PRIVACY POLICY

Thank you for visiting the website of the 'mideas' programme. Please read the following Privacy Policy, which will help you to use the service.

1. The data protection and data processing policy; the purpose of the data protection information

The purpose of the data protection information is the following:

to set out the data protection and data processing principles of Pannon Startup Üzletfejlesztési Alapítvány (Pannon Startup Business Development Foundation; registered office: 1118 Budapest, Kelenhegyi út 60/6, tax number: 18595825-1-43, hereinafter: the Foundation), which the Foundation accepts as binding; to ensure in all fields of the services we provide, for every individual regardless of their nationality or address, that their rights and fundamental freedoms (especially their right to privacy) are respected during the machine processing of their personal data (data protection); to ensure that before starting the data processing, the data subject is informed that the data processing is based on his consent or that it is obligatory (the legal basis for the data processing); to ensure that the data subject is provided clear and detailed information before the start of data processing of any and all facts relating to the processing of its data during the use of services, electronic data sheets, applications and functions on the websites of Pannon Startup Üzletfejlesztési Alapítvány ((www.mideas.hu, www.pannonstartup.hu) (hereinafter: the websites), in particular of the following:

- a. the scope of the personal data processed,
- b. the personal data processed,
- c. the purpose of data processing,
- d. the legal basis for data processing,
- e. the person authorised to perform data processing and data process,
- f. the duration of data processing,
- g. the fact that the controller processes the data subject's data pursuant to Section 6(5) of
- h. the Freedom of Information Act and
- i. the persons authorised to have access to the data.
- j. the rights and remedies of the data subject in relation to the data processing (information, correction, deletion, blocking).

Data subjects must be informed of the data protection rules of the Foundation relating to the data records as well as of the process of the handling of complaints and of the available remedies.

2. Legal background; applicable law

During the preparation of the data protection information, we paid special attention to the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on the Freedom of Information (hereinafter: the Freedom of Information Act).

3. Definitions

- <u>3.1 data subject</u> shall mean any natural person directly or indirectly identifiable by reference to specific personal data;
- <u>3.2 personal data</u> shall mean data relating to the data subject, in particular by reference to the name and identification number of the data subject or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity as well as conclusions drawn from the data in regard to the data subject;

3.3 special data:

- a) personal data revealing racial origin or nationality, political opinions and any affiliation with political parties, religious or philosophical beliefs or trade-union membership, and personal data concerning sex life,
- b) personal data concerning health, pathological addictions, or criminal record;
- <u>3.4 the data subject's consent</u> shall mean any freely and expressly given specific and informed indication of the will of the data subject by which he signifies his agreement to personal data relating to him being processed fully or to the extent of specific operations;
- <u>3.5 the data subject's objection</u> shall mean a declaration made by the data subject objecting to the processing of their personal data and requesting the termination of data processing, as well as the deletion of the data processed;
- <u>3.6 controller</u> shall mean a natural or legal person, or organisation without legal personality which alone or jointly with others determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or has them executed by a data processor;
- 3.7 data processing shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans);
- 3.8 data transfer shall mean ensuring access to the data for a third party;
- 3.9 disclosure shall mean ensuring open access to the data;
- <u>3.10 data deletion</u> shall mean making data unrecognisable in a way that it can never again be restored;
- 3.11 tagging data shall mean marking data with a special ID tag to differentiate it;
- <u>3.12 blocking of data</u> shall mean marking data with a special ID tag to restrict its further control permanently or for a definite period;

- 3.13 data destruction shall mean complete physical destruction of the data carrier recording the data;
- <u>3.14 data process</u> shall mean performing technical tasks in connection with data processing operations, regardless of the method and means used for executing the operations, as well as the place of use, provided that the technical task is performed on the data;
- <u>3.15 data processor</u> shall mean any natural or legal person or organisation without legal personality processing the data on the grounds of a contract, including contracts concluded pursuant to statutory provisions;
- <u>3.16 data source</u> shall mean a body performing public duties, which generated the data of public interest that must be disclosed through electronic means, or during the operation of which such data was generated;
- <u>3.17 data disseminator</u> shall mean a body performing public duties, which publishes the data sent to it by the data source on its website provided that the data source has not published the data itself;
- <u>3.18 data set</u>: shall mean all data processed in a single file; third party: any natural or legal person, or organisation without legal personality other than the data subject, the controller or the data processor.

4. Data protection principles

- <u>4.1 The requirement of a specific purpose:</u> Personal data may be controlled only for specific purposes, where it is necessary for exercising rights and the fulfilment of obligations.
- <u>4.2 Lawful and fair data processing:</u> The purpose of data processing must be satisfied in all stages of the data processing operations; the recording and processing of personal data shall be performed in a fair and lawful manner.
- <u>4.3 Necessity, proportionality and duration of data processing:</u> The personal data processed must be essential for the purpose for which it was recorded, and it must be suitable for achieving that purpose. Personal data may only be processed to the extent and for the duration necessary to achieve the related purpose.
- <u>4.4 Classification as personal data:</u> In the course of data processing, the data in question shall be treated as personal as long as the data subject remains identifiable through it. The connection with the data subject can be restored if the controller is in possession of the technical requirements which are necessary for restoration.
- <u>4.5 Accuracy, completeness and up-to-dateness:</u> The accuracy and completeness, and if deemed necessary in the light of the purpose of data processing the up-to-dateness of the data must be ensured throughout the data processing operation, and it must also be ensured that the data subject cannot be identified any longer than is necessary for the purposes for which the data were recorded.

<u>4.6 Data security:</u> Controllers shall make arrangements for and carry out data processing operations in a way so as to ensure full respect for the right to privacy of data subjects in due compliance with the provisions of this Act and other regulations on data protection.

Controllers, and within their sphere of competence, data processors must implement adequate safeguards and appropriate technical and organisational measures to protect personal data, as well as adequate procedural rules to enforce the provisions of this Act and other regulations on data protection and confidentiality.

Data must be protected by means of suitable measures especially against unauthorised access, alteration, transfer, public disclosure, deletion or destruction, as well as against accidental damage or loss, and it must be ensured that stored data cannot be rendered inaccessible due to any changes to the technology applied.

For the protection of data sets stored in different electronic filing systems, suitable technical solutions shall be introduced to prevent - unless this is permitted by law - the interconnection of data stored in these filing systems and the identification of the data subjects.

5. Data processing relating to advertisements

- Advertisements are published by external service providers (including Google) on websites.
- The external service providers (including Google) store the relevant information if a user has already visited the website of the advertiser using <u>cookies</u> and display the advertisement to the user based on this information.
- Users may disable Google's cookies on the <u>website for disabling Google advertisements</u>.
- For detailed information on the data protection principles of Google advertisements, please visit <u>"Advertisements and data protection FAQ"</u>.

6. The legal basis for data processing

Pursuant to Section 5(1) of the Freedom of Information Act:

"Personal data may be processed under the following circumstances: a) if the data subject has given his consent to it, or b) if processing is ordered by an act or - based on authorisation conferred by an act for a specific purpose - for a purpose based on public interest (hereinafter referred to as "mandatory data processing")."

We hereby inform the Users of the pages that data processing takes place on the basis of the voluntary, informed consent of the Users; such a declaration contains the express consent of the User to the use of his personal data provided by him while using the website as well as to the use of the personal data generated of him.

Pursuant to Section 5(1)(a) of the Freedom of Information Act, the legal basis for data processing is the voluntary consent of the data subject.

We hereby inform you that during the use of all of the online interfaces, applications and functions listed in section 9 of this information material the only legal basis for the processing of personal

data will be the voluntary and informed consent of the data subjects; none of the data processing operations concerned can be considered mandatory data processing that is based on a statutory obligation.

Cases where we request the completion of mandatory fields requesting personal data (marked by an asterisk) for the use of online interfaces, applications and functions will not constitute mandatory data processing either, since they are subject to the consents of the data subjects, which means that the data subjects may decide to leave the fields marked with an asterisk blank, thereby deciding not to use the function concerned.

7. The designation of the controller

Pannon Startup Üzletfejlesztési Alapítvány 1118 Budapest, Kelenhegyi út 60/6 E-mail: info@mideas.hu

Tax number: 18595825-1-43

8. The of scope personal data

a) Personal data (see 3.2)

We hereby inform the data subjects that we only request, collect and process personal data on the electronic data sheets of our websites, during the use of applications and functions, and do not request the provision of any special data.

b) Special data (see 3.3)

We would like to remind the data subjects that they should not include any special data in the documents sent to them. If they think that this is absolutely necessary (e.g. for the description or assessment of a project), they should inform us of this in advance, specifying the location and content of such data.

If the data subjects disclose any special data to us, without such prior notification, in any uploaded document or in the course of correspondence with us, the liability of Help2StrtUp Kft. will be excluded.

9. The description of the electronic data sheets, online interfaces, applications and functions related to the processing of personal data:

9.1 Registration

To create their own profiles and projects, Users must register. The following data must be provided during registration:

e-mail address, password, last name, first name, date of birth, telephone number, address, qualifications

Users may also register through their accounts with the social network providers below, for which they must enter a user name and a password:

Facebook, LinkedIn, Google+

9.2 Login

After registration, Users must provide the following data for login, within their own profiles:

user name, password

9.3 Providing further data within the User's profile

In addition to the data provided during registration (see 9.1), Users may provide further data after logging in:

website, photo, other documents

Users (entrepreneurs) can do the following within their own profiles:

create projects, provide project data, exchange site emails with the designated project manager of the Foundation

9.4 Deleting profiles

Users may delete their profile at any time by clicking on the 'delete' button. By deletion, all personal information and project data are automatically deleted from our system, with the exception of e-mail addresses.

After deletion, previously provided e-mail addresses cannot be used for registration again.

9.5 Creating a project

During the process of creating a project Users can specify the following data:

project ID code, project title, industry/category, website, time required for implementation, estimated total cost of implementation, short description of the project

By "submitting" projects to us, users give their consent to our processing the business information and personal data included in the projects for the specified purposes (see among the purposes of the different data processing operations). After "Submission", the project data can only be changed if the mideas team requests the submission of additional information.

Every User can have a maximum of 5 active projects at a time, not including projects already marked as "Approved" or "Rejected".

9.6 Electronic correspondence, timeline

Project owners may exchange site e-mails (in a closed system) with the managers of the mideas programme about their projects. This interface is the official forum for the management of projects after submission.

9.7 Uploading documents

Users are required to upload completed business plans in connection with their projects; business plans will serve as the basis for the assessment of projects. Users may also upload on this interface other files that contain useful information from a business point of view.

Every project is assigned a storage of 1 GB, which is available for the User to upload additional files.

9.8 Newsletter and Facebook

The users of the website may sign up for our newsletter service. They can provide the following data when signing up for the newsletter:

email address

In order to follow the Facebook page of mideas programme, the User needs to log in to his own Facebook account.

Users may unsubscribe from the newsletter by clicking on the link included in the newsletter.

Budapest, 16 June, 2014

The Board of Trustees of Pannon Startup Foundation