

Privacy Policy

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| <p>1. Who is handling your data?</p> | <p>The data controller: company name: Trade Innovation Ltd. registered seat: H-1123 Budapest, Csőrsz utca 49-51. 3rd flor tax number: 23492875-2-43 company registry No.: Cg.01-09-968152 Court of Registry: Municipal Court of Budapest (Hungary) (in Hungarian: Fővárosi Törvényszék Cégbírósága (Magyarország)) e-mail: support@profitmanager.io (hereinafter: Trade Innovation)</p> |
| <p>2. Which personal data is under control?</p> | <p>Trade Innovation controls the following personal data: <u>In case of users who are natural persons:</u></p> <ul style="list-style-type: none"> - name, - address - e-mail - telephone number <p><u>In case of contact persons acting on behalf of legal entity users:</u></p> <ul style="list-style-type: none"> - name and title of the contact person - office e-mail |
| <p>3. What is the purpose of processing your personal data?</p> | <p>Your personal data is processed for the purposes of performing the services of the cryptocurrency sales platform available at www.profitmanager.io operated by the data controller and for issuance of the invoices in connection with the usage of the services.</p> |
| <p>4. What is the legal title of processing your personal data?</p> | <p><u>In case of users who are natural persons</u></p> <p>Data processing in respect of user's name, e-mail address, telephone number and address/shipping address is needed for the performance of the agreement concluded between the user and Trade Innovation where one of the contracting parties is the user (under Article 6(1)b) of the GDPR);</p> <p><u>In case of the contact persons acting on behalf of legal entity users</u></p> <p>In case of legal entity users and the contact persons acting on their behalf, the parties have a legitimate interest in allowing data processing of personal data of the contact person (under Article 6(1)f) of the GDPR) and the assessment of the interest involved shows that the contact person's personal interests, fundamental rights, freedoms are not overriding. When making the assessment, the data controller considered that it is the legitimate interest of both parties to ensure that liaising is fast, adaptive, and efficient in connection with the performance of their agreement regarding any eventual queries. In order to ensure such manner of liaising, the processing of the contact person's personal data is indispensable. It is the legal obligation of contact persons by virtue of their employment or other such relationship to contribute to the performance of the agreement concluded</p> |

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| | <p>between the user and the data controller and shall therefore make available certain personal data to the extent necessary therefor. Such data handling does not restrain the contact person's informational self-determination beyond reasonability as such personal data is not used for any other purpose, including any marketing activity.</p> |
| <p>5. What is the duration of the data processing?</p> | <p>The duration of the data processing in respect of user's</p> <ul style="list-style-type: none"> a) name and address is 8 years as of the termination of the contractual relationship based on Articles 168-169 of the Act C of 2000 on Accounting; b) e-mail address and telephone number – deleted immediately upon termination of the contractual relationship. |
| <p>6. What are your rights in connection with your personal data?</p> | <p>Pursuant to the provisions 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 (GDPR)</p> <ul style="list-style-type: none"> a) You are entitled to access the personal data pertaining to you and you may also require information as to whether Trade Innovation processes your data and if so, what are the personal data controlled by them. You are entitled to access the personal data controlled by us and pertaining to you and you may request to receive a copy thereof. We will ensure that you receive any information about, access to, and the copy of such personal data without delay within reasonable time and free of charge. If you wish to receive additional copies, you may be required to pay a fee calculated on the basis of administrative expenses. b) You are entitled to request the rectification, completion, or erasure of inaccurate or incomplete personal data pertaining to you which we will do without delay within reasonable time and free of charge. Furthermore, we will notify any other recipient to whom the personal data have been disclosed about the rectification or erasure of data. c) We will immediately examine the legal title of controlling the data in case a request for erasure is made and if the legislative conditions for erasure are met, we will erase the data without delay. We note that certain statutory provisions (in particular the rules relating to accounting and invoicing) may prescribe an obligation to control your personal data for purposes and in the manner and for the duration described therein and may prescribe the forwarding and/or maintaining of said personal data and therefore we cannot comply with any eventual request for erasure if we are expressly subject to the obligation to control and forward such data pursuant to the provisions of law. d) You are entitled to request restriction of processing of your personal data if you are contesting the accuracy of data |

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| | <p>processing or in case of an alleged unlawful data processing you oppose to the erasure of the personal data, or Trade Innovation no longer needs the data in question, or if you exercised your right to object against data processing. In case you make a request for restriction of data processing, we will immediately inform you of any and all restrictive measures we take and we will notify any other recipients about the your request of restriction of data processing.</p> <p>e) You are entitled to request information from Trade Innovation as to whom notification have been disclosed about the rectification, erasure or the restriction of data processing which will be made available to you without delay within reasonable time and free of charge.</p> <p>f) You are entitled to request that your personal data be sent to you in a structured, commonly used, machine-readable and interoperable format, or to transmit it to another controller (if such is technically possible).</p> <p>g) You are entitled to request the erasure of your personal data at any time regarding your contact details if you fall into the category described in Section 4 above, by a request addressed to the contact information detailed in Section 7 below.</p> <p>h) You may object against the processing of your personal data by Trade Innovation as the contact person of a legal entity described based on legal grounds herein and by notifying the contact addresses listed in Section 7 below.</p> |
| 7. What are the contact details of the data controller? | <p>If you have any questions, complaints or queries regarding your rights, you can reach the data controller at the e-mail address support@profitmanager.io or by sending a postal letter addressed to Trade Innovation Korlátolt Felelősségű Társaság at H-1123 Budapest, Csőrsz utca 49-51. 3rd floor</p> |
| 8. Who are the recipients of your personal data? | <p>The data controller does not forward your personal data to third parties with the exceptions of data forwarding to third parties pursuant to an obligation prescribed by the provisions of law, such as to our partners performing accountant services or to the tax authority.</p> |
| 9. Who are the data processor engaged by us? | <p>company name: Trade Innovation Ltd. registered seat: H-1123 Budapest, Csőrsz utca 49-51. 3rd floor company registry No.: 01-09-968152 tax number: 23492875-2-43 services: IT services</p> <p>company name: Amazon Web Services, Inc registered seat: 410 Terry Avenue North, Seattle, WA 98109-5210 services: https://aws.amazon.com/compliance/data-privacy/</p> |

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| | Accounting: KONTÓ MIX Számviteli Tanácsadó Bt. Székhelye: 1136 Budapest, Balzac utca 8-10. fsz. 7.a. adószáma: 21922613-1-41 |
| 10. What are the legal remedies available to you? | If you have any concerns regarding the lawful nature of data processing or if you have any complaints, you can initiate the procedure of the National Authority for Data Protection and Freedom of Information (H-1125 Budapest, Szilágyi Erzsébet fasor 22/c., postal address: 1534 Budapest, Pf.: 843, website: www.naih.hu , tel.: +36 (1) 391-1400, fax: +36 (1) 391-1410, central e-mail address: ugyfelszolgalat@naih.hu) and you may also submit your concerns to the courts, either to the Municipal Court (1055 Budapest, Markó u. 27.) competent to proceed pursuant to the registered seat of the data controller or the court competent pursuant to your personal place of residence or stay. |

Representations regarding the processing of personal data

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| <i>Representation on the receipt of information about the data processing</i> | I hereby represent that I received unequivocal and detailed information about the processing of my personal data before such processing commenced which I understood and accepted. |
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