

PRIVACY NOTICE

This privacy notice provides information about how Artillence Korlátolt Felelősségű Társaság (registered office: 1124 Budapest, Németvölgyi út 87/A 3rd floor, door 16a; company registration number: Cg.01-09-376748; tax number: 28848329-2-43; statistical number: 28848329-6201-113-01; represented by: Gergely Jakab Karz, managing director with sole representation and signing rights), as the cooperating data controller (hereinafter: "Cooperating Data Controller"), and the responsible data controller contracted with the Cooperating Data Controller handle users' personal data when using the Stampedly digital stamp card service.

1. Responsibility for Data Protection

The Cooperating Data Controller and the responsible data controller in contractual relationship with it are responsible for data protection in connection with the use of the Stampedly digital stamp card service.

In this context, the Cooperating Data Controller and the responsible data controller, as joint data controllers, have agreed in a separate agreement on which controller is responsible for fulfilling which data protection obligations. The Cooperating Data Controller and the responsible data controller will provide the essence of this joint data processing agreement upon your request.

2. Registration, Communication, Service Development, Abuse Prevention, Legal Basis for Data Processing, and Scope of Personal Data Processed

To use the Stampedly digital stamp card service, only your email address is required. Providing your email is necessary to (i) enable access to the digital stamp card prepared by the responsible data controller (on the www.stamped.ly website or in your Apple or Google Wallet), and (ii) keep track of the number of stamps collected by you for a given digital stamp card. When you make a purchase using the Stampedly service, we utilize Stripe Checkout, a service provided by Stripe Payments Europe, Ltd. ("Stripe"), to process your payment. In this context, Stripe will collect and process your payment information, which may include your credit card details, billing address, and other information necessary to complete the transaction. This data is processed by Stripe in accordance with their own privacy policy, which we encourage you to review at [\[Insert Link to Stripe's Privacy Policy\]](#). We only receive confirmation from Stripe that your payment has been successfully processed; we do not have access to your full payment

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details. The processing of your payment data by Stripe is necessary for the performance of the contract between you and the responsible data controller (Article 6(1)(b) GDPR).

For the purpose of issuing invoices for your purchases, we transmit necessary transaction data to Számlázz.hu, a service provided by KBOSS.hu Kft. ("Számlázz.hu"). This data may include your name (as provided), billing address, the details of your purchase (items, quantities, prices), and the date of the transaction. Számlázz.hu processes this data to generate and store invoices in compliance with Hungarian accounting and tax regulations. The processing of this data and its transfer to Számlázz.hu is necessary for compliance with a legal obligation to which the Cooperating Data Controller is subject (Article 6(1)(c) GDPR).

Your email address will only be shared with third parties outside the Stampedly digital stamp card service if and to the extent you have given prior consent. In the case of a suspected abuse during the use of the Stampedly service, personal data may be disclosed to the other relevant partner, investigative authorities, or other authorities to clarify the circumstances, while protecting your interests to the greatest extent possible.

If you contact the responsible data controller or the Cooperating Data Controller in any way, your relevant personal data will be processed to fulfill your request.

In order to tailor the Stampedly stamp card service and other services of the Cooperating and responsible data controllers to user needs, they evaluate your data in the form of anonymous statistics.

The responsible data controller analyzes your data to detect misuse, e.g., breach of general terms or suspected fraud. In case of suspected abuse, the responsible controller notifies the Cooperating Data Controller and, if necessary, the investigative authority.

The legal basis for the data processing outlined in this section is Article 6(1)(b) of the General Data Protection Regulation (EU Regulation 2016/679 - "GDPR") (performance of a contract or steps prior to entering into a contract) and Article 6(1)(f) (legitimate interest, i.e., the interest of the controllers in the successful and secure operation of the Stampedly digital stamp card service).

3. Marketing Activities and Market Research

By accepting this privacy notice, you consent to your data being used for marketing and market research purposes. Use for marketing purposes means that you will receive emails only related to the Stampedly digital stamp card service, including notifications about promotions, discounts, and related products and services.

Additionally, with your consent, the Cooperating and responsible data controllers are authorized to use and process your data for market research to assess your satisfaction via email with the responsible controller, its offers, services, and the Stampedly digital stamp card service.

During marketing and market research, your email address and data related to your use of the Stampedly service (number of purchases, place and time of purchases, number of existing and missing stamps) are processed and used.

If you consented to the above, you may withdraw your consent at any time with a written declaration to either controller. Partial withdrawal is not possible. Upon withdrawal, the related services will no longer be provided, and agreements based on your consent will be considered terminated. The controllers will inform each other of your withdrawal. The withdrawal does not affect the lawfulness of data processing based on consent before its withdrawal. If you withdraw your consent, your data will not be processed as outlined above. You may still use the Stampedly digital stamp card service, but will only receive information strictly necessary for service use (including but not limited to stamp notifications).

The legal basis for the data processing in this chapter is Article 6(1)(a) of the GDPR (consent of the data subject).

4. Data Retention

We retain your personal data as long as you use the Stampedly service. After that, your data will be deleted, unless legal or accounting obligations require retention, in which case the data will be deleted after 10 years.

If your personal data is no longer needed for the purposes defined in sections 2 or 3 above—or for the establishment, exercise, or defense of legal claims—it will only be stored for the legally required accounting or tax duration and will not be processed for other purposes.

5. Your Rights Regarding Data Processing

During the data processing period, you are entitled to the following rights under the GDPR:

- The right to withdraw consent;
- Access to personal data and information related to data processing;
- The right to rectification;
- The right to restrict processing;
- The right to erasure;
- The right to object;
- The right to data portability.

If you wish to exercise your rights, this will involve identifying yourself, and the data controllers must necessarily communicate with you. Therefore, you will need to provide personal data for identification purposes (identification can only be based on data that the data controllers already process about you), and your complaints regarding data processing will be accessible in the data controllers' email accounts within the timeframe specified in this notice.

Right to Withdraw Consent

You are entitled to withdraw your consent to data processing at any time. In such a case, the provided data will be deleted from our systems.

Right of Access to Personal Data

You have the right to receive confirmation from the data controllers as to whether or not your personal data is being processed, and, if so, you have the right to:

- Access the personal data being processed; and
- Be informed by the data controllers of the following:
 - The purposes of processing;
 - The categories of personal data processed;
 - Information about recipients or categories of recipients with whom the data has been or will be shared;
 - The planned duration of data storage, or, if not possible, the criteria used to determine that duration;

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- Your right to request rectification, erasure, or restriction of processing, and, in the case of legitimate interest, your right to object to such processing;
- Your right to file a complaint with a supervisory authority;
- If the data was not collected from you, any available information about its source;
- The existence of automated decision-making (if applicable), including profiling, and, at least in those cases, meaningful information about the logic involved and the expected consequences for you.

This right may be exercised for the purpose of establishing and verifying the lawfulness of data processing. In the case of repeated requests, the data controllers may charge a reasonable fee for fulfilling your request.

The data controllers will provide access to your personal data by sending the processed data and relevant information via email after verifying your identity.

Please specify in your request whether you are seeking access to personal data or information related to data processing.

Right to Rectification

You are entitled to have inaccurate personal data about you corrected without undue delay upon request.

Right to Restrict Processing

You have the right to request restriction of processing if one of the following applies:

- You contest the accuracy of the personal data; in this case, restriction applies during the period that allows the data controllers to verify the accuracy of the data. If the data is confirmed immediately, no restriction applies;
- The processing is unlawful, but you oppose deletion and instead request restriction of use (e.g., you need the data to assert legal claims);
- The data controllers no longer need the personal data for the stated purpose, but you require them to assert, exercise, or defend legal claims; or
- You objected to processing, but the data controllers may have legitimate grounds; in this case, processing must be restricted until it is determined whether the data controllers' legitimate grounds override yours.

While processing is restricted, such personal data may only be processed (apart from storage) with your consent, for the establishment, exercise, or defense of legal claims, for

the protection of the rights of another natural or legal person, or for important public interest reasons of the EU or a Member State.

The data controllers will inform you in advance (at least 3 business days prior) before lifting the restriction.

Right to Erasure (Right to be Forgotten)

You have the right to have your personal data erased without undue delay if one of the following grounds applies:

- The data is no longer needed for the purposes for which it was collected or otherwise processed;
- You withdraw your consent, and there is no other legal basis for processing;
- You object to processing based on legitimate interest, and there are no overriding legitimate grounds;
- The personal data has been unlawfully processed, which has been confirmed upon complaint;
- The data must be deleted to comply with legal obligations under EU or Member State law applicable to the data controllers.

If the data controllers have made your data public and are obliged to delete it for any of the above reasons, they must, considering available technology and implementation costs, take reasonable steps—including technical measures—to inform other data controllers processing the data that you have requested deletion of any links to, copies, or replications of that data.

Deletion is not required if processing is necessary:

- For exercising the right to freedom of expression and information;
- To comply with legal obligations that require processing by EU or Member State law, or for performing a task in the public interest or in the exercise of official authority;
- For the establishment, exercise, or defense of legal claims (e.g., if you owe the data controllers a payment or have ongoing complaints).

Right to Object

You have the right to object, at any time, on grounds relating to your particular situation, to the processing of your personal data based on legitimate interests. In such cases, the data controllers may no longer process the personal data unless they can demonstrate compelling

legitimate grounds that override your interests, rights, and freedoms, or that are related to legal claims.

If your data is processed for direct marketing purposes, you have the right to object at any time to the use of your data for such purposes, including profiling. Once you object to processing for direct marketing, your personal data may no longer be processed for such purposes.

Right to Data Portability

If processing is carried out by automated means or based on your voluntary consent, you have the right to request and receive the personal data you have provided to the data controllers.

Automated Decision-Making

You have the right not to be subject to a decision based solely on automated data processing (including profiling) that would have legal effects concerning you or similarly significantly affect you. In such cases, data controllers are required to take appropriate measures to safeguard your rights, freedoms, and legitimate interests, including at least the right to request human intervention from the data controller, to express your viewpoint, and to contest the decision.

The provisions of this chapter shall not apply if the decision:

- Is necessary for entering into or performing a contract between you and the data controller;
- Is authorized by Union or Member State law applicable to the data controller, which also lays down suitable measures to safeguard your rights, freedoms, and legitimate interests; or
- Is based on your explicit consent.

6. Legal Remedies

If you believe that the data controller has violated any data protection laws or has failed to fulfill any of your requests, you may initiate an investigation procedure with the **National Authority for Data Protection and Freedom of Information** (NAIH) to terminate the presumed unlawful data processing (mailing address: 1363 Budapest, P.O. Box 9; email: ugyfelszolgalat@naih.hu; phone numbers: +36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391-1400).

You are also hereby informed that in case of a violation of data protection laws or if the data controller fails to fulfill any of your requests, you may file a civil lawsuit against the data controller in court.

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IF THE CONTENT OF A PRIVACY NOTICE FROM ANOTHER SOURCE DIFFERS FROM THIS PRIVACY NOTICE, THE TERMS OF THIS PRIVACY NOTICE SHALL PREVAIL.

Budapest, August 17, 2023