

PRIVACY POLICY

I. The handling of Clients' data, the purpose of data handling

1. HelloPay cPlc. (HP) handles clients' data at the clients' consent and based on the prescriptions of law. The HP's privacy policy registration number is: NAIH-85490/2015

2. In order to provide for the safety of personal information, HP has determined its data handling policy in observance of Act CXII of 2011 on information self-determination and freedom of information (hereinafter as Information law), as well as the provisions of other relevant legal measures.

3. HP seeks to define through the current policy its principles and practice in the handling and protection of the personal data of HelloPay system users provided through their lawful registration.

4. The purpose of the central data handling of HP - including the data processed by HP or by a third party - as well as the data handling of Partners is determined in the following:

* The operation of the HelloPay system (hereinafter as System), claims management, the settling of resulting turnover in relation to Card owners and Partners;

* Data provision pertaining to Card owners and Partners during registration, data modification, and data supplement, including information about transactions;

* The monitoring and familiarization of consumer habits, card usage and other behavior, as well as developing and delivering individualized offers to Card owners;

* Cooperative efforts in resolving claims arising from Card owners or Partners during System usage.

II. Legal grounds for data handling

1. In order to provide for the wide-spread utilization of benefits offered by the System, Card owners may register themselves or their cards through the HP website, located at the following internet address: www.hellopay.hu

2. In relation to the usage of the System, Users may decide to register themselves and their card in order to prevent other, unauthorized parties

from using said card in an unjustified manner. Data provision is voluntary upon registration.

3. Card owners state in relation to card usage and registration that they have understood and familiarized themselves with the rules and provisions of the System, accepting their adaption and recognizing the binding nature of said provisions in relation to their conduct and consenting to the data handling in relation to the nature of the data provided by users during registration.

4. Card owners accept and consent to HP processing (by itself or via a third party) the data they provided through the website during registration (hereinafter as Client data), as well as data referring to transactions performed via the card (hereinafter as Transactions).

5. Upon registration, Card owners consent to HP resorting to the services of subcontractors in order to realize the purposes outlined in I.4 above. The data processing of subcontractors is for the exclusive purpose of the operation of the System; the subcontractor is required to destroy the data provided to them by HP upon termination of the contract (or the purposes outlined within said contract).

6. By utilizing the services, Card owners accept and recognize the binding nature of the provisions of the current Privacy Policy, including the amendments to said Privacy Policy upon its amendment.

III. Data security

1. HP ensures that no unauthorized parties may access, publish, forward, modify or delete the handled data. Only the data handler and the relevant employees of the data processor may be privy to the data handled and HP will not provide the data to any third parties who are unauthorized to access said data.

2. Card owners' Client data and Transaction data will be stored and processed by HP according to the relevant regulations. It is forbidden to provide personal information (Client data) to third parties - with the exception of subcontractors, see item IV, above. The forwarding of Transaction data is only possible by providing data without any Client data, ensuring that the information cannot be linked to any individuals or card owners.

3. HP is entitled - in observance of the relevant regulations - to approach Card owners directly with business offers. However, Card owners may request HP to refrain from sending said offers. Please send a request in writing to info@hellopay.hu

4. Card owners are authorized to partially or fully revoke their consent to the lawful handling and processing of their data, including its conveyance, and request the removal of their personal information by requesting said measures in writing to HP via a statement forwarded to info@hellopay.hu. Should the Card owner revoke their consent for data handling and conveyance in such a way which would render the collection of their transactions, registration, settling or the validation of their rights or fulfillment of their obligations related to the System in any other way impossible, said revocation statement constitutes the termination of the Card owner's participation in the HP's system.

5. Card owners may request HP to rectify their personal information. Card owners may request information through the help desk of HP on the handling of their personal information. At the request of Card owners, HP will provide a detailed written statement on the data being handled, the purpose and duration of its handling and other data handling-related activities, as well as who and for what purpose was the data provided to. Said information will be provided in the shortest possible time by providing said information to Card owners in writing within 30 days at the latest. In the case of the rejection of such requests, Card owners may request legal remedies as well as turn to the National Authority for Data Protection and Freedom of Information.

IV. Subcontractors involved in the data processing

Based upon the provisions of the Information law, HelloPay cPlc., as the operator of the HelloPay network, is a qualified data handler. The information technology backing of the system is provided by Lets Ltd. (1126 Budapest, 19 Böszörményi Road, building C, ground floor/7, Hungary). The HelloPay website is maintained by Eldacon Ltd. (1094 Budapest, 57 Tűzoltó St., Hungary).

HP reserves the right to unilaterally modify the current privacy policy while informing visitors of said modifications.

Budapest, 6 May, 2015