

PRIVACY POLICY

We are very keen on being compliant with the European data protection rules and principles to protect you and your personal data. Please, revise this Privacy Policy before you disclose them.

1. Preamble

- 1.1. Flashlight Analytics Kft. as data controller ('**Flashlight**') is a company registered and operating in Hungary who created <https://flashlight-analytics.com> ('**Website**'), which provides B2B data services from gathering raw data to providing deep dive analysis and process optimisation within the automotive industry ('**Service**'). If you ('**User**') would like to contact us through our website, you may disclose certain personal data to us.
- 1.2. For the purposes of this Privacy Policy, the terms 'we' or 'our' etc. shall mean the Flashlight.
- 1.3. **This Privacy Policy requires the expressed consent hereto by you, which you can withdraw anytime.** Your consent shall be voluntarily, specific and based on the related information we provide to you.
- 1.4. Flashlight may amend this Privacy Policy unilaterally, at any time as the business processes develop. If you don't agree with the modifications, you can delete your account anytime. This Policy shall come into effect upon its publication. The prevailing versions of this Policy is available on the Website: https://flashlight-analytics.com/privacy_policy
- 1.5. Flashlight handles your personal data confidentiality and takes all the safety, technical and organizational measures that guarantees the security of your data.
- 1.6. Flashlight attempts to ensure the accuracy and up-to-date nature of the personal data; therefore, we take all necessary measures for the immediate erasure or rectification of the data that are inaccurate.
- 1.7. Your personal data is only yours, therefore you can request the restriction of data processing, rectification or erasure of your data, and you can object at any time, free of charge via e-mail: info@flashlight-analytics.com. We respond to you without undue delay, but latest within 30 days from the receipt of the request. If we have to reject to perform your request, we will provide a proper justification of rejection. In justified cases, depending on the complexity and number of requests, we can extend the deadline by two further months and we will inform you about that within one month of receipt of the request, together with the reasons for the delay.

2. Service provider's data

Name of Flashlight	Flashlight Analytics Kft.
Registered seat of Flashlight	H-1039 Budapest, Petőfi utca 3. fszt. 2.,
The address of the customer service	H-1039 Budapest, Petőfi utca 3. fszt. 2.,
The contact details of Flashlight, its electronic mailing address used for regular communication with customers	info@flashlight-analytics.com
Company org. number	01-09-372785
The company's tax number	28759786-2-41
The name of the registering authority	Budapest-Capital Regional Court as Court of Registration
Website	https://flashlight-analytics.com

3. Applicable laws

Flashlight hereby declares to process your personal data in compliance with the prevailing laws and regulations, with special regard to the following:

- The related EU regulation: the General Data Protection Regulation of the European Union (Regulation 2016/679 (EU), the 'GDPR')
- Hungarian law: Act CXII of 2011 on information self-determination and freedom of information.

4. Legal Ground for Data Processing

4.1. The legal ground for personal data processing is:

- a) your voluntary consent (Article 6 (1)(a) of the GDPR);
- b) contract concluded by and between Flashlight and the User for contractual performance (Article 6(1)(b) of the GDPR);
- c) for the performance of the Flashlight's legal obligations, like auditing and accounting liabilities (Article 6(1)(c) of GDPR);
- d) for the enforcement of the legitimate interest of the Flashlight or a third party (Article 6(1)(f) of GDPR).

4.2. You can grant and withdraw your consent to the use of your personal data for advertisement purposes.

5. The Data Processed by Flashlight

5.1. In order for you to be able to use the Services via contact with Flashlight, you shall disclose certain personal **data** to Flashlight through **our** Website. If you reject to comply with such request; Flashlight is entitled to lawfully reject the provision of Services, so you may be unable to use them.

5.2. Within the scope of data processing, we can in particular pursue the following activities: collect, record, register, systematize, store and use the personal data for the purposes of data processing, to query, block, erase and destruct your data and to prevent the further use thereof. In lack of a related legal obligation, we never publish, coordinate or connect your personal data with each other.

5.3. Mandatory data provision by Users

5.3.1. Flashlight may process the following data provided by the Users. The disclosure of these data is necessary for the provision of the contact opportunity at the Website:

You	Legal grounds	Data category	Purpose of Data Processing
User wants to contact with Flashlight via Website	4.1. a)	Name (First name and last name)	1. Identification of the user and ensuring the communication; 2. Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud; 3. Advertisement, marketing activities
		Email address	1. Identification of the user and ensuring the communication; 2. Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud; 3. Advertisement, marketing activities.

		Free text of the message	<ol style="list-style-type: none"> 1. Identification of the user and ensuring the communication; 2. Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud.
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5.4. Cookies applied by Flashlight

5.4.1. **What is a cookie?** Cookies are small data files of information that our Website transfers to your hard drive or mobile device to store and sometimes track information about you. Although cookies do identify a User's device, cookies do not personally identify Users. Additionally, mobile devices may use other tracking files which are similar to cookies.

5.4.2. **Why we use cookies:** Our website use cookies to distinguish you from other Users. This helps us to improve our website and to provide you with a good experience when you browse our Website.

5.4.3. **Types of cookies we may use:**

Strictly necessary cookies: these are cookies that are required for the operation of a website, such as to enable you to log into secure areas.

Performance cookies: these types of cookies recognise and count the number of visitors to a website and to see how users move around in each. This information is used to improve the way the website work.

Functionality cookies: these cookies recognise when you return to a website, enable personalised content and recognise and remember your preferences.

Targeting cookies: these cookies record your visit to a website, including the individual pages visited and the links followed.

Generally, the strictly necessary cookies and some performance and functionality cookies only last for the duration of your visit to a website: these are known as 'session cookies'. The functionality cookies and some targeting and performance cookies will last for a longer period of time: these are known as 'persistent cookies'.

Third party cookies: Some of the persistent and session cookies used by our website may be set by us, and some are set by third parties who are delivering services on our behalf. For example, we use Google Analytics to track what users do on the website so we can improve the design and functionality.

5.4.4. **Blocking cookies:** Most websites and mobile devices automatically accept cookies but, if you prefer, you can change your browser, device settings to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting www.allaboutcookies.org which includes additional useful information on cookies and how to block cookies using different types of browser or device. To block the IDFA on your iOS mobile device, you should follow this path: Settings > General > About > Advertising and then turn on 'Limit Ad Tracking'. To block Android ID on your Android device, you should follow this path: Google Settings > Ads and then turn on 'Opt out of interest-based ads'.

6. The method and term of the use of the data collected

6.1. We only process your personal data if it is essential, suitable for and limited to the extent and duration required to the achievement of the purposes set for processing.

Purpose of Data Processing	Justification of purpose	Duration of data processing
1. Identification of the user and ensuring the communication	Flashlight may use the User's personal data to ensure effective communication with the User, in the course of which Flashlight contacts and identifies users through their contact data provided.	Flashlight shall process the personal data until the purpose of processing has ceased, or erases them in case further processing of such data is no longer necessary for the purpose of processing. User may request for the erasure of his/her data in a letter sent to the info@flashlight-analytics.com e-mail address. For the purposes of evidencing in the case of a dispute, the data of the concerned User shall be processed during the term of the general limitation period and for five (5) years after the final and binding closure of the dispute.
2. Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud	Flashlight may use the personal data of the User to secure the legitimate interests of Users in the course of the use of our contact box. In the scope of the above, Flashlight shall be entitled to the following activities: the prevention and termination of fraud, spam, misuses and other harmful activities, to perform security investigations and risk analysis, to check and verify the data provided by the user.	
3. Advertisement, marketing activities	Flashlight may use the personal data of Users solely for the following advertisement and marketing activities: to send promotion messages, advertisements, newsletters, other information popularizing the Services via e-mail, to display surveys, promotion activities and events of Flashlight and its cooperating partners.	The User may unsubscribe from advertisement-related communication at any time, through the info@flashlight-analytics.com e-mail address and, in case of newsletters, by clicking directly on the unsubscribe menu function in the newsletter. In the absence of such an act, Flashlight shall process data for up to a maximum of 5 years.

7. The persons having access to the data processed, data transfers

7.1. To be able to provide you with undisturbed services, for quality assurance purposes, as well as to enable the investigation of customer messages, claims and complaints, we might have to transfer your data to third parties. By accepting this Privacy Policy you give your expressed consent to these data transfers.

7.2. Data transfer may take place in the following cases:

Recipient of data transfer	Scope of data that may be transferred
Transfer of data to employees	To the personal data processed by us, Flashlight shall have access; the personal data shall also be made available to the employees of Flashlight, but only if their access to and processing of personal data is required for the purposes of data processing related to the given data category.

7.3. To be able to provide you with undisturbed Services, we use the contribution of the following third-party service providers:

Hosting service provider, or a company providing system operation services to the Flashlight upon contractual relationship (Data Processor)	Name: Tárhely.Eu Szolgáltató Kft. Address: 1144 Budapest, Ormánság utca 4. X. em.241. Company reg. no.: 01-09-909968 Contact details: ugyfelszolgalat@tarhely.eu The website of the hosting service provider: https://tarhely.eu/
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7.4. The Data Processor assists Flashlight in the smooth operation of the IT infrastructure that facilitates the storage of personal data provided to Flashlight, Data Processor has no direct access to personal data. We expressly declare that we have no direct or indirect liability with respect to the data processing activity of the Data Processor and the security of personal data in the course thereof; in this regard, the privacy policies and regulations of the Data Processor shall apply.

7.5. If we need to involve further Data Processors, we will notify you about that by the modification of our Privacy Policy.

8. Rights and obligations of the Parties

8.1. Processing of Users' data, rights of information, access to data

You can access your personal data which have been collected by us. Please, notify us of any change in your data, at info@flashlight-analytics.com. You are responsible for ensuring the up-to-date status and reality of the personal data. In order to protect you, in case of any requests coming concerning your data, we need to verify the person. We do not retain personal data for the sole purpose of being able to react to potential requests.

8.2. Rectification and erasure: You can ask us to rectify your personal data if necessary or to delete them where the retention of such data infringes the provisions of the related laws and regulations or if they are no longer necessary in relation to the purposes for which they are originally processed.

8.3. Withdrawal of consent and restriction of processing: In case you withdraw your consent to our processing of your personal data, we might not delete your data if processing is necessary for the protection of exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest etc. The processing of personal data is essential until the proper, contractual completion of the contract concluded by and between Flashlight and you.

8.4. Right to object: You still have the right to object against the processing of your personal data considering your individual circumstances even if it is lawfully processed for the performance of a task carried out in the public interest or in the exercise of official authority vested in Flashlight, or on grounds of the legitimate interests of controller or a third party.

8.5. Right to data portability: If you need it, we can provide you with a structured, commonly used and machine-readable format or all of your personal data processed by us and you can transmit those data to another controller.

8.6. The Obligation of the User: You are the only one who is responsible for the lawfulness, reality and accuracy (i.e. the quality) of your data under criminal liability.

9. Further Important Information

9.1. Records of data processing activities. Service Provider complies with the obligation of keeping records of the data processing activities and complies with and maintains a data processing record that is relevant to the employment activity. We don't have to record our User's personal data.

9.2. Data Protection Officer: In our standpoint, Flashlight is not obliged to appoint a data protection officer, as our main activities do not involve data processing operations that would allow a regular, systematic and high-scale follow-up monitoring of our users; furthermore, nor do we handle any special categories of personal data or criminal-relevant data.

9.3. Supervisory organs and other authorities: The territorial delineation of this Privacy Policy may extend to other foreign authorities if the User is concerned with a location or place of business outside Hungary. Our supervisory authority who you can turn to regarding our data processing is:

Data Protection Authority, with regards to the owner of Flashlight	Name: Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c Post address: 1530 Budapest, Pf.: 5. Phone: +36 (1) 391-1400 Email: ugyfelszolgalat@naih.hu
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Foreign data protection authorities may also be involved if you have your location or place of business outside Hungary. You can search here the relevant authority: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

9.4. Automated decision making, profiling

We do not apply decision-making procedures that are based solely on automated processing, including profiling, which would have legal effects on you. Should we introduce such procedures in the future, you will be properly notified about that and we will ask for your consent thereto.

9.5. Processing of sensitive data

We do not process personal data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms, or require specific protection as the context of their processing could create significant risks to the fundamental rights and freedoms. If we decide to process such sensitive data, this activity shall be pursued with special care and diligence, having your expressed consent thereto, and only the extent it is required.

We do not process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation or criminal data.

9.6. Processing children's data

We do not collect personal information from children.

10. Personal data breach

10.1. In case of personal data breach, where the incident is likely to pose a high risk to the rights and freedoms of those concerned, we submit the report towards the data protection supervisory authority required by the laws and regulations, without undue delay, but in any case, within 72 hours from getting aware of the incident. We have developed internal procedures in case of personal data breach, and personal data breaches are also recorded into a registry. If you are affected by such personal data breach will also be notified, if the prevailing laws and regulations require so.

- 10.2. If you detect a threat of personal data breach, we ask to report it immediately via email at info@flashlight-analytics.com. Furthermore, in case of personal data breach, you may initiate a case before NAIH against Flashlight.

11. Changes of the Privacy Policy

- 11.1. Flashlight reserves the right to amend this Privacy Policy at any time. Amendments will be published immediately on the website <https://flashlight-analytics.com>.
- 11.2. In case of amendment, the User will be notified thereof thirty (30) days prior to the date of effectiveness of amendment, via email.
- 11.3. In case you object to such amendment, you may notify Flashlight thereof and disclose your respective comments and notices via e-mail (info@flashlight-analytics.com); furthermore, you may request the erasure of your personal data.