

# PRIVACY POLICY AND STATEMENT

Effective: from 22 October 2021

The Privacy Policy is



**ADATLAKAT**  
POWERED BY CONSACT

prepared

## CONTENT

1.	Data Controller .....	3
2.	Privacy Statement.....	3
3.	Concepts .....	4
4.	Basic principles of data processing .....	5
5.	Managed data.....	6
5.1	Registration.....	6
5.2	Authentication .....	6
5.3	Bonus program .....	7
5.4	System Messages.....	7
6.	Security of data.....	7
7.	Transmission and transfer of data .....	8
8.	Rights of data subjects.....	8
8.1	Right to prior information .....	8
8.2	Right of access .....	8
8.3	Right to rectification .....	9
8.4	Right to erasure (“right to be forgotten”).....	9
8.5	Right to restriction of processing .....	10
8.6	Right to notification relating to the rectification or erasure of personal data or to the restriction of processing.....	10
8.7	Right to data portability .....	11
8.8	Right to object .....	11
8.9	Automated decision-making and profiling.....	11
8.10	The data subject's right to information about the personal data breach .....	12
8.11	The data subject's right to complaint with the supervisory authority .....	12
8.12	Right to an effective judicial remedy against a supervisory authority .....	12

## 1. Data Controller

Name of Data Controller:	Millionstarter Investor Company Bt.
Headquarters:	8440 Herend, Rózsa utca 29.
Representative:	Renátó Bándli
Tax number:	27068665-2-19
Company registry number:	19 06 510081
Person responsible for data processing activities:	Renátó Bándli
E-mail:	hello@millionstarter.com
Phone:	+36 30 147 24 24
Website:	<a href="https://millionstarter.com">https://millionstarter.com</a> <a href="https://millionstarter.com">app.millionstarter.com</a>

## 2. Privacy Statement

This Privacy Policy and Statement (hereinafter: Privacy Policy) of Millionstarter Investor Company Bt. (hereinafter: Data Controller) contains the rules for data processing arising from the use of the [app.millionstarter.com](https://millionstarter.com) website, data protection and data management principles, as well as information on data processing.

When you use our website, you provide your personal data. We process this data with the utmost care and in accordance with the requirements of the law, and in any case we strive to meet your needs and expectations regarding data processing. We always take special care when handling your data and protect your data from unauthorized access. We consider this a priority.

Legislation defining our data processing activities:

- 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation — GDPR), hereinafter: Regulation)
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Info Act)
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (“Ecommerce Act”)
- Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Economic Advertising
- Act LIII of 2017 - Prevention and Prevention of Money Laundering and Terrorist Financing

The purpose of the Privacy Policy is to describe the rights and obligations of persons registering and purchasing items on our website and visiting our websites in relation to data transfer, data management, data protection, the scope of the data processed by us, the principle and methods of processing data, purpose and legal basis and its duration.

### 3. Concepts

**GDPR:** 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 Regulation 95/46/EC (General Data Protection Regulation)

**Personal data:** any information relating to the data subject, such as an identifier, name, number, location data, online identifier or physical, physiological, genetic, mental, economic, cultural or social data on the identity of the person.

**Specific data:** personal data referring to racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic and biometric data for the unique identification of natural persons, health data and personal data on the sexual life or sexual orientation of natural persons.

**Processing:** any operation or a set of operations carried out on personal data or files, irrespective of the procedure used, in particular collection, recording, organisation, structuring, storing, altering, altering, transforming, use, query, transmission, disclosure, harmonisation or linking, blocking, erasure and destruction, preventing access to and re-use of data, taking photographs, audio or images, and recording of physical characteristics (e.g., fingerprints or palm prints) capable of identifying them.

**Data controller:** the natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes and means of the processing of personal data, takes and executes decisions with regard to the processing or has the processor execute them.

**Data processor:** a natural or legal person or entity without legal personality who processes personal data on behalf of the controller.

**Data subject:** a natural person identified or identifiable, directly or indirectly, on the basis of one or more factors, on the basis of any specific personal data. An identifiable natural person can be identified directly or indirectly, in particular by means of an identifier such as a name, number, location data, online identifier or one or more factors.

**Data transfer:** making personal data available to a specific third party. Transfers to EEA Member States and bodies of the European Union shall be deemed to take place within the territory of Hungary.

**Data deletion/erasure:** making data unrecognizable by means of deletion of content or equivalent results.

**Personal data breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**EEA Member State:** a Member State of the European Union and another State party to the Agreement on the European Economic Area, and a State whose nationals enjoy the same status as nationals of a State party to the Agreement on the European Economic Area under an international treaty concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area.

**Third country:** any State that is not a Member State of the EEA.

**NAIH:** National Authority for Data Protection and Freedom of Information, GDPR supervisory authority for Hungary.

#### 4. Basic principles of data processing

Personal data:

- is managed lawfully and fairly and in a transparent manner to the data subject (“legality, fairness and transparency”);
- must be collected only for specified, clear and legitimate purposes (“purpose limitation”);
- be adequate and relevant for the purposes of the processing and limited to what is necessary (“data conservation”);
- we will take all reasonable steps to ensure that the data is accurate and up to date, and to promptly delete or rectify any personal data that is inaccurate for the purposes for which it is processed (“accuracy”);
- is stored in a form which allows the identification of data subjects only for the time necessary to achieve the purposes for which the personal data are processed (“limited storage”);
- is processed in a way that ensures adequate security of personal data, including the protection against unauthorised or unlawful processing, accidental loss, destruction or damage (“integrity and confidentiality”), by using appropriate technical or organisational measures.

As Data Controller, we are responsible for compliance with the above, and if necessary we certify compliance (“accountability”).

## 5. Processed data

### 5.1 Registration

**Data subjects:** every natural person who registers on our website. The

**Purpose of data processing:** Creating and managing a user account.

Data Type	Legal basis	Retention period
name	Point a) of Section 1 of Article 6 of GDPR	Until withdrawal of consent
e-mail address		
password		

#### **Process of data processing:**

We send feedback on the registration by e-mail to the e-mail address provided, in which we provide information about the authentication process.

The above information is optional, but you cannot create a user account if you do not provide this information. You may withdraw your consent at any time without giving reasons, but this does not affect any previous processing based on your consent. If you register at the invitation of a friend, your friend can see in their account that you are registered, based on your name, registration date and based on the bonus you received based on your purchase, he/she can make conclusions on the amount of tokens you have purchased.

### 5.2 Authentication

**Data subjects:** any natural person who wishes to make a purchase on our website and to this end provide data for authentication.

**Purpose of data processing:** User identification, authentication, contact.

Data Type	Legal basis	Retention period
name	Point c) of Section 1 of Article 6 of GDPR legal fulfilment of the obligation (Act LIII of 2017 - Prevention and Prevention of Money Laundering	Eight years after the termination of the business relationship or the execution of the transaction order.
date of birth		
place of residence		
Copy of passport/ID/driver's license		
photograph		
phone number	Point a) of Section 1 of Article 6 of	Until the withdrawal of the consent.
telegram username		

#### **Process of data processing:**

Only the person identified in accordance with Act LIII of 2017 on Prevention and Combating of Money Laundering and Terrorist Financing is entitled to purchase Token on our website (AML/KYC Identification). To do this, you must complete an authentication process for each user after registration.

The above information is mandatory under Act LIII of 2017 on Prevention and Combating of Money Laundering and Terrorist Financing.

The information requested for the purpose of contact is optional, but we will not be able to contact the user without it. You may withdraw your consent at any time without giving reasons, but this does not affect any previous processing based on your consent.

### 5.3 Bonus Program

**Data subjects:** Any natural person registered on our website who participates in our bonus program.

The purpose of data processing: Credit of bonuses

Data Type	Legal basis	Retention period
Acquaintance contact	Point a) of Section 1 of Article 6 of	Until withdrawal of consent

**Process of data processing:**

When crediting bonuses earned in the Bonus Program, we know who you have invited.

You may withdraw your consent at any time without giving reasons, but this does not affect any previous processing based on your consent.

### 5.4 System Messages

**Data subjects:** Any natural person who registers on our website.

**Purpose of data processing:** Sending system messages.

Data Type	Legal basis	Retention period
E-mail address	Point f) of Section 1 of Article 6 of GDPR	1 months after the deletion of the user account

**Process of data processing:**

We occasionally send system messages to our users on issues related to the operation of the website (e.g., technical conditions, exchange rate changes).

We carried out a balancing of interests test on legitimate interest, which resulted in a finding that the processing is lawful.

The Data subject has the opportunity to object to the processing of data (see Point 8.8).

System messages are sent using Mailchimp.com.

## 6. Security of data

We use technical and organisational measures and procedures to ensure the security of the personal data we process.

We will take appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, accidental destruction or damage and inaccessibility due to changes in the technology used.

Personal data is only accessible to those of our employees who need to know them in order to perform their tasks.

To ensure the security of your data

- during the design and operation of the IT system, we assess and take into account the potential risks, striving to reduce them continuously
- monitor the emerging threats and vulnerabilities (such as computer viruses, computer burglaries, denial of service attacks, etc.) to take timely measures to avoid and eliminate them
- protect IT tools and information handled on paper against unauthorized physical access and environmental impacts (e.g., water, fire, electrical surges)
- by monitoring our IT system, we take care of the detection of possible problems and events
- reliability is an essential criterion for the selection of service providers involved in the operation

## 7. Transmission and transfer of data

Personal data of natural persons using our websites will only be transferred to or disclosed to our partners and processors as defined in Section 5 and this section, and to the authorities upon request.

We have always concluded a written agreement covering the details of data processing with the partners or processors involved in our data processing activities.

No transfer of data to a third country or to an international organisation shall take place. Our contractual partners involved in data management:

- GoDaddy.com (Server, hosting service)  
Registered seat: 2155 E. GoDaddy Way, Tempe, AZ 85284 USA  
Tax Code: EIN 46-5769934
- Ilmo Akta Accountancy Office Ltd., Kiliti Mónika Accountant (Accounting)  
Headquarters: 1223 Budapest, Nagytétényi út 190. Company  
registration No.: 01 09 354925  
Tax number: 27341221-2-43

## 8. Rights of data subjects

### 8.1 Right to prior information

The data subject shall have the right to receive information in writing from the Controller in a transparent, understandable, clear and easily accessible manner before starting the processing of personal data. The information shall be provided to the Controller at the latest at the time of obtaining the personal data.

If the controller intends to carry out further processing of personal data for purposes other than the purpose for which they were collected, it shall inform the data subject of that different purpose and of any relevant additional information prior to further processing.

### 8.2 Right of access

The data subject shall have the right to receive feedback from the controller as to whether his personal data are being processed and, if such processing is in progress, he shall have the right to obtain access to the personal data and to the following information:



- a) the purposes of data management
- b) the categories of personal data concerned
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular the recipients in third countries or international organisations;
- d) where applicable, the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period
- e) the right of the data subject to request from the controller the rectification, erasure or restriction of processing of personal data relating to him and to object to the processing of such personal data;
- f) the right to lodge a complaint addressed to a supervisory authority;
- g) where the data were not collected from the data subject, any available information on their source;
- h) the fact of automated decision-making, including profiling, and, at least in these cases, understandable information on the logic used and the significance of such processing and the likely consequences for the data subject.

The Data controller shall provide a copy of the personal data subject to processing to the data subject. The Data controller may charge a reasonable fee based on administrative costs for further copies requested by the data subject. Where the data subject has submitted an application by electronic means, the information shall be provided in a widely used electronic format, unless otherwise requested by the data subject. The right to request a copy must not adversely affect the rights and freedoms of others.

### 8.3 Right to rectification

The data subject has the right to rectify inaccurate personal data concerning him at his request without undue delay. Taking into account the purpose of the processing, the data subject shall have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

### 8.4 Right of cancellation ("right to forget")

The data subject shall have the right to delete the personal data concerning him without undue delay at his request and the Controller shall be obliged to delete the personal data concerning the data subject without undue delay if one of the following reasons applies:

- a) personal data are no longer required for the purpose for which they were collected or otherwise processed
- b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject objects to the processing of data and there are no legitimate grounds for the processing of data;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased in order to comply with a legal obligation imposed by Union or Member State law applicable to the controller;
- f) personal data were collected in connection with the provision of information society services.

If the Data controller has disclosed the personal data and is obliged to delete it under the foregoing, it shall take reasonable steps, including technical measures, taking into account the available technology and the costs of implementation, in order to inform that the data subject has requested the deletion of links to the personal data in question or copies or copies of such personal data.

The above shall not apply where processing is necessary:

- a) for the purpose of exercising the right to freedom of expression and information;
- b) to fulfil an obligation under Union or Member State law applicable to the controller to process personal data, or to carry out a task in the public interest or in the exercise of a public authority conferred on the controller;
- c) on the basis of public interest in the field of public health;
- d) for archiving purposes in the public interest, for scientific and historical research purposes or for statistical purposes, where the right to erasure is likely to make this processing impossible or seriously jeopardise; or
- e) for the establishment, exercise or defence of legal claims.

#### 8.5 Right to restrict data processing

The data subject has the right to restrict the processing at his request if one of the following is fulfilled:

- a) - the data subject contests the accuracy of the personal data, in which case the restriction relates to the period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the deletion of the data and instead requests a restriction on their use;
- c) the Data Controller no longer needs the personal data for the purpose of data processing, but the data subject requests them in order to make, enforce or protect legal claims; or
- d) the data subject has objected to the processing (in this case, the restriction applies for the period until it is established whether the legitimate reasons of the controller take precedence over the legitimate reasons of the data subject).

Where processing is restricted on the basis of the foregoing, such personal data, except for storage, shall be subject only with the consent of the data subject, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for the purposes of the Union, or it may be dealt with in the important public interest of a Member State.

The Data controller shall inform the data subject at whose request the processing has been restricted in advance of the lifting of the restriction of processing.

#### 8.6 Right to notification relating to the rectification or erasure of personal data or to the restriction of processing

The data subject has the right to request the Data Controller to provide the recipients to whom their personal data have been disclosed. The Data Controller shall inform all recipients to whom the personal data have been disclosed of the rectification, erasure or restriction of processing of personal data, unless this is impossible or requires disproportionate effort.

### 8.7 Right to data portability:

The data subject shall have the right to receive personal data concerning him and which he has made available to the Data Controller in a structured, widely used, machine-readable format and shall be entitled to transmit such data to another controller if:

- a) the processing is based on consent or contract; and
- b) data processing is carried out in an automated manner.

In exercising the right to portability of data, the data subject shall have the right to request, where technically feasible, the transfer of personal data between data controllers.

The exercise of the data subject's right to data portability should not adversely affect the rights and freedoms of others, where this is the case, the Data Controller shall exercise the right to data portability without disclosure of personal data backed up by this fact, of which reasoned information is sent to the data subject.

### 8.8 Right to protest

The data subject shall have the right to object at any time for reasons relating to his or her own situation to the processing necessary for the performance of a task in the public interest or within the framework of the exercise of a public authority vested in the controller, or by the controller or by a third party against the treatment of its legitimate interests, including profiling based on those provisions. In this case, the Data Controller may no longer process the personal data unless the Data Controller proves that the processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or which are legal claims, enforce or defence.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data relating to him for that purpose, including profiling, insofar as it relates to direct marketing.

If the data subject objects to the processing of personal data for the purposes of direct marketing, the personal data may no longer be processed for that purpose.

### 8.9 Automated decision-making and profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which would have legal effects or would similarly significantly affect him. This does not apply if the decision

- a) necessary for the conclusion or performance of a contract between the data subject and the data controller;
- b) is made possible by Union or Member State law applicable to the controller, which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- c) is based on the explicit consent of the data subject.

In the cases referred to in Points a) and c), the Data Controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention by the Data Controller, express his position and submit an objection to a decision.

#### 8.10 The data subject's right to information about the personal data breach

The data subject shall have the right to be informed of a personal data breach occurring in the Data Controller where the personal data breach is likely to entail a high risk to the rights and freedoms of natural persons.

#### 8.11 The data subject's right to complaint with the supervisory authority

Without prejudice to other administrative or judicial remedies, each data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which he has his habitual residence, place of work or where the alleged infringement is situated, where the data subject considers that he or the processing of personal data in violation of the Regulation.

The supervisory authority to which the complaint has been lodged shall inform the client of the procedural developments in relation to the complaint and the outcome thereof, including that the client is entitled to a judicial remedy.

Hungarian Member State Supervisory Authority:

National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf.: 9., Headquartered: 1055 Budapest, Falk Miksa utca 9-11., homepage: [www.naih.hu](http://www.naih.hu), phone: 06-1-391-1400, email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

#### 8.12 Right to an effective judicial remedy against a supervisory authority

Without prejudice to other administrative or non-judicial remedies, every natural or legal person shall be entitled to an effective judicial remedy against a legally binding decision of the supervisory authority concerning him.

Without prejudice to other administrative or non-judicial remedies, each data subject shall have the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments or its outcome.

Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

These rights can be exercised by the data subjects in writing or by prior agreement using the contact details provided below. We will endeavour to respond to all requests as soon as possible and within a maximum of 15 working days.

Contact details for the exercise of rights:

- By postal letter: 8440 Herend, 29 Rózsa Street
- Email: [hello@millionstarter.com](mailto:hello@millionstarter.com)
- Personally: as agree via phone number +36 30 147 24 24.

We cannot disclose personal information by phone as we cannot identify the caller.