



Title: Privacy policy on data processing in connection with Black Cell websites	
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The Black Cell Magyarország Ltd. (registered office: 1064 Budapest, Vörösmarty street 67.; company register number: 01-09-943820; tax number: 22793348-2-42; authorized representative: Gergő Gyebnár, CEO) as a data controller and website operator (hereinafter referred to as the "controller" or "Black Cell"), is committed to protect the personal data of its customers and business partners and takes all organisational and technical measures to ensure the security of the personal data of those involved in the processing activities.

The Data Controller publishes its Privacy Policy below regarding the processing of personal data in connection with the <https://blackcell.hu/> and <https://blackcell.io/> websites and their sub-pages

This Privacy Policy describes our practices regarding to the processing of personal data of visitors our websites, the scope of the data procession, the measures taken to protect personal data and the ways and means of exercising the rights of the natural persons concerned. The natural persons concerned has the right to acquaint themselves with this privacy policy electronically on the websites of the controller.

The personal data procession includes, but are not limited to, name, company name, the given telephone number, IP address, ID, date of registration, email address, location, information about the user of our websites and social networking sites, communications with the controller.

The processing is based on a contract, voluntary consent, or a legitimate interest in the business relationship of the parties concerned. Consent to the processing based on voluntary consent may be freely withdrawn at any time or the data subject may exercise the right of access, rectification, restriction, or erasure.

The processed data used for business contact, sending newsletters, organizing professional events, applying for jobs, statistical and marketing analysis, marketing and remarketing purposes, system testing, customer satisfaction surveys, and to help us maintain and improve our websites. The processing of personal data may involve profiling by the controller, which in all cases will only be carried out with the consent of the data subject.

The data will be processed by the controller until the withdrawal of the data subject's consent or until the expiration of the legal deadline, in the case of a job application, until the closing of the recruitment process or until the withdrawal of the data subject's consent.

The data are processed only for the purposes which they are intended, under controlled conditions and only by those who need to access them for the fulfilment of their duties. The controller also requires its processors to implement the highest possible level of protection described below, which Black Cell implements during the processing.

1. Data processing related to sending newsletters

1.1. The data subjects of the procession are the natural persons who subscribe to receive the newsletter on the websites <https://blackcell.hu/> and <https://blackcell.io/> and on the subpages of these websites.

1.2. The legal basis for the processing of personal data is the consent of the natural persons concerned to the processing in accordance with Article 6(1)(a) of Regulation (EU) 2016/679



of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

- 1.3. The scope of the data procession is the name and e-mail address of the data subject.
- 1.4. Duration of data procession: the Data Controller processes personal data until the withdrawal of the data subject's consent. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
- 1.5. The purpose of data processing is to communicate news about products and services available in the portfolio of the data controller and to inform the data subject.
- 1.6. The Data Controller uses the services of Intuit Inc., a data processor registered in the United States of America, for the purpose of using the Mailchimp newsletter platform in the data management process for sending newsletters. More information about the data management activities of Intuit Inc. can be found in the company's privacy notice available on its website (<https://www.intuit.com/privacy/>). The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subject by amending this Privacy Policy.
- 1.7. With reference to point 1.6. data subjects' data will be transferred to a third country (United States of America).
2. Data processing in relation to web contacting
 - 2.1. The data subjects of data processing are the natural persons who fill in the dedicated contact forms with their personal data on the websites <https://blackcell.hu/> and <https://blackcell.io/> and on the subpages of these websites and provide it to the data controller.
 - 2.2. The legal basis for the procession of personal data is the consent of the natural persons concerned in accordance with Article 6 (1) (a) of the General Data Protection Regulation.
 - 2.3. The processed data includes the given name, e-mail address, given telephone number and place of work of the data subject. The data subject has the right to provide additional data in free text in the message field, which may include personal data.
 - 2.4. Duration of data procession: the Data Controller processes personal data until the withdrawal of the data subject's consent. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
 - 2.5. The purpose of data processing is to provide information about the products and services available in the portfolio of the Data Controller, to inform the data subject about the issues that may arise individually.
 - 2.6. The Data Controller does not use the services of any data processor in the data management process for web contacting. The Data Controller reserves the right to involve additional processors in the future in the data processing process, which will be communicated to the data subjects by means of an amendment to this Privacy Policy.



3. Data processing in connection with job applications
 - 3.1. The data subjects of the procession are the natural persons who submits a job application to the Data Controller electronically or by paper form.
 - 3.2. The legal basis for the procession of personal data is consent of the natural persons concerned in accordance with Article 6 (1) (a) of the General Data Protection Regulation.
 - 3.3. The processed data are primarily the name, photograph, date, and place of birth, given contact details (e-mail address, telephone number, postal address), professional experience and competences, educational qualifications, and any personal data that the data subject may provide to the Data Controller in connection with the job application.
 - 3.4. Duration of processing the personal data brought to the attention of the Data Controller by the data subject will be processed primarily until the withdrawal of the data subject's consent, otherwise until the purpose of the processing in accordance with point 3.5 of this Privacy Policy ceases, such as until the job application is filled or the position is no longer advertised. If the data subject gives specific consent regarding the submitted job application may be kept for a further 6 months after the termination of the publication of the relevant job offer.
 - 3.5. The purpose of the procession is to fill the positions advertised by the Data Controller with the most suitable natural persons who have submitted job applications, based on their competences and qualifications.
 - 3.6. The Data Controller may use the services of the following data processors for data processing in connection with job applications: law firm (Kelemen, Mészáros, Sándor & Társai Law Office, H-1052 Budapest, Váci utca 24.), accounting firm (Adóideál Plusz Ltd., H-1194 Budapest, Zalaegerszegi út 160. The Data Controller reserves the right to involve additional data processors in the data processing process in the future, which will be informed to the data subjects by means of modifications to this Privacy Policy.
 - 3.7. Only natural persons who have an employment or other legal employment relationship with the Data Controller are involved in the administration or selection of job applications, as well as data processors described in section 3.6, are entitled to access personal data. Data may be transferred only in relation to processors as described in point 3.6 and in the case of execution of a legal obligation or a decision by a public authority.
4. Data processing in relation to the enforcement of legal claims
 - 4.1. The data subjects of data procession are natural persons who have a legal relationship with the Data Controller.
 - 4.2. The legal basis for the processing of personal data is the legitimate interest of the controller pursuant to Article 6 (1) (f) of the General Data Protection Regulation.
 - 4.3. The scope of the data procession is the personal data necessary for the establishment and exercise of legal claims, in particular, but not limited to, official communications (by e-mail and post).



- 4.4. Duration of data procession: the Data Controller shall process personal data until the end of the period for asserting claims under Act V of 2013 on the Civil Code, but no later than the end of the 5th calendar year following the termination of the legal relationship between the parties.
 - 4.5. The purpose of the procession is to pursue legal claims and to ensure a successful defence in a dispute or any administrative procedure.
 - 4.6. The Data Controller does not use services of any data processor in the data management process related to the enforcement of legal claims. The Data Controller reserves the right to involve additional processors in the future, in particular individual lawyers, or law firms, in the data processing process, which it will inform the data subject of by amending this privacy notice.
5. Deal registration-related data processing
- 5.1. The data subjects of the procession are the natural persons who fill in the dedicated contact forms with their personal data on the websites <https://blackcell.hu/> and <https://blackcell.io/> and on the subpages of these websites and send them to the controller or otherwise disclose their contact personal data to the Data Controller.
 - 5.2. The legal basis of procession of personal data is the consent of the natural persons concerned in accordance with Article 6 (1) (a) of the General Data Protection Regulation.
 - 5.3. The data processed include the name, given e-mail address, telephone number and place of work of the data subject. The data subject is entitled to provide additional data in the form of free text, which may contain personal data.
 - 5.4. Duration of procession: the Data Controller processes personal data until the withdrawal of the data subject's consent. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
 - 5.5. The purpose of data procession is to refine commercial offers and to participate in the deal registration process, which ensures that potential customer partners can benefit from favourable pricing structures with the supplier partners of the Data Controller.
 - 5.6. The Data Controller uses the services of the following data processors in the deal registration data management process. The Data Controller reserves the right to involve additional data processors in the data processing process in the future, which it will inform the data subjects about by amending this Privacy Policy.
 - 5.6.1. Clico Hungary Kft. (1134 Budapest, Dévai utca 26-28.; company registration number: 01-0276058; e-mail address: info@clico.hu);
 - 5.6.2. Palo Alto Networks Ltd. (headquarters: 3000 Tannery Way, Santa Clara, CA 95054; e-mail address: info@paloaltonetworks.com);
 - 5.6.3. IBM Magyarország Ltd. (registered office: 1117 Budapest, Neumann János utca 1.; company registration number: 01-09-060028);



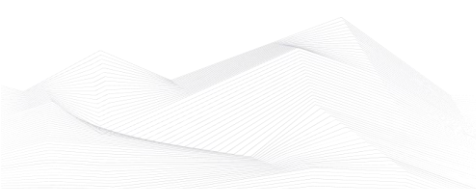
- 5.6.4. Sophos Ltd. (registered office: 1117 Budapest, Alíz street 1.; company registration number: 01-09-988725; e-mail address: info@sophos.com);
- 5.6.5. Exclusive Networks Hungary Ltd. (registered office: 2038 Sósút, Rákóczi utca 14.; company registration number: 13-09-204542, e-mail address: sales@veracomp.hu);
- 5.6.6. HRP Europe Ltd. (registered office: 1033 Budapest, Huszti út 34; company registration number: 01-09-663082; e-mail address: info@hrp.hu);
- 5.6.7. Arrow ECS Computer Technology Ltd. (registered office: 1117 Budapest, Neumann János utca 1/E. 1st floor; company registration number: 01-09-698831; e-mail address: info.ecs.hu@arrow.com);
- 5.6.8. Acunetix Ltd. (registered office: 101 Finsbury Pavement, Moorgate, London, EC2A 1RS United Kingdom; e-mail address: support@acunetix.com).

6. Data processing in connection with the use of Microsoft Teams

- 6.1. A video or voice call meeting through the Microsoft Teams application is co-managed as joint data controllers by Black Cell and Microsoft Corporation, whose European operations are overseen for data protection matters by Microsoft Ireland Operations Limited - One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.
- 6.2. The data subjects of the procession are the natural persons participating in the video or voice call.
- 6.3. Legal basis of procession personal data in accordance with Recitals 44 and 47 of the General Data Protection Regulation is the legitimate interest of the controller or a third party based on Article 6 (1) (f) of the GDPR.
- 6.4. The scope of the data procession is the data collected by the data controller through the Microsoft Teams application about the use of the application's features and information about the communication, such as the date and time of the communication and the users involved in the communication.
- 6.5. The purpose of data procession is to enable business collaboration in a digital way, to ensure the more efficient functioning of the application and to provide the best user experience for the data subjects.
- 6.6. In case of any questions raised about privacy when using the Microsoft Teams application, Microsoft Corporation will provide you with information using the form provided (<https://privacy.microsoft.com/en-us/privacystatement>).

7. Rights in relation to data processing

- 7.1. The data subject has the right to exercise the rights provided in Articles 15 to 22 and 34 of the General Data Protection Regulation in relation to the processing of personal data, in particular, but not limited to, the right to access, rectify, erase, restrict processing and object,





through the Data Protection Officer (hereinafter referred as DPO) in accordance with point 7.2 of this Privacy Policy.

- 7.2. The DPO is in any case obliged to decide within one month on any request for information or enforcement from the data subject and to inform the data subject of the decision or action taken on the request. The Data Protection Officer is Zsolt Baranya (postal address: H-Budapest 1064, Vörösmarty utca 67, IV. floor 2; e-mail: dpo@blackcell.io).
- 7.3. The natural person concerned may report on the data processing activities of the Controller to the designated supervisory authority in accordance with Article 51/A of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information and Article 57 (1) of the General Data Protection Regulation. In Hungary, the supervisory authority is the National Authority for Data Protection and Freedom of Information (NAIH, headquarters: H-Budapest 1055, Falk Miksa utca 9-11.; postal address: H- Budapest 1363, P.O. box: 9; telephone: +36 (30) 683-5969 and +36 (30) 549-6838; e-mail: ugyfelszolgalat@naih.hu).
- 7.4. The data subject may take legal action against the Controller in the event of an alleged infringement of personal rights. The Metropolitan Court of Budapest (Fővárosi Törvényszék) shall have jurisdiction to rule on the action. The lawsuit may also be brought before the court of the place of residence or domicile of the data subject.

8. Handling of "cookies"

- 8.1. The Data Controller uses "cookies" on its websites under this Privacy Notice. Cookies are files that store identifying information on the terminal equipment of natural persons who download the websites. In accordance with the provisions of Directive 2002/58/EC of the European Parliament and of the Council concerning the processing of personal data and the protection of privacy in the electronic communications sector (hereinafter referred as "Directive on privacy and electronic communications"), users must be informed in advance of the purpose of the use of cookies. The use of cookies is subject to the consent of the user; therefore, it should be possible for the user to refuse the installation of cookies on terminal equipment.
- 8.2. The purpose of the use of cookies is to identify and distinguish unique users among visitors, to identify sessions, to store data provided in sessions, to prevent the loss of stored data, to track visitors and to measure web analytics to provide a personalized service to visitors.
- 8.3. The legal basis for data processing is the statistical and marketing purposes, the legitimate interest of the data controller to provide a better user experience and to ensure the operation of the websites, and the consent of the data subjects to the processing of their data.
- 8.4. The personal data processed is the IP address of the data subject.
- 8.5. While using the websites, the user has the possibility to choose which cookies to allow. This consent can be withdrawn at any time and the users can delete the cookie files placed on their device. The user's device may be a desktop computer, laptop, smartphone, or tablet used to access the website.



8.6. We distinguish between our own and third-party cookies according to the user of the cookie. Persistent cookies, which remain on the user's device for a limited period of time or until deleted by the user. Or session cookies, which are temporarily placed on the user's device and are deleted from the device at the end of the usage session or when the browser is closed.

8.7. The Data Controller uses the following types of cookies on its websites:

8.7.1. The usage of cookies is necessary for the proper functioning of the websites, in particular for the navigation and use of the features of the websites. By using the site, the visitor acknowledges their use.

8.7.2. Functional cookies are used to make the website more convenient to use, including the ability for the website to remember user preferences (e.g., language settings) and information previously provided by the user on the website.

8.7.3. By using cookies for statistical purposes, the website collects information about the usage of the site, such as the length of different sessions or the parts of the website clicked on by visitors. The Data Controller processes this data for the purpose of improving its services and websites. These statistics do not allow visitors to be identified personally.

8.8. The Controller's websites use Google Analytics third-party cookies for statistical purposes

8.8.1. The html code of the controller's websites may contain links from and to external servers for the purpose of web analytics measurements. Visitors who do not want their activity on the websites to be included in the Google Analytics statistics can opt-out by installing the so-called Google Analytics Opt-out Browser Add-on, which is installed as a browser add-on. You can find out more about the add-on at this link: <https://tools.google.com/dlpage/gaoptout>

Learn more about Google Analytics here:
<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usag>

8.9. Our Sites use the following third-party advertising cookies:

The purpose of advertising cookies is to better understand users' preferences and to display personalized advertising content on the website and on third party websites after they leave the site. The data controller therefore runs remarketing ads on the Facebook and Google advertising systems. These may appear on pages of partner networks of Facebook and Google. They do not contain personal data and are not identifiable.

8.9.1. Further information about the cookies used by Google Ads is available on the following page: <https://policies.google.com/technologies/ads?hl=en-US>

8.9.2. As part of the Facebook Ads service, we use the social networking site's so-called Facebook pixel cookie, which allows you to target visitors to our websites to display ads. The controller uses the Facebook pixel to ensure that embedded Facebook ads are only displayed to Facebook users who may be interested in the controller's services.





Information on the cookies used can be found at this link:
<https://www.facebook.com/help/cookies/update>

8.9.3. Further information on the management and deletion of cookies used on the websites of the data controller is available on the websites of the browsers, depending on the type of browser used by the visitor.

8.10. If the natural person concerned does not consent to the installation of cookies by the data controller on terminal equipment, they are entitled to disable the use of cookies in the terminal equipment settings, in whole or in part.

8.11. The cookies applied on <https://blackcell.hu/> and <https://blackcell.io/> webpages are the following:

Cookie name	Cookie type	Cookie expiration	Purpose of the cookie
_GRECAPTCHA	Essential for operation	5 months and descending	Supplementary cookie.
VISITOR_INFO1_LIVE	Marketing purpose	5 months and descending	The cookie used by YouTube to determine the user's video interface.
YSC	Required to measure performance	End of session	A cookie used by the YouTube video service on pages containing embedded YouTube videos.
_cfduid	Essential for operation	End of session	A cookie used by the content provider "Cloudflare" to detect trusted network traffic, allowing website access, and reducing page load times.
cookieawinfo-checkbox-necessary	Essential for operation	11 months	Cookie notice.
cookieawinfo-checkbox-analytics	Statistic purpose	11 months	Cookie notice.
cookieawinfo-checkbox-functional	Functional	11 months	Cookie notice.
cookieawinfo-checkbox-others	Other	11 months	Cookie notice.





cookie-law-info-checkbox-performance	Required to measure power	11 months	Cookie notice.
viewed_cookie_policy	Essential for operation	11 months	This stores whether the user has accepted cookies or not.
yt-remote-connected-devices	Required to measure power	never	A cookie used by the YouTube video service on pages containing embedded YouTube videos.
yt-remote-device-id	Required to measure power	never	A cookie used by the YouTube video service on pages containing embedded YouTube videos.

9. Social media sites of the Data Controller

9.1. The Facebook site of the Data Controller

9.1.1. The data controller receives the data of the data subjects on Facebook in a public view, therefore the scope of the data processed depends on the settings used by the data subject. The data controller may see the data subject's data on the Facebook page if the data subject follows the page, likes the page, comments, likes photos, or posts, writes a recommendation or review of the page, posts, or uploads a photo, GIF, video to the page, writes a private message to the data controller. The Facebook Privacy Policy is available on the following website operated by Meta Platforms Inc.: www.facebook.com/privacy/policy/

9.2. The LinkedIn site of the Data Controller

9.2.1. The data controller views the data provided by the data subject on LinkedIn in a public view, so the scope of the data processed depends on the settings used by the data subject. The data controller may see the data subject's data on LinkedIn if the data subject follows the page, likes the page, comments, likes photos, or posts, writes a recommendation or review of the page, posts, or uploads a photo, GIF, video to the page, writes a private message to the data controller. The LinkedIn Privacy Policy is available on the following website operated by LinkedIn Inc.: <https://www.linkedin.com/legal/privacy-policy>

9.3. The YouTube page of the Data Controller

9.3.1. The data controller views the data provided by the data subject on YouTube in a public view, so the scope of the data processed depends on the settings used by the data subject. The data controller may see the data subject's data on YouTube when the data subject subscribes to the page, likes the page, comments, likes videos. YouTube's privacy policy can be found on the following website operated by Google Inc.: <https://policies.google.com/privacy?hl=en>





10. In the context of the exclusion of liability, the data subject's attention is drawn to the fact that if they do not provide their own personal data through any of the above-mentioned websites or any other communication channels, the data controller shall not be liable for the processing of such data. It is the data subject's responsibility to obtain the consent for the processing of the personal data provided.
11. In matters not covered by this Privacy Policy, the provisions of the applicable legislation, in particular the General Data Protection Regulation, the e-Privacy Directive, the Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, Act CVIII of 2001 on certain aspects of electronic commerce services and information society services, and Act V of 2013 on the Civil Code shall apply.
12. The data controller will revise this Privacy Policy from time to time, in case of changes in legislation or developments in data protection practices. If the amendment affects the use of the personal data processed, the user will be informed of the changes by e-mail.

