

## **PRIVACY POLICY OF FREEASY KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG**

This privacy policy (“**Policy**”) explains how **FREEASY Korlátolt Felelősségű Társaság** (concise name: FREEASY Kft.; registered seat: 9023 Győr, Körkemence utca 8., Hungary; registered at the Metropolitan Court of Győr as Court of Registry under the registration number: 08-09-031604; e-mail address: [hello@briefly.work](mailto:hello@briefly.work); hereinafter: “**Company**”, “**Data Controller**” or “**Briefly**”) processes personal data collected from its users (hereinafter: “**You**” or “**Data Subject**” or “**User**”) using the Company’s website located at <http://www.briefly.work> (hereinafter: “**Website**”) as a freelancer (hereinafter: “**Freelancer**”) when registering (hereinafter: “**Freelancer Registration**”), the application of the sole proprietors as a project manager (hereinafter: “**Project Manager Application**”; the applying person hereinafter: “**Project Manager**”), furthermore when companies and natural persons (hereinafter: “**Client**”) post a project as a principal (hereinafter: “**Project Posting**”) or subscribing for the Company’s newsletter (hereinafter: “**Newsletter**”) and by sending feedback to the Company via a regular form published on the Website (hereinafter: “**Form**”).

The Policy further states the rights and obligations and other essential provisions related to the process of the personal data. The present Policy forms an integral part of the Company’s General Terms and Conditions (hereinafter: “**GTC**”), therefore, the definitions specified in the GTC shall also be applicable to the present Policy.

The processing and collecting of personal data by Data Controller shall be in harmony with the directly applicable laws of the European Union and the provisions of the Hungarian laws in effect. In case of personal data processing, the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: “**GDPR**”), the Act CXII of 2011 on the Right to Informational Self-determination and Freedom of Information, the Act XLVIII of 2008 on the Essential Conditions and Certain Limitations of Business Advertising Activity, the Act CVIII of 2001 on certain aspects of information society services, furthermore the recommendations and the data protection practice of the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: “**NAIH**”) and the recommendations of the Article 29 Data Protection Working Party, furthermore the recommendations of Article 68 of the GDPR European Data Protection Board shall apply.

As referred above, the Company is the data controller of each data, that is considered to be personal data and received by the Data Controller during the Freelancer Registration, the Project Manager Application, the Project Posting, and when using the Newsletter service or filling the Form.

The Company is dedicated to the protection of the personal data, therefore, will keep confidential the personal data received and take all necessary steps to secure data processing.

### **1 DEFINITIONS**

The following definitions are determined according to the GDPR:

- 1.1 ‘**personal data**’: shall mean 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;

- 1.2 **‘consent’**: shall mean any freely given, specific, informed and unambiguous indication of the will of the Data Subject 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;
- 1.3 **‘data controller’**: shall mean 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 European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 1.4 **‘data processing’**: shall mean 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;
- 1.5 **‘data processor’**: shall mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller;
- 1.6 **‘third party’**: shall mean a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- 1.7 **‘personal data breach’**: shall mean a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 1.8 **‘recipient’**: shall mean a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with European Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 1.9 **‘supervisory authority’**: shall mean one or more independent public authorities provided by each Member State which is responsible for monitoring the application of the GDPR in order to protect the fundamental rights and freedoms of natural persons in relation to processing and to facilitate the free flow of personal data within the European Union;
- 1.10 **‘supervisory authority concerned’**: shall mean a supervisory authority which is concerned by the processing of personal data because: a) the controller or processor is established on the territory of the Member State of that supervisory authority; b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or c) a complaint has been lodged with that supervisory authority.

## 2 **PERSONAL DATA COLLECTED BY THE COMPANY**

The information we gather from Users enable us that the Users, Project Managers and Freelancers can register on the Website, furthermore to personalize and improve our services.

The Company solely collects and processes Your personal data for the purposes specified in the present Policy, and ensures that every stage of the data processing will be in accordance with the purposes of the data processing.

## **2.1 Information You provide to the Company**

### **2.1.1 Personal data provided by the Freelancer**

In order to register on the Website as a Freelancer specified under section 7.1.2 of the GTC the Company processes Your following personal data:

- First and last name,
- e-mail address,
- phone number,
- all personal data contained in the portfolio,
- the types of the projects undertaken, and the main expertise (specialty),
- written introduction,
- place and date of birth,
- mother's maiden name,
- sole proprietor data (registration number, registered seat, tax number),
- Barion Wallet data,
- portrait picture,
- period of experience.

The Data Controller informs you that it is not required for the given e-mail address to contain personal data, so for example Your name. You can independently decide on whether You give an e-mail address that contains information on Your identity.

### **2.1.2 During Project Manager Application**

If according to section 7.2 of the GTC You create a Project Manager account on the Website, the Company processes Your following personal data:

- First and last name,
- e-mail address,
- phone number,
- all personal data contained in the portfolio,
- the types of the projects undertaken, and the main expertise (specialty),
- written introduction,
- place and date of birth,
- mother's maiden name,
- sole proprietor data (registration number, registered seat, tax number),
- Barion Wallet data,
- portrait picture,
- period of experience.

### **2.1.3 During Project Posting**

In case of a Project Posting on the Website according to section 8 of the GTC, the Company processes Your following personal data:

**(A) If You posted the project as a natural person or sole proprietor:**

- First and last name,
- e-mail address,
- phone number,
- project name,
- purpose of the project,
- deadline of the project,
- duration of the project,
- budget of the project.

**(B) If You posted the project as a representative of a legal entity:**

- First and last name,
- if the given e-mail address contains Your name, in that case the e-mail address,
- if the given phone number is not the main phone number of the legal entity You represent, in that case the phone number.

**2.1.4 When using the Newsletter service**

If You sign up for our Newsletter, then in order to provide the Newsletter services the Company processes Your following personal data:

- First and last name,
- e-mail address.

**2.1.5 When completing the Form**

If You send a feedback to the Company by completing the Form, the Company processes Your following personal data:

- e-mail address,
- in case of correspondence all personal data You provide.

**2.2 Information Collected Automatically:**

By visiting the Website of the Data Controller, due to the technical operation the starting and end date of the visit of the User is automatically recorded, furthermore in certain cases, depending on the settings of the Data Subject's computer the data of the browser, operation system and the User's IP address, and the name of the website from the Data Subject arrived. The system automatically generates statistical data from these data.

Collecting and storing of the data of the visit, the IP address, furthermore the data of the browser and operation system are the characteristics of the functioning of the system, their process is technically essential, is made exclusively for statistical purposes, thus the Company does not conduct any further data process with these data.

### 3 COOKIES?

The cookie is small file, that stores the computer's browsing history. The content of these files can be checked, especially to make browsing more efficient. These cookies do not contain any data that would allow us to identify You. The anonymized data may contain the data of the user session, such as IP address, browser type, the time spent by the User on the Website and the buttons You were clicked on. You can read the detailed regulation here: [https://briefly.work/pdf/cookie\\_policy.pdf](https://briefly.work/pdf/cookie_policy.pdf)

### 4 HOW DOES BRIEFLY USE YOUR INFORMATION?

We use Your personal data – based on diverse purposes as well as on the legal basis of the processing – as follows:

4.1. We process Your following personal data for the **purpose and on the legal basis of the performance of the contract, providing the services by the Company** (Article 6 (1) b) of the GDPR):

- First and last name,
- e-mail address,
- phone number,
- mother's name,
- place and date of birth,
- address,
- portrait picture,
- each personal data contained in the portfolio,
- written introduction,
- Barion Wallet data,
- the types of the projects undertaken.

4.2. We process the following personal data **based on Your consent** (as the legal basis of this processing, Article 6 (1) a) of the GDPR) for marketing purposes (sending newsletter, sending coupons) furthermore to send e-mails:

- First and last name,
- e-mail address.

You shall always have the right to withdraw your consent given to the data processing for marketing purposes at any time. The withdrawal of the consent does not affect the lawfulness of processing based on your consent given before your withdrawal.

4.3. We process the following personal data **based on Your consent** (as the legal basis of this processing, Article 6 (1) a) of the GDPR) for the purpose to display on the Website, for marketing purposes, to present and advertise the Project Managers, Freelancers and the Service:

- First and last name,
- Project Manager, or Freelancer status,
- portrait picture
- brief written introduction,
- period of experience,
- main expertise (specialty).

You shall always have the right to withdraw your consent given to the data processing for the purpose to display on the Website at any time. The withdrawal of the consent does not affect the lawfulness of processing based on your consent given before your withdrawal.

- 4.4. We process personal data specified under section 4.1 of the present Policy for the purpose and on the legal basis of **compliance with legal provisions and to comply with the relevant legal obligations** (which is the legal basis of the data processing as well, Article 6 (1) c) of the GDPR) in order the Company to be able to fulfill certain legal provisions (e.g. provisions of accounting act), furthermore to prevent fraudulent transactions, monitor against theft and otherwise protect our customers and the Company, furthermore to assist the law enforcement and respond subpoenas and official requests.
- 4.5. We process the following personal data **for the purpose and on the legal basis of the legitimate interests of the Data Controller** (which is the legal basis of the data processing as well, Article 6 (1) f) of the GDPR) in order to improve the efficiency of our services, the Website and marketing efforts and to conduct surveys, furthermore, to perform other business activity if needed or other activities as needed as described in the present Policy.

Personal data collected when visiting our Website and using our services:

- Usage information,
- Actions performed on the Website,
- Date and regularity of visiting the Website,
- Content visited.

For collecting the above-mentioned data and making statistics and analysis we may use the following software and programs:

<b>Name</b>	<b>Registered seat</b>	<b>Country</b>
Google Analytics	1600 Amphitheatre Parkway Mountain View, CA 94043	United States
Facebook pixel, (Facebook Inc.)	1601 Willow Road Menlo Park, CA 94025	United States

The Company uses the above listed personal data and the derived aggregated data for statistical purposes as well.

- 4.6. **Data integrity and purpose limitation:** The Data Controller collects and stores personal data which are relevant for the purposes for which the data is collected, and does not use it in a way that is incompatible with such purposes unless such use has been authorized by You. We take reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete and current. We may occasionally contact you to determine that your data is still accurate and current.

## 5 DURATION OF THE STORAGE OF PERSONAL DATA

We retain Your personal data for so long as it is needed to fulfill the purposes outlined in the present Policy or until you withdraw your consent, unless a longer retention period is required or permitted by law (such as tax, accounting, other legal requirements). When we have no longer or no legal basis to process Your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 6. SHARING OF THE PERSONAL DATA COLLECTED BY THE COMPANY

- 6.1 The Data Controller shall not ensure access for a third party to personal data provided by You without Your preliminary consent, except the cases, when data transfer is necessary to perform the contract, is necessary for the Company to enforce its legitimate interest or is prescribed by law.
- 6.2 The Company shares the personal data specified under section 2.1.1 of the Policy with the Project Manager in order the selection process to the Project specified under section 10 of the GTC can take place, with the purpose of concluding a contract on performing the project of the Client between the Freelancer, the Project Manager and the Client (hereinafter: “**Project Agreement**”). Until concluding the Project Agreement the Project Manager processes these data as a data processor as specified under Article 4 point 8 of the GDPR.
- 6.3 If the Project Agreement is concluded, then the parties to the Project Agreement (hereinafter: “**Parties**”) regardless of their number, become each other’s data controllers on their own. The data process and data policy of the Parties after concluding the Project Agreement is independent from the Briefly, the Company shall not be held liable for any personal data breach and unauthorized data processing arising out of the Project Agreement.
- 6.4 The Company may share certain personal information with third party vendors in the European Union, and in a third country who supply software applications, web hosting and other technologies, furthermore provide the Company with certain services (hereinafter: “**Data Processor**”). The Data Processor shall only have access to such personal data collected by the Company, which is necessary to perform its work or to comply with legal provisions. The Data Processor never uses this information for any other purposes, solely for the performance of the services provided to the Company. During the data processing the Data Processor shall comply with the provisions of the present Policy, the applicable legal provisions, furthermore the contracts between the Data Processor and the Company.

We use the data process service of the following companies:

Name	Registered seat	Country	Activity (data processing service)
Weiszbart Law firm	1052 Budapest, Kristóf tér 3. III. emelet	Hungary	Providing legal services.
Barion Payment Zrt.	1117 Budapest, Infopark sétány 1. I. épület, 5. emelet 5.	Hungary	Services related to the online payment system, maintaining anti-fraud monitoring system.
Facebook, Inc. (Facebook Pixel)	1601 Willow Road Menlo Park,	United States of America	Measurement of the efficiency of the Facebook advertisements.

	CA 94025		
Google, LLC (Google Drive, Google Analytics, Google Tag Manager, Google Adwords)	1600 Amphitheatre Parkway Mountain View, CA 94043	United States of America	Hosting services and statistical services.
DigitalOcean, LLC	101 Avenue of the Americas, 10th floor, New York, NY 10013	United States of America	Hosting services.
The Rocket Science Group, LLC (MailChimp platform)	675 Ponce de Leon Avenue NE Suite 5000 Atlanta, GA 30308	United States of America	Newsletter services.

6.5 Based on the adequacy decision by the Commission of the European Union regarding third countries outside the territory of the European Union, personal data shall only be transferred to data processors having a registered seat in the United States of America, if the given data processor has joined the Privacy Shield Framework. The Facebook Inc., Google LLC, DigitalOcean LLC and The Rocket Science Group LLC has joined the Privacy Shield Framework, therefore the necessary level of protection is provided for the transfer of the personal data.

6.6 Personal data collected from individuals located within the EU to a third-party having a registered seat outside the EU without appropriate safeguards shall only be transferred on the basis of Your consent or when it is necessary for the performance of the contract. Data Controller makes every effort to ensure that the personal data transferred is safe and secure and that the personal data is processed in a manner consistent with the GDPR.

## 7. Rights of the Data Subjects

The Company shall answer the request of the Data Subject on exercising its rights within one month after the receipt of the request. The day of receipt of the request does not count into the deadline.

### 7.1 Right of access

The Data Subject is entitled to request information from the Company via the [hello@briefly.work](mailto:hello@briefly.work) e-mail address on whether the process of his/her personal data is in progress and such data processing is in progress, the Data Subject is entitled to know, that

- a) the Company
  - which personal data;
  - on what legal basis;
  - for what data processing purpose;
  - how long



processing, furthermore

- b) the Company whom, when, based on what legal provision, which personal data provided access or to whom transferred his/her personal data;
- c) the source of Your personal data;
- d) whether the Company uses automated decision-making, furthermore its logic including the profiling as well.

The Company provides the Data Subject after his/her first request with the copy of the personal data subject to the data processing free of charge, subsequently the Company is entitled to charge a reasonable fee based on the administrative costs.

In order to guarantee the security of personal data and to protect the rights of the Data Subject the Company is obliged to ascertain the correspondence of the Data Subject and the person intended to exercise the right of access, therefore the information, inspection of the data, and issuing a copy of them is subject to the identification of the person concerned.

## 7.2 **Right to rectification**

You may ask the Company via the [hello@briefly.work](mailto:hello@briefly.work) e-mail address to rectify any of the personal data related to You. If the Data Subject cannot justify in a credible manner the accuracy of the rectified data, the Data Controller fulfills the request within one month and informs the Data Subject about it by using the given contacts.

## 7.3 **Right of erasure ('right to be forgotten')**

You are entitled to that upon Your request the Company to delete without undue delay the personal data related to You, and the Company is obliged to delete the personal data related to the Data Subject without undue delay. If the processing of the personal data is based on legal obligation (e.g. to comply with the provisions of the accounting act), or is based on the Company's and/or other Users legitimate interest (e.g. to enforce legal claims), so the Company is entitled to further process the personal data as specified in the legal provisions.

If the Data Controller receives a request on erasure the Company shall, as a first step, scrutinize that the request on erasure certainly arrived from the person entitled to submit such request. Therefore, the Data Controller may ask for the data to identify the contract between the Data Subject and the Data Controller (e.g. number of the contract), the identification number of the document issued by the Company to the Data Subject, the personal identification data about the Data Subject, however the Data Controller shall not ask for any additional data for identifying that does not kept in the records on the Data Subject.

## 7.4 **Right to restriction (blocking) of processing**

You may request the Data Controller to restrict the processing of Your personal data (by indicating the restricted manner of the data processing and by assuring the separated processing from other data) if,

- You contest the accuracy of Your personal data (in that case the Data Controller restricts the data processing until the accuracy of the personal data is inspected);
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims;
- the Data Subject has objected the data processing (in that case the restriction lasts until it is not verified whether the legal interests of the Data Controller override the legitimate interests of the Data Subject).

#### **7.5 Right to object the data processing**

You may be entitled – for the purpose of enforcing legitimate interest – in relation to Your personal data to object the processing of Your personal data, if you consider that the Data Controller does not process Your personal data in accordance with the purposes specified in the Policy. The Data Controller scrutinize the lawfulness of the Data Subject’s objection and if it ascertains the lawfulness of the objection ceases the data processing and blocks the processed personal data, furthermore, informs all person on the objection and the measures taken thereof whom the personal data concerned were transferred.

#### **7.6 Right to data portability**

Regarding the purposes of the data processing specified under section 4.1 and 4.2 of the present Policy – having regard to their legal basis – You are entitled to receive the personal data concerning and provided by You to the Data Controller in a structured, commonly used and machine-readable format, furthermore, You are entitled to transmit this data by the Company to an other data controller without hindrance from the Company.

### **8. PROTECTING THE PERSONAL DATA OF THE MINORS**

The Company does not collect – in accordance with the Company’s GTC – the personal data of minors. If You know or become aware of that a child under the age of 16 has registered on the Website, please inform the Company on the following e-mail address: [hello@briefly.work](mailto:hello@briefly.work)

### **9. COMPLAINT, RIGHT TO REMEDY**

If You consider that the Company during the processing of Your personal data infringed the effective data protection regulations, or the Company does not respond to your request, then:

- You are entitled to file a complaint to the NAIH (Hungarian National Authority for Data Protection and Freedom of Information; in Hungarian “*Nemzeti Adatvédelmi és Információszabadság Hatóság*”, address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, Hungary, mailing address: 1530 Budapest, Pf. 5.; e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)) or

- You have the opportunity to turn to the Court, which will act in priority. In that case You are free to decide whether you submit your lawsuit at Your home address (permanent residence) or habitual residence (temporary address). You can find the competent Metropolitan Court to Your home address or residence on the following website: <http://birosag.hu/ugyfelkapcsolatiportal/birosag-kereso>

#### **10. AMENDING THE POLICY**

The Data Controller is entitled to amend the present Policy and the information on the use of the Website from time to time, due to different updates, unilaterally without any prior notice. The amendments of the Policy shall be effective upon their publication. Having regard to this it is recommended to visit the Website regularly and to monitor the acceptability of the changes.

#### **11. FURTHER INFORMATION**

If you have any questions concerning this Policy or the services of the Company, please contact us via the [hello@briefly.work](mailto:hello@briefly.work) e-mail address.