

Privacy policy regarding to get in touch with potential business partners

1. Name of the data controller

Data Controller: RECASH Europe Ltd. (hereinafter referred to as: Data Controller)

Registered address: 3530 Miskolc, Hunyadi János utca 56.

Company register number: 05-09-028450

Tax number: 25434336-2-05

Website: <https://recash.app/>

E-mail: support@recash.app

2. Name of the Data Protection Officer

Data Protection Officer: Smart Specialist Zrt.

Contact information: support@recash.app

This privacy policy gives information on the controlling of personal data submitted in the course of signing up to get in touch with potential business partners either at <https://recash.app/> (hereinafter referred to as: 'Website') or through the RECASH application (hereinafter referred to as: 'Application'), both operated by the Data Controller.

3. General piece of legislation serving as the basis for the data controlling process

- 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).

4. Explanatory notes

The following explanatory notes were defined based on the GDPR:

Personal data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Consent of the data subject: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Data processing: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Recipient: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

Data processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

5. Data processing during subscription to the newsletter

Purpose of data processing	Get in touch with potential business partners via phone or email
Legal grounds for processing the data	Article 6, 1 (a) of the GDPR: consent of the data subject
The categories of data subjects	Natural persons above the age of 18 downloading the application
Type of personal data to be processed	work email; work phone; first name; last name; company name; job title
Period of retention of the data	30 days after the User deletes his or her registration.
Transfer of the data	Data transfer pursuant to Articles 44-49 of the GDPR shall not take place.
Recipients	We transfer the newsletters with the help of GetResponse (GetResponseSp. z o.o. Arkonska 6, A3, 80-387 Gdansk, Poland, tax number: 9581468984).

6. Rights in connection with data processing

The rights set out in the GDPR are guaranteed for the data subjects by the Company, that is the Data Controller. These rights are the following:

- **Rights of information (rights of prior information):** the data controller is obliged to give appropriate information to the data subject in connection with the route and circumstances of the processing of their personal data (GDPR paragraph (60) of the preamble),
- **Right of optional withdrawal of consent** given by you in order to stop the processing of data taking place based on your consent. The withdrawal of such consent shall not

affect the lawfulness of processing based on consent before its withdrawal (Article 7 of the GDPR).

- **Right of access** to information on data processing and the data that are being processed (Article 15 of the GDPR),
- **Right to rectification** of inaccurate personal data or **right to have incomplete personal data completed** (Article 16 of the GDPR),
- **Right to have the personal data erased**, or – if the personal data have been made public – the right that the controller informs other controllers which are processing the personal data that the data subject has requested the erasure **/right to be forgotten/** (Article 17 of the GDPR),
- Right to request the **restriction** of processing (Article 18 of the GDPR),
- The data subject's right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller **/right to data portability/** (Article 20 of the GDPR),
- If data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or on grounds of the legitimate interests of a controller or a third party, the data subject shall, nevertheless **have the right to object** to the processing of any personal data relating to his or her particular situation (Article 21 of the GDPR),
- **Right to lodge a complaint with a supervisory authority**, where you consider that the data processing infringes the provisions of the GDPR (Article 77 of the GDPR).

7. How to exercise your rights in connection with data processing

In connection with exercising data protection rights, data subjects may turn to the Data Controller or the Data Protection Officer using the contacts provided in Sections 1. and 2., respectively.

In the case of an infringement of the data subject's right to the protection of personal data, the data subject may seek legal remedy with the following Authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

postal address: 1530 Budapest, Pf.: 5.

telephone number: +36 (1) 391-1400

webpage: www.naih.hu

e-mail: ugyfelszolgalat@naih.hu

In case the data subject experiences that the processing of his or her personal data takes place unlawfully, then they can file a civil case against the Data Controller. The decision of the case belongs to the jurisdiction of the regional court. Such civil case – as chosen by the data subject – can also be filed at the regional court based on the place of residence of the data subject. The acting court based on the registered seat of the Data Controller is the Miskolc Regional Court (3525 Miskolc, Dózsa György út 4., +36-46/353-411, +36-46/815-200)

This policy is reviewed upon each modification of the webpage and also at specified intervals. The all-time effective policy is accessible at <https://recash.app/privacy-policy.html>.