

INLOCK Data Processing Policy

IP Technologies Informatikai Tanácsadó és Fejlesztő Korlátolt Felelősségű Társaság (registered office: 1118 Budapest, Rétköz u. 5. I. emelet, company registration number: 13-09-194391 hereinafter referred to as IP Technologies Kft. provides the platform, www.inlock.io which is used by Income Locker OÜ: registered seat: Harju maakond, Tallinn, Kesklinna linnaosa, Ahtri tänav-12-200, 10151, Estonia, Company Registered Number: 14486259 hereinafter referred to as INLOCK to send newsletters to you as a contact person to a company interested in the activities of the INLOCK platform. In order to allow INLOCK to provide you with the newsletter/data processing service, INLOCK needs to transfer your contact info to IP Technologies Kft.

With regard to the data privacy changes after 25 May 2018, when the General Data Protection Regulation of the European Union becomes applicable to all data control carried out in the territory of the European Union, processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest, which means that no consent would be required from your side. Notwithstanding INLOCK would like to follow the safest practice and would like to obtain your consent for data management for marketing purposes. Please provide INLOCK with your consent as per below. Please note that without your consent, INLOCK will not be able to send you newsletters and event invitations or directly contact you with any marketing activities.

Your voluntary consent to the business related communication covers the following activities:

- *Email marketing (contacting and managing my preferences)*
- *Profiling – analyzing my personal preferences, interests in order to be able to get the targeted offers for my entity*
- *Conducting business activities of INLOCK*
- *Managing sales opportunities for INLOCK*
- *Building my profile by analyzing my personal preferences, behaviours and interests in order to be able to get the targeted content or offer for my entity*

Controller of personal data: IP Technologies Kft.

The period for which the personal data will be processed: The data will be processed until the consent is revoked or in case of the lack of such withdrawal as long as it is necessary in relation to the purposes described above, but no longer than 10 (ten) years from the collection of the data. After the indicated period expires or I request so, or the data controllers become aware of the inaccuracy of my personal data and I refuse or miss to provide my accurate data, the personal data will be permanently deleted. However, I am aware that controller may retain limited scope of my personal data in order to prove compliance with the applicable laws.

The consent is given voluntarily but the processing of my personal data is necessary to fulfil the purposes described here-above. If consent is not granted or I later send a request for rectification or erasure of my data, and withdraw my consent, this will mean that I will have no possibility to participate in marketing or promotional activities or receive any newsletters or offers from INLOCK.

I, as data subject have the right to object to the processing, as well as the right to data portability and the right to obtain a copy of my personal data controlled. All rights described in this paragraph can be enforced by myself, by sending an e-mail request to the authorized data controller, Deloitte Advisory and Management Consulting Private Limited Company to gdpr_request@inlock.io

I also have the right to initiate a court proceeding against the data controller for indemnification and to lodge a complaint with a data protection supervisory authority in the country of my residence in case I consider that the processing of my personal data infringes the applicable laws.

I understand and provide my consent that my personal data is being controlled by INLOCK provider as joint controllers and will be transferred to IP Technologies Kft. as data processor. I also accept that INLOCK might change its platform provider and my data might be transferred to this new provider, subject to the purpose, scope of personal data and other conditions stay the same.