

Introduction

Quantum Signature Solutions Kft is committed to protecting our customer privacy and takes its responsibility regarding the security of customer information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- And how we comply with the data protection rules.
- All personal data is collected and processed in accordance with Hungarian and EU data protection laws.

Data Controller

“Quantum Signature Solutions Kft” (referred to as “we”, “us”, “our” or “Quantum Signature Solutions Kft” in this policy) in this policy primarily refers to Quantum Signature Solutions Kft., as the main operating company. Quantum Signature Solutions is the “data controller” of all personal information that is collected and used about Quantum Signature Solutions Kft customers for the purposes of [the Hungarian Data Protection Act 2018]. Quantum Signature Solutions Kft is registered in Hungary with registration number 01-09-274173 and registered offices at Quantum Signature Solutions Kft, 1181 Budapest, Ulloi ut 495 Hungary.

What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your access to our website.

We may collect personal data from you when you purchase our products (either directly or indirectly through our trusted third party partners), use our website and other websites accessible through our website, participate in a survey or competition, or when you contact us.

Specifically, we may collect the following categories of information:

- a. Name, home address, e-mail address, telephone number, credit/debit card or other payment details;
- b. Information about your purchases of our trusted partners’ products and services;

- c. Information about your use of our website;
- d. The communications you exchange with us or direct to us via letters, emails, chat service, calls, and social media.

Personal details about your physical or mental health, alleged commission or conviction of criminal offences are considered “sensitive” personal data under applicable data protection laws. We will process any such data only if you have given your explicit consent, or you have deliberately made it public.

What do we use your personal data for, why and for how long

Your data may be used for the following purposes:

- a. Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to your registration in the software activation database and registration in the online training database;
- b. Contacting you in the event of delivery delay, we send you communications about the services you have asked for and any changes to such services. These communications are not made for marketing purposes and cannot be opted-out of;
- c. Credit or other payment card verification/screening: we use your payment information for accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities;
- d. Administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, customer surveys, maintenance and development, or in order to deal with a dispute or claim. Note that we may perform data profiling based on the data we collect from you for statistical and marketing analysis purposes. Any profiling activity will be carried out with your prior consent only and by making best endeavours to ensure that all data it is based on is accurate. By providing any personal data you explicitly agree that we may use it to perform profiling activities in accordance with this Privacy Policy;
- e. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;
- f. Customer Services communications: we use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us;
- g. Provide tailored services: we use your data to provide information we believe is of interest to you, and to personalize the services we offer to you, such as special offers on our products.
- h. Marketing: from time to time we will contact you with information regarding special promotions via e-communications. You will be given the opportunity on every e-communication that we send you to indicate that you no longer wish to receive our direct marketing material.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation;
- You have consented to us using your personal data (e.g. for marketing related uses);

Only children aged 16 or over can provide their own consent. For children under this age, consent of the children's parents or legal guardians is required.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimize over time the personal data that we use, and if we can anonymize your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

Security of your personal data

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Hungarian and EU law on data protection rules.

International Data Transfer

Quantum Signature Solutions Kft operates businesses in multiple jurisdictions, some of which are not located in the European Economic Area (EEA), such as USA and Canada. While countries outside the EEA do not always have strong data protection laws, we require all services providers to process your information in a secure manner and in accordance with Hungarian and EU law on data protection. We utilise standard means under EU law to legitimize data transfers outside the EEA.

Sharing your personal data

Your personal data may be shared with other companies within the Quantum Signature Solutions Kft group.

We may also share your personal data with the following third parties for the purpose described in this Privacy Policy:

- a. Government authorities, law enforcement bodies
- b. Trusted representatives through which through you can purchase our products;
- c. Trusted service providers we are using to run our business such as online training providers assisting our customers with their education. E-mail marketing service providers assisting our marketing team with running customer surveys and providing targeted marketing campaigns;
- d. Credit and debit card companies which facilitate your payments to us, and anti-fraud screening, which may need information about your method of payment
- e. Legal and other professional advisers, law courts and law enforcement bodies in all countries we operate in in order to enforce our legal rights in relation to our contract with you;

Data Protection Officer

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this policy. You have the right to make a complaint at any time to a supervisory authority.

Your Data Protection Rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Object to automated decision-making including profiling**, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **Withdraw consent.** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.