

Be-novative

Privacy Policy

1. Data handling principles and procedures

1.1. The Objective of Data Management

The objective of the present Guide is to establish the data protection and data management policy and principles applied by **Be-novative Zrt.** (registered seat: 9700 Szombathely, 3½. Belsikátor St, company registration number: 18-10-100717, registration authority: Szombathely Court as Court of Registration, tax ID: 25743218-2-18) and its affiliate, Be-novative Inc. (registered seat: 54I Jefferson Avenue, Suite 100, Redwood City, CA 94063; EIN: 39-2078538).

Be-novative Zrt. and Be-novative Inc. (hereinafter referred to as: the Provider) is dedicated to the protection of personal information provided for the use of those who visit the web page (hereinafter referred to as: the Web Page), register to the Blog accessible from the Web Page, register to software developed and operated by the Provider (hereinafter referred to as: the Application), or use any of these services.

It is also a top priority to ensure that the rights and fundamental freedoms of all persons are fully respected in relation to all content and services provided by the Provider during the automatic processing of personal information (data protection), especially the right to privacy, without any kind of discrimination.

By visiting or using the Web Page, as well as by using or starting any of the associated services (in particular the Blog) or applications (in particular the Software), You as the User agree to have your personal information managed in accordance with the provisions contained in the present Data Management Guide. The Provider is required to provide information at the time of data collection with respect to any other kind of data management associated with the operation of the Web Site or the Software or any other service offered by the Provider.

The present Data Management Guide is an integral part of the Terms and Conditions of Use and it is to be interpreted together with its provisions.

2. Details of the Data Controller

Name:	Be-novative Zrt.
Registered office and mailing address:	9700 Szombathely, 3½. Belsikátor St,
Phone:	+36 20 281 6953
E-mail:	info@be-novative.com
ICO registration number:	NAIH-88015/2015. NAIH-92502/2015. NAIH-92503/2015.

Name:	Be-novative Inc.
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Email: info@be-novative.com

ICO registration number: NAIH-88015/2015.
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NAIH-92503/2015.

3. Technical conditions of data management

By signing up to the Application, the User is forced to select his/her location which indicates the location of the server where the personal data will be stored. The personal data to be stored are: name, email address, password, social media ID in case of social registration. The storage and the servers are operated by Amazon Web Services Inc.(AWS). The servers are located in the European Union and in the United States of America. Users expressly understand and accept that in case of a User's location is expressly in the EU/USA, the Application will automatically choose the server which is geographically closer to User's location. User also accepts that in the described below case, the law and regulations of the given server's location will be applied without any prior notice.

Once a User is registered, his/her personal data will be stored exclusively on one of the servers and only his/her first name will be displayed on the rest of the servers.

Users expressly understand and accepts that Be-novative will not examine whether the data given by the User is valid or not. Therefore, the validity of his/her own data is exclusively User's responsibility, no direct, indirect or any other type of damage can be claimed against Be-novative. Nevertheless, if User requires a change in his/her registered data, Be-novative is obligated to realize the change as soon as possible.

4. Definitions

The terms used in the present Data Management Guide shall be interpreted in accordance with the definitions set out among the interpretative provisions contained in [Law No CXII of 2011](#) (hereinafter referred to as: the Information Act) and the Terms of Use and all the applied procedures must comply with EU law and international law, as well. Users accept that these provisions will be applied without regards to the location of the server where they have been registered.

Pursuant to the Information Act:

- *personal information*: any information which may be associated with the data subject, especially his or her name, identification number, or one or more information item specific to the data subject's physical, physiological, mental, economic, cultural or social identity, as well as any conclusion with regard to the data subject which is deductible from such information;
- *data subject*: any natural person identified on the basis of personal information, as well as directly or indirectly identifiable on the basis of such information;
- *consent*: the voluntary and explicit declaration of the data subject's will, based on adequate information, given with the purpose of providing unambiguous permission for the management of the data subject's personal information, either wholly or for certain operations;

- *data management*: regardless of the applied method, any operation or set of operations performed with the use of the information, in particular the collection, recording, organization, storage, alteration, use, querying, transmission, disclosure, coordination, combination, blocking, deletion or destruction of the information, as well as the prevention of such information's further use, creation of photographic, sound or video recording or the recording of physical characteristics, such as fingerprints, palm prints, DNA samples or retinal images, which are suitable for identifying a person;
- *data controller*: any natural or legal person, or any entity without legal personality, who or which, individually or together with others, determines the purpose of data management as well as takes and implements the decisions associated with the counts of data management, including the tools used for such purpose, or enforces these decisions through a contracted data processor;
- *transmission of data*: making the information accessible to specific third parties;
- *publication*: making the information accessible to anyone;
- *data deletion*: making the information unrecognizable in such a way as to make restoration impossible;
- *data marking*: using identification markings for making the data distinguishable;
- *data locking*: using identification markings for limiting further data management for a definite or indefinite period;
- *data processing*: the execution of technical tasks related to data management operations, regardless of the applied methods or tools, or the location of such applications, if such technical tasks are carried out in connection with the information;
- *data processor*: any natural or legal person, or any entity without legal personality, who or which is engaged in data processing on the basis of a contract concluded with the data controller, including contracts concluded pursuant to legislative provisions;

5. Data Management and the Scope of Personal Information

5.1. Registration

5.1.1. During registration for the Software, the User is required to provide the following personal information:

- name
- personal e-mail address
- password

The User may optionally provide the following information:

- photo; and
- other profile information.

5.1.2. The User is required to provide an e-mail address when registering on the Web Site for updates related to the Blog.

5.2. **Downloading Content Published by the Provider.** The User is required to provide the following personal information when downloading the infographics and other content published on the Web Site (and the related Blog):

- name;
- personal e-mail address;

5.3. Updates.

Periodically or occasionally, the Provider sends Updates to the e-mail address provided by the User during registration. The purpose of these Updates is providing information for the User regarding new content added to the Software and other marketing promotions launched by the Provider. The User may indicate in the Software if he or she does not wish to receive Provider Updates (unsubscribe). Such contents are, in particular:

- new global challenges;
- feedback on past challenges; and
- marketing or communication campaigns and notifications.

5.4. System Notifications. Periodically, the Software sends System Notifications to the e-mail address provided by the User during registration. The purpose of these System Notifications is providing information for the User regarding his or her own activity as well as the relevant activity of other Users within the Software. The User may indicate in the Software if he or she does not wish to receive System Notifications from the Provider (unsubscribe).

5.5. Information Recorded on the Basis of IP Address. Technical information recorded during the operation of the system: information related to the computer used by the User to log in, generated during the use of the Services and automatically recorded by the data controller's system as a result of technical processes. The automatically recorded information is logged automatically by the system at login and exit as well as during the use of the Web Page or the Software, without requiring a separate declaration or act by the User. These information cannot be linked with other personal user information, except for the cases mandated by law. The data controller is the only person or entity who has access to the information.

5.6. Cookies. During visits to the Web Page, we send one or more Cookies, i.e. small files containing character sequences to the visitor's computer in order to provide unique web browser identification. These Cookies are certified by the Provider and, in connection with Google Analytics, by Google. Cookies generated by Google Analytics are used via the Google Adwords system. These Cookies are sent to the visitor's computer only in case of visits to certain subpages, meaning that they will only store the fact and time of the visit to the given subpage, and nothing else.

After the Cookies are sent, they may be used for the following purposes: Cookies generated by the Provider are used for storing certain setting information and information associated with the current session. Google uses these Cookies to store earlier visits by the User to the advertiser's site for statistical purposes.

Cookies applied:

- Analytics and monitoring Cookie – Google
- Monitoring through the Web Site – Google
- Login Cookie, session Cookie for identifying the User, Cookie for other settings – Be-novative

The "Help" function in the menu bar of most browsers provides the following information:

- name;
- how to block Cookies in the browser;
- how to accept new Cookies;
- how to set your browser to use new Cookies; or
- how to turn off other Cookies.

5.7. Order and Payment

In accordance with the provisions in 7.1.2. of the GTCCU of Be-novative, the Customer concludes a contract with Be-novative Inc. for the purchase of a Business Closed Platform, which creates a legal obligation to pay the license fee on the Customer's side. The payment of the Fee for the Service described in this section is only made through a transaction via online banking card data. For this purpose, Be-novative is entitled to receive the bankcard and billing information required for the payment of the Fee from the Customer, which will be forwarded to a third party (Chargebee Inc.) for the purpose of conducting the transaction. Data is stored by the third party.

Be-novative Inc., as well as the third party, will handle the following personal information:

- Name
- Billing address
- Tax number or Community tax number
- Name written for a bank card
- Bank card number
- Bank card expiration date
- Bank card CVV

Be-novative Inc., as the sole wholly-owned subsidiary of Be-novative Zrt., acts in compliance with the law on data handling of Be-novative Zrt. It also complies with the provisions of the US Online Privacy Protection Act, California Business Professions Code 22575-22579.

6. The Legal Basis and Objective of Data Management

The legal basis for data management is that the provided information is managed on the basis of a voluntary declaration given by adequately informed Users of the online content provided by the Provider, containing the explicit consent of the Users for the management of their personal information provided by them during the Web Site's use.

Based on provisions contained in point a) of paragraph 5.§ (1) of Law No CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act"), the legal basis for data management is the voluntary contribution of the interested party. The User gives its consent with regard to the individual counts of data management by using the Web Site or the Software, by registration and by the voluntary provision of the requested information.

The purpose of data management is to guarantee the provision of Services made available on the Web Site. These Services include, in particular, access to the Software developed and operated by Be-novative, the use of the Software, the downloading of content published by the Provider on the Blog accessible from the Web Site as well as receiving notifications about new content.

The purpose of the Updates and the counts of data management associated with System Notifications is the provision of adequate information to the Users as well as providing information about new content and about the Users' activity within the Software. The purpose of messages sent to the Users by the Provider is marketing communication aiming at promoting the Provider's projects and actions.

The purpose of automatic information recording is gathering statistical information which will be used for the technical development of the IT system and the protection of User rights.

The data controller will not and cannot use the provided personal information for purposes different from those listed here. Personal information may only be released to third parties or authorities with the prior and explicit consent of the User, unless otherwise provided by law.

The Provider is required to take all necessary technical and organizational measures to develop and implement the necessary rules of procedure in order to ensure the privacy of personal data provided or made available by the User during the entire process of data management.

The User has the right to object to the management of his or her personal information via e-mail sent to info@be-novative.com

- if the management or transmission of such personal information occurs for the fulfillment of legal requirements affecting the Provider only, for the enforcement of the legitimate interest of the data controller, data recipient or a third person, except for cases of so-called mandatory data management;
- if the management or transmission of such personal information occurs for purposes of direct marketing, public opinion polling or scientific research; or
- in any other case established by law.

If the Provider finds that the User's objection is well-founded, the Provider is required to discontinue data management, including any further data collection and data transfer, lock the available information, and then inform all recipients of the User's personal information affected by the objection about the objection, about the measures taken in connection with the objection, and about their obligation to take action and enforce the User's right to objection.

7. The Scope of Persons Accessing the Information, Data Transmission and Data Processing

The right to access the information is primarily held by the Provider and the Provider's employees; however, they are required not to publish or transfer these data to third parties.

As part of the operation of the underlying IT system and the settlement of accounts, the Provider is entitled to employ a data processor. The Provider is not responsible for the data management practices applied by such third parties.

The scope of Data Controllers:

Company name

Adress

a) Amazon Web Services, Inc.

EU (Frankfurt area)
US East (N. Virginia)
US West (N. California)

Data storage and protection is operated by Amazon Web Services, Inc. (see above 3.)

Exact geographical location of servers are not publicly known, due to the business and security policies of Amazon Web Services, Inc.

Amazon Web Services, Inc. participates in EU-US Privacy Shield programme.

b) Bilance Kft.

H-2900 Komárom, Erdélyi Str. 4.

Bilance Kft handles personal data of Individual Users with paid account/services located on the EU server.

**c) Global Value Add, Inc.
(DBA myStartUpCFO)**

4512 Legacy Drive Unit 100 Plano TX 75024, USA

Global Value Add, Inc. handles personal data of Individual Users with paid account/services located on the US servers.

d) Chargebee Inc.

Showplace Square, 350 Rhode Island St, Suite 240,
South Building, San Francisco, CA 94103, USA

Chargebee Inc. as a payment transactional party and as a third party managing the Customer's sensitive data in this connection is a member of the Privacy Shield Agreement and provides European-level protection for its data management.

Beyond the above, the User's personal information can only be transmitted when required by the Law or based on the User's consent.

8. Enforcement Options

The User may request information at any time with regard to his or her personal information managed by the Provider, which he or she has the right to change at any time. The User may also request the deletion of his or her data by sending a message to the contact details given in this section.

Upon request by the User, the Provider is required to provide information with regard to the User's data managed by the Provider, including the purpose, legal basis and duration of data management as well as the identity of those receive or have received the User's data, and for what purpose. The Provider is required to reply in writing within 30 days upon the submission of such request.

The data subject can exercise his or her rights using the following contact details:

Postal address: **Be-novative Zrt.,**
9700 Szombathely, 3½. Belsikátor St,
E-mail: info@be-novative.com
Phone: +36 20 281 6953

The User is entitled to request the correction or deletion of data recorded incorrectly at any time. The right to deletion does not include the counts of data management required by law, such as accounting regulations; such counts shall be retained for the required period of time.

Pursuant to the Privacy Act and Law No V of 2013 (on the Hungarian Civil Code), the User is entitled to enforce his or her rights in the courts of law or lodge a complaint at the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (1125 Budapest, 22/C Szilágyi Erzsébet fasor) with regard to the data management practices of the data controller.

If the User provided the personal information of third parties during registration with the purpose of using the Services, or has caused any kind of damage during the use of the Web Site, the Provider is entitled to claim compensation from the User. In such cases, the Provider is required to provide all assistance to the competent authorities in order to establish the identity of the offender.

9. Additional Provisions

The Provider's system is entitled to collect information associated with the User's activity. In each case, when the Provider wishes to use the provided information for other than the original purpose of data collection, the Provider is required to inform the User in advance and obtain the User's prior express consent or else guarantee the User's right to prohibit such use of the information.

The Provider reserves the right to unilaterally amend this Regulation upon prior notice to the User. Following the entry into force of the amendment, the User implicitly accepts the amended Regulation by using the service.

01 November 2017, Budapest