

## DATA PRIVACY POLICY

The objective of this Policy is to lay down the principles and policy of data protection- and handling used by HandInScan Zrt. (hereinafter: Company), which are accepted by the Company as binding. When drafting this Policy, Company paid special attention to the Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Information Act), the Act CXIX of 1995 on the Use of Name and Address Information Serving the Purposes of Research and Direct Marketing, the Act VI of 1998 enacting the Strasbourg Convention for the Protection of Individuals with Regards to Automatic Processing of Personal Data, dated on 28 January 1981, and the provisions of the Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities, and the recommendations of the "ONLINE PRIVACY ALLIANCE" .

Company's Data Protection Registration Identification:

### 1. Recital

The terms and expressions used during the application of this Privacy Policy are understood to have the following content, which is identical to the content of the same expressions for the purposes of the aforementioned effective regulations.

**Personal data:** any data or conclusion made thereof relating to a given (identified or identifiable) natural person (the Affected) Personal data will remain as such, as long as its connection with the Affected can be re-established. A person can be regarded as identifiable especially if he/she, directly or indirectly can be identified through name, identification number and/or one or more physical, physiological, mental, economic, cultural or social factor characterising his/her identity.

**Consent:** the voluntary and definite expression of the intent of the Affected, based on proper information. The Affected gives his/her clear consent with it to the full or partial handling of personal data pertinent to his/her person.

**Objection:** the statement of the Affected, wherein he/she objects to the handling of his/her personal data and requests the cessation of the data handling and the deletion of the data already handled.

**Data Controller:** a natural- or legal person or organization without a legal personality establishing the purpose of data handling, making decisions regarding data handling

(including the tool to be used) and carrying those out or delegating the execution thereof to an assigned Data Processor.

Controlling of data: any kind of operation or set of operations carried out with regards to the data, regardless of the applied procedure, including the collection, recording, capture, arrangement, storage, change, utilization, retrieval, transmission, dissemination, alignment or connection, blocking, deletion or destruction or hindering the further utilization thereof.

The capture of photo- sound- or video recordings or physical characteristics suitable for personal identification (e.g. fingerprints, palm prints, DNA samples, iris image) is also considered as data handling;

Transmission of data: disclosure of data to a given third person;

Dissemination: disclosure of data to any person;

Deletion of data: obstructing data to the extent that their restoration is no longer possible;

Blocking of data: making the transmission, recognition, dissemination, alteration, change, destruction, deletion, connection or alignment or use of data impossible either irreversibly or for a definite period;

Destruction of data: the total physical destruction of data or the data storage device containing the data

Processing of data: carrying out the technical functions associated with the data controlling operations, regardless of the method and tool used for the execution of the operations and the place of the application;

Data processor: a natural or legal person, or an organization without a legal personality handling personal data while performing an assignment obtained from the data handler;

User: The intended user of Semmelweis Scanner (hereinafter: Scanner), a tool used for the monitoring of public hygiene

The Affected: any given identified or - directly or indirectly - identifiable natural person;

Company: HandInScan Zrt., the service provider of Semmelweis Scanner (Registered address: 4025 Debrecen, Arany János u. 55., Site address: 1118 Budapest, Ménesi út 39/fszt/1-2)

Third person: natural or legal person or any organisation without a legal personality other than the Affected, the data handler or the data processor;

Third country: any country that is not a member state of the European Economic Area.

Measurement image: A photo taken of one or both sides of the hand of the Affected.

Result image: A schematic figure depicting the hand of the affected person, containing the scanner measurement results.

## **2. Set of Controlled Personal Data**

Based on the decision made by the User, Company controls the following data on the Company's central data storage server during data controlling:

- Name of the Affected
- Number of RFID card personally used by the Affected
- Age, sex, e-mail address, occupation, years spent in service, years spent in health care,
- User organisation/department
- Result image, result (percentage), result (serial numbers indicating the region)
- Date of measurement
- Scanner serial number

If User stores the afore described data on his/her own data storage server, Company does not control any kind of personal data with regards to that User. Based on the information of the National Authority for Data Protection and Freedom of Information, the result image taken by the Semmelweis Scanner is not considered as personal data.

### **3. Data Controlling Principles Used by the Company**

3.1. Personal data may be handled if

- a) consent of the Affected is granted
- b) it is ordered by law or - based on a statutory authorization - a local municipality by law.

3.2. Company only handles personal data for the purposes hereunder, in order to exercise rights and perform obligations. Data handling shall comply with this purpose throughout the entire process thereof.

3.3. Only personal data essential and suitable for the realisation of the objectives may be controlled, and only to the extent and duration necessary for the realisation of the objectives. Personal data may only be controlled if the consent based on proper information is granted.

3.4. Company informs the User about the fact of controlling the data of the Affected, especially about the purpose and legal basis of the data controlling, the person authorised to control and process the data, the time period of data controlling and about the persons the data are disclosed to. The information has to cover the rights of the Affected in connection with the data controlling and the possibilities for legal redress. Information of the Affected is the responsibility of the User.

3.5. The handled personal data are to comply with the following requirements:

- a) they are captured and handled in a fair and legal manner;
- b) they are accurate, complete and if necessary, up-to-date;
- c) their storage method is suitable for identification of the Affected only for the limited time period necessary for the purpose of the storage.

Company does not apply any kind of general and uniform personal identification number (or character string) with unlimited use.

### **4. Company's Procedures for Data Collection and -Controlling**

4.1. During the operation of the Company's Scanner, handling of all data in connection with the Affected is based on a voluntary consent, which is indicated by his/her voluntary use of the scanner, following the User's information given to him/her.

4.2 Data collection is carried out by the Scanner and the assessment software belonging to the Scanner. Images (measurement image) are stored in the Scanner until their deletion. Following the processing of images (result image) and the

metadata generated during the processing, and the associated personal data specified in point 2 are stored in the central data storage server of the Company.

4.3. User may request the deletion of the collected data using the Company's contact information. In this case Company deletes the data that's deletion was requested from the database, and informs the User about the deletion. The Affected may request the deletion of his/her data from the central server of the Company through the User.

4.4. The Company can be contacted by e-mailing the name and e-mail address. Company exclusively uses the messages for their intended purpose and after the processing has been completed, Company archives them.

## **5. Purpose and Duration of Data Controlling**

5.1 Company controls the data specified in this Policy with the following purpose:

- a) storage
- b) scientific research
- c) evaluation

Company stores the data specified in point 2 for quality assurance and product development reasons.

The purpose of scientific research is (i) the evaluation and further development of the product for the development of hand hygiene, and (ii) the analysis of the hand hygiene habits and the conclusions drawn from the observation of personal hand hygiene.

The data used for the purpose of scientific research are made anonymous, making the identification of the Affected impossible. When conducting scientific research, Company especially respects the rights of the Affected with regards to the protection of their personal data.

As soon as the purpose of the research allows it, the establishment of the connection between the personal data and the Affected is to be made impossible in an irreversible way. Until this happens, data suitable for the identification of any specific or specifiable natural person shall be stored separately.

5.2 Storage and controlling of personal data disclosed by the User is being performed for 5 years from the collection of the data or until they are deleted for the request of the User.

The deadline for deleting the data is 10 business days from receipt of the deletion request of the User.

5.3 In case of using unlawful and/or misleading personal data or any kind of wrongful act committed by the User and/or attacks against the system, Company is entitled to delete the data of the User upon the deletion of his/her account, and at the same time, if the suspicion of a wrongful act or civil liability arises, Company is also entitled to retain the data for the duration of the proceedings to be conducted.

5.4 Data captured automatically and technically are stored in the system for the time period starting at their generation that is necessary to ensure the operation of the system. Company warrants that these automatically recorded data cannot be linked to other personal data of Users, with the exception of cases where it is required by law. If the User withdraws his/her consent to the handling of the personal data of the Affected and requests the deletion thereof, his/her person will subsequently not be identifiable using technical data, with the exception of identification by investigating authorities and their experts.

## **6. Transmission and Other Use of Personal Data**

6.1. Personal data will not be transmitted to any third party.

6.2. The Court, the prosecutors and authorities may request the Company to provide information, to disclose or transmit data or to furnish them with documents.

6.3. If the authority has indicated the exact purpose and scope of the requested data, Company discloses personal data only to the extent essential for the realisation of the purpose of the request.

6.4. Company may use User's personal data and information that are lawfully stored by him during the resolution of eventual disputes or settlement negotiations and/or legal dispute between them.

## **7. Place of Data Processing and Data Controlling**

7.1 Company does not use the services of external data processors. If necessary, personal data handled by the Company are processed internally.

7.2. The place of data handling is the Company's site address: 1118 Budapest, Ménesi út 39/GF/1-2.

7.3. Data stored on the central data processing server specified in point 2 are only accessible to the Company's employees responsible for software development (read, write and delete) and the User (read only)

#### **8. Data Provided by External Service Providers and Third Parties**

8.1. Company does not use the services of external service providers for data collection. With regards to the personal data collected and provided by third parties, the scope of the Company's Privacy Policy is limited to the data received. Other than that, the third party's privacy policy prevails.

8.2 Company uses the services of external service providers for the operation of its services. External service provider may not use the data protected under this Privacy Policy.

#### **9. Amendment of the Privacy Policy**

9.1 Company reserves the right to make changes to this Privacy Policy unilaterally at any time.

9.2 User indicates acceptance of the current provisions of this Privacy Policy by using the Scanner, no additional consent is requested from individual Users.

#### **10. Enforcement of Rights**

10.1 User may exercise his right enforcement possibilities specified in the Information Act and Act V of 2013 on Civil Code at Court. Additionally, in any other issue arising in connection with personal data, User may solicit help from the National Agency for Data Protection (22/C Szilágyi Erzsébet fasor, Budapest 1125, mailing address: 1530 Budapest, PO Box. 5.)

10.2 Any questions or comments in connection with data handling can also be addressed to the Data Handler's staff. Contact us at [info@handinscan.com](mailto:info@handinscan.com).