu

### **Purpose and legal basis of data processing:**

*Target scope of data and legal basis - GDPR reference*

### **A) Contact data**

Based on consent:

- providing access to the service, providing clients with service-related information, the clients' registration data, and IP addresses required for using the service,
- offering options for purchase to parties making inquiries or expressing their intent to purchase.

For fulfilling an order or performing a contract:

- contact and purchase information for parties subscribing to purchase,
- invoicing data in the event of sale,

Article 6(1)(b) - performance of a contract concluded with the data subject, or on the basis of the data subject's express voluntary consent.

## **B) Commercial data**

- name, first name, address, e-mail, phone number, invoicing data, delivery address, ordered quantity

Article 6(1)(c) - processing is necessary for compliance with a legal obligation (accounting and tax legislation)

## **C) Usage data**

- analysing the use of solutions
- opening, clicking and downloading data

Article 6(1)(f) - the legitimate interests pursued by the controller: quality assurance and product development

## **D) Promotional data**

Newsletter or offer sent not more than fortnightly, on average:

- name, first name, e-mail address, click information

Article 6(1)(a) - consent

Provision of data is necessary for promotional purposes, for the conclusion of a contract or for the provision of the service; the service cannot be provided in the absence of this data.

## **Data processing**

Period of data processing: in the case of data processed on a legal basis in order to fulfil a legal obligation, this shall be the period determined in the statutory regulation serving as the basis for the obligation. In the case of data processing related to the performance of a contract (including data processing based on a legitimate interest), the data will be stored after termination of the contract until the end of the general limitation period under civil law. Consent-based data processing will take place until the consent is revoked, but no later than until the end of the contractual data processing (whichever occurs first).

The legal basis for data processing based on legitimate interest is the data controller's legitimate interest to have information on the actual use of the service, in order to improve the quality of the service and develop further products.

## **Access to data**

The data subjects (clients) have the right to access the data concerning them, to request the rectification of any data stored incorrectly, or to withdraw the consent given (without prejudice to the lawfulness of the data processing prior to the withdrawal). Withdrawal of the consent can be made by the clients themselves, in their personal settings where they originally gave their consent. Furthermore, data subjects (clients) have the right to request erasure (or limited processing, without erasure) of the personal data relating to them, provided that the purpose of data processing has been fulfilled or its legal basis has ceased to exist. Clients also have the right to object to data processing.

## **Data processors**

During data processing, the following data processors (recipients) will have access to personal data provided by the clients:

Marabu Consulting Bt. (György MARTIN HAJDU) 1026 Budapest, Széplak utca 11. – professional and business partner in developing / conducting organisational and leadership development products and programs.

SalesAutopilot Kft. 1024 Budapest Margit körút 31-33. félemelet 4-5. - operator of the SalesAutopilot automated mailing and data management system.

Tamás MÁTÉ SP - 50732278, 1078 Budapest Nefelejcs utca 44. – professional performing the online programming.

## **Profiling**

During data processing, profiling is done to serve the clients' needs in a more and more tailor-made way, both online and offline, in the event of establishing further contacts.

Profiling enables us to

- access the basic information required for the quality assurance of our programs,
- obtain background information for professional and business communication.

## **Complaint management**

Data storage always takes place within the EU.

The above e-mail address may be used to file complaints or objections to the data controller or to initiate the exercising of any rights of the data subject.

The competent authority to which official complaints can be filed is:

National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/C [www.naih.hu](http://www.naih.hu))

## **Anonymous visitor identification applied in our services**

An anonymous visitor identifier ("cookie") is a unique series of signals suitable for identification and the storage of profile information, which web servers place on visitors' computers. Such a series of signals is not able to identify the visitor in any way whatsoever on its own, it is only suitable for recognising the visitor's computer. It does not contain any name, email address or any other personal information.

Cookies are sent to the visitor's browser not only from the Website, as an external, independent audit service (Google Analytics) also measures webpage traffic using these tools. For more details on processing measurement data, please visit the <http://www.google.com/intl/hu/analytics> website.

The Website contains remarketing tags used for building remarketing lists, which means that, once you visit the Website, third-party service providers, including Google, can show advertisements called 'interest-based ads' on various website. Remarketing lists are not suitable for personal identification, they do not contain the visitor's personal information, and are solely used to identify the browser software. Google uses cookies for remarketing tags. The Website uses conversion tracking to measure the effectiveness of Google AdWords ads. The conversion tracking cookie only exists for a limited time, it need not be accepted, and it does not record or use any personal information.

A visitor may disable Google's use of cookies in Google's Ads Preferences:

<http://www.google.com/settings/ads>. The unsubscribe page of Network Advertising Initiative ([http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)) provides options to block cookies from other external service providers as well. The Website provides access to Facebook's 'Like' buttons. These buttons also place cookies in the visitor's browser. For more details on Facebook's privacy guidelines, please visit the <http://www.facebook.com/about/privacy/> website. The Website uses Facebook's conversion-tracking pixel to measure the effectiveness of Facebook ads. During conversion tracking, the visitor's personal information is not recorded. Disabling Google and Facebook cookies does not affect the purchase.