

Data Privacy Policy

Data controllers:

Flow Consulting Ltd.

Headquarters: 1146 Budapest, Zichy Géza u. 5.

Tax number: 11929750-2-42

Company registration number: 01-09-861492

Larskol Services and Trading Ltd.

Headquarters: 1164 Budapest, Etelköz u. 19.

Tax number: 14330214-2-42

Company registration number: 01-09-899088

Data Protection Officers:

Flow Consulting Ltd. - Ildikó Koncz

Phone: +36 1 422 1714

E-mail: koncz.ildiko@flow.hu

Larskol Services and Trading Ltd. – Tamás Kolbe

Phone: +36 20 329 2651

E-mail: tamas.kolbe@larskol.hu

Scope of data managed:

Data of subscribers requesting access to the Flow | Larskol PAY software (Salary Benchmark software) to enable the use of the system (company name, name, email address, job / position, telephone number, type of access) and data related to secure system use and traceability itself (for uploader and key users) tracking which subscriber user uploaded which data and when).

The purpose of data management:

Communication required for system use, secure system use, and traceability.

The Data Controller shall take appropriate IT, technical and personal measures to ensure that the personal data it processes are protected against, inter alia, unauthorized access or alteration, and ensure that data stored in the IT system is logged, ie it is always possible to check when, what personal information was accessed. The recorded data may be accessed by the employees of the Data Controller and the Data Processor in order to ensure the above purposes.

Duration of data management:

After confirmation of registration, the total duration of the subscription period and system use.

After deleting a user and losing access, the data required for communication (name, e-mail address, job / position, telephone number, type of access) will be deleted immediately.

Exceptions to this are data related to secure system use and traceability (for uploading and key users, tracking which user uploaded which data). For such data, the user will remain visible after deletion until expiration of the data uploaded by them (ie until another user overwrites the data), but for a maximum of 5 years.

Legal basis for data management:

Voluntary consent of the data subject.

Data processor:

Netkorzo Online Kft.

2081 Piliscsaba, the road of King Béla 87.

Tax number: 22774963-2-13

Company registration number: 13-09-139270

Task performed: Operation and maintenance of the complete data set and system of the Flow | Larskol PAY software.

Users' rights regarding the management of their data:

Users can view and modify their own personal data after logging in to the Flow | Larskol PAY interface, and can also delete their own data there, which terminates their access to the software.

A key user will only be able to delete his or her data if he or she has transferred the key user role to another colleague, as all corporate subscriptions can only remain in effect if a company has at least one designated key user.

Handling of cookies

What are cookies?

When you visit our website, a small file called A "cookie" (cookie, hereinafter: cookie or cookie) is placed on your IT device (eg computer, laptop, tablet, mobile phone, hereinafter: device), which may serve several purposes. Some cookies used by the Data Controller are essential for the proper functioning of the website, others collect information about the use of the website to make the website even more convenient and useful. Some cookies are only temporary and disappear when you close your browser, but there are some that remain on your device for a longer period of time.

The purposes of the cookies we use:

System cookies are designed for the system to function properly:

- Security features.
- Handle registered users.

The purpose of statistical cookies is to perform web analytics and analysis.

System cookies in more detail

These cookies are necessary for browsing the website of the Data Controller and for using the functions of the website, as this allows the visitor to remember the actions performed in the functions or services of the site. Without the use of these cookies, the smooth use of the website cannot be guaranteed.

<u>Cookie name</u>	<u>The purpose of the cookie</u>	<u>Duration</u>
_csrf-frontend	security	during a session
advanced-frontend	system	during a session
Google Recaptcha	.google.com	during a session, 2 years
cookieconsent_statistics	system	1 year
cookieconsent_system	system	1 year

Google Privacy Policy: https://policies.google.com/privacy?hl=en_US

Statistical cookies in more detail

With these cookies, the Data Controller collects information about how our visitors use the website (eg which subpage you visited, which page you clicked on, how long each visit lasted, what were any error messages, etc.). We do this so that we can further develop our website according to the needs of our users and provide a high-quality, user-friendly experience. In order to measure performance, our website also uses third-party cookies when we visit each website, which we use to track how many people visit the website and what content they visit. All information is stored anonymously and used to analyze visitor behavior.

The website uses cookies from the following providers:

Google Analytics:

It collects information about how visitors use the website. These cookies are provided by Google Ireland Limited.

Detailed information: <https://www.google.com/analytics/terms/us.html>.

<u>Cookie name</u>	<u>Duration</u>
_ga	2 years
_gid	24 hours
_gat	1 minute
__utma	2 years
__utmt	10 minutes
__utmb	30 minutes
__utmc	during a session
__utmz	6 months
__utmv	2 years

The cookies we use cannot identify the user per se.

Data collected by cookies

Our cookies record and manage the following information about users' devices and the browser they use:

- the IP address used,
- type of browser used,
- operating system characteristics of the device used for browsing,
- the exact date of the visit,
- the function or service used on the website,
- time spent on the website,
- the address of the previously visited website.

Enabling or disabling cookies

Different browsers allow you to change your cookie settings. Most browsers accept cookies by default, but you can change these settings so that your browser can prevent them from accepting automatically and offer you the option to re-enable cookies each time.

Please note that as cookies are intended to support and facilitate the usability and processes of the website, disabling cookies does not guarantee that you will be able to use all the features of the website, in which case the website may not function as intended.

Remedies

In connection with complaints related to data management you may contact the National Data Protection and Freedom of Information Authority (address: 1055 Budapest, Falk Miksa utca 9-11 .; correspondence address: 1363 Budapest, Pf .: 9 .; e-mail: ugyfelszolgalat@naih.hu; phone: +36 (1) 391 1400) and the court of the place of residence or stay.