



# Data Privacy Notice - Marketing data processing activities

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**Classification:** SOCWISE Public

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# SOCWISE Kft. – Data Privacy Notice - Marketing data processing activities



Classification: SOCWISE Public

## 1 Overview

Information security is a vital component of business success and it is especially important for SOCWISE Kft. (furthermore, SOCWISE or Company). This document contains the rules on data protection.

### 1.1 Document Control

This document is reviewed annually and is reissued when revisions are necessary and approved. Obsolete copies of this document shall be destroyed.

### 1.2 Change History

Version	Change Date	Author	Change Description
1.0	25.09.2023.	Anonymized	Initial version

## 2 Applicability

These provisions shall be interpreted in accordance with the provisions of the current data privacy regulations. In case of contradiction between these provisions and the provisions of any other document entered into force prior to this document regarding the protection of personal data, these provisions shall prevail.

## 3 Introduction

We are committed to protecting the privacy of our customers and partners, and therefore we provide details of our data processing activities. In this document, you will find information about your rights with data protection, the scope of personal data processed, our company's data protection principles and responsibilities, and the security measures and guarantees implemented.

In order to record the internal data management processes of SOCWISE Kft. (hereinafter also referred to as: the Data Controller) and to ensure its obligations in relation to data management activities, our data management activities listed in this document are described in detail below.

### 3.1 Information about the data controller

<b>Name of the data controller</b>	SOCWISE Kft.
<b>Head office</b>	120-122. Róna street, Budapest, ZIP: H-1149
<b>Company registration number</b>	01-09-356167
<b>Website</b>	<a href="http://www.socwise.eu">www.socwise.eu</a>
<b>E-mail address</b>	<a href="mailto:socwise@socwise.eu">socwise@socwise.eu</a>
<b>Data Protection Officer</b>	Data Controller not required to appoint a Data Protection Officer

### 3.2 Description of data processing activities

The table below describes the activities necessary to achieve the data processing purposes covered by this notice.

### 3.2.1 Data processing activities, scope of personal data processed, data subjects, purpose of data processing and storage period of personal data

Data Processing Activity	Data Processing Activity Description	Data Processing Activity ID	Processed Personal Data	Categories, Range of Data Subjects	Objective of Data Processing	Personal Data Retention
Newsletter sending	Managing data for sending newsletters. People can subscribe to newsletters in several places, such as the website and events.	DP.40	<p><b>Personal data:</b> Name, e-mail address, phone number, job role, organisation</p> <p><b>Technical data:</b> Position, Time of signing up (Optin_Timestamp/Last_Updated_Timestamp), The IP address used upon signing up (Optin_IP_Address), GPS data (Latitude / Longitude), Zip_Code, Marketing Permissions, Source</p>	Newsletter subscribers	Identifying subscribers, enabling subscriptions	1 day calculated from the date of unsubscription
Event organisation and management	Processing of data necessary for the organisation and management of online (webinar), hybrid and live events, e.g. for the registration of participants and communication with participants.	DP.41	Name, e-mail address, phone number, job role, organisation, image (if live events are recorded)	Event participants	Registration of participants and communication with participants	<p>Photo (with face): 5 years calculated from the creation</p> <p>Participation data: 1 year calculated from the from creation</p>

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Marketing analytics	Collecting and analysing data on the performance of marketing activities on online channels using Google Analytics 4, which uses cookies on the website.	DP.42	Randomly generated visitor ID, geolocation (country, city), operating system and browser, interest (e.g. mobile and technology) as a percentage, returning/non-returning guests, age bands	Website visitors	Collection and analysis of data on the performance of marketing activities on online channels	1 year and 1 month calculated from the date of visit
Preparation of promotional materials (photo, video)	Show staff in marketing materials (branding photos, videos)	DP.43	Name, image	Photographed staff	Staff presentation, branding, promotion	10 years calculated from the date of creation

### 3.2.2 Source of the data

The source of the personal data processed in these processing activities is the data subject (e.g. website visitor, newsletter subscriber, event participant).

### 3.2.3 Legal basis of the processing activity and role in the processing activity

Data Processing Activity	Data Processing Activity ID	Role in Data Processing	Legal Basis of Data Processing
Newsletter sending	DP.40	Data Controller	Data subject's consent
Event organisation and management	DP.41	Data Controller	Data subject's consent
Marketing analytics	DP.42	Data Controller	Data subject's consent
Preparation of promotional materials (photo, video)	DP.43	Data Controller	Data subject's consent

## 4 Data transfers and data security

In the context of the processing activities described in this notice, data will be transferred to the following recipients who may be involved in the provision of the service or related security solutions.

Concerned data processing activity	Recipient information	Purpose of the transfer	Personal data involved in the transfer
Newsletter sending	Active Campaign EURO ONE	Using the newsletter platform	<p><b>Personal data:</b> Name, e-mail address, phone number, job role, organisation</p> <p><b>Technical data:</b> Position, Time of signing up (Optin_Timestamp/Last_Updated_Timestamp), The IP address used upon signing up (Optin_IP_Address), GPS data (Latitude / Longitude), Zip_Code, Marketing Permissions, Source</p>

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Event organisation and management	Active Campaign Hopin EURO ONE	Active Campaign: registration Hopin: webinar, using online conference platform	Name, e-mail address, phone number, job role, organisation, image (if live events are recorded)
Marketing analytics	Google, Hotjar EURO ONE	Google: using marketing analytics platform Hotjar: using marketing analytics platform	Randomly generated visitor ID, geolocation (country, city), operating system and browser, interest (e.g. mobile and technology) as a percentage, returning/non-returning guests, age bands
Preparation of promotional materials (photo, video)	EURO ONE	Production of marketing materials	Name, image

The Data Controller uses the following data processors to carry out the data processing activities described in this notice:

<b>Data processor</b>	<b>Headquarters of the data processor</b>	<b>Activities performed by the data processor</b>
EURO ONE Számítástechnikai Zrt. (parent company)	50-52. Újvilág street, Budapest, ZIP: H-1145	External marketing service provider
Maxer Hosting Kft.	31. Arany János street, Győr, ZIP: H-9021	Website hosting provider Privacy information: <a href="https://maxer.hu/adatkezelesi-tajekoztato.html">https://maxer.hu/adatkezelesi-tajekoztato.html</a>
Active Campaign	EU: 160 Shelbourne Rd, Dublin, D04 E7K5, Suite 03-101, Dublin, Dublin, 2	Running marketing platform Privacy information: <a href="https://www.activecampaign.com/legal/privacy-policy">https://www.activecampaign.com/legal/privacy-policy</a>
Hopin	EU: Hopin Ltd, 5 Churchill Place, 10th Floor, London, E14 5HU	Running an online webinar platform Privacy information: <a href="https://hopin.com/hopin-events/legal/privacy">https://hopin.com/hopin-events/legal/privacy</a>



Google	EU: Dublin Gordon House Barrow St Dublin 4 Ireland	Operating marketing analytics analysis platform Privacy information: <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>
Hotjar	Dragonara Business Centre 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141 Malta	Operating a marketing analytics analysis platform Privacy information: <a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a>
Microsoft	EU: Konrad-Zuse-Str.1 85716 Unterschleißheim Germany	Providing cloud-based e-mail service Privacy information: <a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>

#### 4.1 Data protection measures

The Controller shall take the necessary technical and organizational measures and establish appropriate rules of procedure to ensure the security of personal data throughout the entire process.

The Data Controller has implemented and maintains an Information Security Management System based on the ISO 27001 international standard, whose information security controls also ensure the security of data processing. High priority organisational and technical measures are:

- Need to know, Least privilege access principles
- Strong password requirements and multi-factor authentication
- Protection against malicious software
- Security logging and monitoring
- Network segmentation and border protection
- Encryption
- Mandatory security awareness training
- Backup
- Lockable rack cabinet and card access control system
- Security requirements imposed on third parties.

## 5 Rights and remedies in relation to data processing

In relation to the processing activities, the persons concerned (Data Subjects), i.e. you, have certain rights, which you can find out about below. You can exercise your rights through the contact details of the Data Controller given above.

## 5.1 Right of access to personal data

You may request information from the Data Controller about:

- what personal data,
- on what legal basis,
- for what processing purposes,
- from what source,
- for how long it is processed,
- to whom, when, on the basis of which law, to which of your personal data the controller has given access or to whom the controller has transferred your personal data.

You may request a copy of your personal data processed by the controller under Article 15 of the GDPR. We may charge an administrative fee for additional copies, the amount of which and the method of payment will be notified in advance to the contact details you have provided to us for this purpose.

## 5.2 Right to rectification

You have the right to ask the Data Controller to modify any of your personal data (for example, to change your e-mail address at any time). The Data Controller will comply with your request without undue delay but within one month at the latest and will notify you accordingly to the contact details you have provided for this purpose.

## 5.3 Right to erasure, right to be forgotten

Based on your right to erasure, you have the right to have your personal data erased from the Data Controller's systems without undue delay upon your request.

The "right to be forgotten" is an extension of the right to erasure to the online environment, whereby, if the Controller has disclosed your personal data and is required to erase it, it must take reasonable steps to inform the controllers who process your personal data that you have requested the erasure of links to or copies of your personal data.

In relation to this data subject right, it is important to note, however, that it is not possible to erase or "forget" personal data in one of the cases set out in Article 17(3) of the GDPR (e.g. where there is a legal obligation to retain the data).

## 5.4 Right to restriction of processing (blocking)

You have the right to have the controller restrict, commonly known as block, the processing of your personal data at your request if one of the following conditions is met.

- You contest the accuracy of your personal data. In this case, the restriction shall apply for the time necessary to allow the controller to verify the accuracy of those personal data.
- The processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use.
- The controller no longer needs the personal data for processing, but you require them for the establishment, exercise, or defense of legal claims.

- You have objected to the data processing. In this case, the restriction applies for a period until it is established whether the controller's legitimate grounds prevail over your legitimate grounds. The Data Controller will inform you in advance of the unblocking.

## 5.5 Right to data portability

You may request that the Data Controller sends the personal data you provided in a structured, commonly used, machine-readable format to the contact details provided for this purpose. You also have the right to have this data transmitted by the Controller to another Controller, where technically feasible.

## 5.6 The right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data where the processing of your personal data is based on the legitimate interests of the controller, or grounds of public authority or for direct marketing purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for these purposes.

## 5.7 Complaints and remedies

If you consider that the Data Controller has infringed the applicable data protection provisions in the processing of your personal data, you may:

- Notify the Data Controller.
- File a complaint with the supervisory authority.

Contact details of the Supervisory Authority:

Nemzeti Adatvédelmi és Információszabadság Hatósága / *Hungarian National Authority for Data Protection and Freedom of Information*

Mailing address: 1363 Budapest, Pf. 9.

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <https://www.naih.hu/>

- You can go to court.

You have the right to apply to a court, which will rule on the case out of turn, to protect your data. You can find the contact details of the courts at the following link: <http://birosag.hu/torvenyszekek>.