

Data Processing Notice

This "Data Processing Notice" provides information about the processing of your personal data and your rights in relation to data processing, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (1) and the Information Act (2).

(1) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

(2) Act CXII of 2011 on the right to self-determination in relation to information and freedom of information (Infotv.)

Name of data controller:

Predor Systems Kft.

1113. Bp., Ábel Jenő utca 23.

25499878-2-43

info@predor.hu és support@predor.hu

Source of data processing	Scope of data processed	Purpose of data processing	Duration of data processing
Contact form (predor.hu)	-name -phone number -email address -company name	The purpose of data processing is to contact the user at their request Predor Systems Kft.	Until revoked
Contractual partners Including: - Own installations - Maintenance - Predor Cloud - Custom developments	- Name - Phone number - Email address - Company name - Position	For contracting, invoicing, and system follow-up	Until the contract or business relationship exists or is revoked
Non-contracted partners inquiries Among others: - Phone call - Support email inquiry	- Name - Phone number - Email address - Company name	The purpose of data processing is to contact the user at their request by Predor Systems Kft.	Until revoked
Newsletter subscriptions	-name -email address	The purpose of data processing is to inform subscribers about Predor Systems Kft. current news and events	Until revoked

Predor Software Operator / Administrator Registration	-name -email address	The purpose of processing this data is to enable Predor Systems Kft. to inform software users about changes to the Predor software, the General Terms and Conditions, and licensing.	Until revoked
Other data forwarded to Predor Systems Kft. or to which access has been granted Including: - End-user Predor or Otic software - End-user Predor or Otic software database - User list - Software log files - Photographs, videos, or screen recordings of software or hardware components	Any personal or company data that the sender expressly intends to forward to Predor Systems Kft. or provided access to Predor Systems Kft. and its employee(s).	Responding to and resolving questions, requests and demands arising from the contact person	Until revoked or until the question is answered or the problem is resolved

- The data involved in data processing may be accessed by the employees of Predor Systems Kft. This data will not be transferred to third parties and every effort will be made to prevent unauthorized access to the data by third parties.
- You have the right to request information from the Data Controller at the above address about what personal data Predor Systems Kft.
 - has collected about you,
 - on what legal basis,
 - for what data processing purposes,
 - from what sources,
 - how long it will be processed,

DATA PROCESSORS

Predor Systems Kft uses an external hosting provider as a data processor for the operation of the predor.hu and cloud.predor.hu websites,

Predor Systems Kft. uses an external hosting provider as a data processor for the Predor software operated by Predor Systems Kft. and the company's administrative systems.

Predor Systems Kft. treats user data as confidential and does not disclose it to unauthorized third parties without the user's consent.

Hosting provider details: RackForest Informatikai Kereskedelmi Szolgáltató és Tanácsadó Zrt. (1132 Budapest, Victor Hugo utca 11., 5th floor).

Data processor contact details: +36 1 211 0044, support@rackforest.hu

We would like to draw your attention to the fact that in the case of the Predor and Predor Cloud systems developed, distributed, and operated by Predor Systems Kft. end users regularly record the personal data of their employees and associates (name, telephone number, date of birth, email address, address, position, etc.) in the above software on a regular basis.

If these systems are operated by Predor Systems Kft., the company is also present as a data processor.

In such cases, the purpose of data processing is:

- To provide server hosting services to partners under contract with Predor Systems Kft. (Hosting of the Predor Enterprise system)
- To provide online working time recording system services to partners under contract with Predor Systems Kft. (Predor Cloud)
- To provide online working time recording system services to partners under contract with Predor Systems Kft.

Scope of data processing role:

- Until the contract or business relationship exists or the service is canceled

Other data:

In the case of Predor Enterprise software and Predor Cloud systems, the data controller has the option of requesting location data from users for the purpose of recording activities. In doing so, the software retrieves the location of the recording device from the browser. In doing so, the software retrieves the location data (GPS coordinates) of the device performing the recording from the browser and records it alongside the logged activity. This query only takes place at the moment the activity is logged; the software does not track the location data of the device, browser, or person before or after that.

SUPPLEMENTARY DATA PROCESSING INFORMATION

Marketing, Google Ads conversion measurement, and Enhanced Conversions

1. Purpose of the document

This supplement contains detailed information on Predor Systems Kft.'s data processing for marketing purposes, Google Ads conversion measurement, the use of the Enhanced Conversions feature, and remarketing activities.

2. Lead form data processing

Purpose of data processing:

Contacting, making offers, business communication.

Legal basis:

GDPR Article 6(1)(b) – steps taken prior to entering into a contract at the request of the data subject.

Data processed:

- name
- company name
- email address
- telephone number

Retention period:

We retain the data for the duration of the business relationship and for a maximum of 3 years after its termination, unless a longer retention period is required by law.

3. Data processing for marketing purposes

Purpose of data processing:

- measuring the effectiveness of advertising campaigns
- campaign optimization
- remarketing
- displaying personalized Google ads

Legal basis:

GDPR Article 6(1)(a) – voluntary and explicit consent of the data subject.

Consent:

- can be given via a separate checkbox,
- is not pre-checked,
- can be withdrawn at any time in the "Cookie settings" menu.

4. Google Ads conversion measurement

The website uses Google Ads conversion tracking to measure the effectiveness of ads.

The system may record:

- cookie ID
- device and browser data
- IP address (for technical purposes)
- conversion events (e.g., form submission)

Data processing only takes place if consent has been given for marketing cookies.

5. Enhanced Conversions

For more accurate conversion measurement, the Company uses the Google Ads Enhanced Conversions feature.

In doing so:

- the contact details provided on the lead form (name, email address, phone number)
- converted using one-way cryptographic hashing
- and transmitted to Google in this form.

Google matches the hashed data in its own system for the purpose of assigning conversions.

The hashed data cannot be used for direct identification in the Company's systems.

Data processing is carried out exclusively on the basis of the data subject's consent for marketing purposes.

6. Remarketing and profiling

If consent is given, website visitors may be added to remarketing lists.

As a result:

- Data subjects may see personalized Google ads on other websites.

This data processing constitutes profiling, which does not result in automated decision-making and has no legal effect.

7. Recipients

The recipients of the data are:

- Google Ireland Limited
- Google LLC (technology provider)
- Usercentrics (consent management system)

8. International data transfer

Within the framework of Google's services, data may be transferred outside the European Economic Area.

Data transfers are carried out with appropriate safeguards (Standard Contractual Clauses approved by the European Commission).

9. Withdrawal of consent

Consent for marketing purposes may be withdrawn at any time:

- in the "Cookie settings" menu available on the website
- or in writing to the data controller's contact details

Withdrawal does not affect the lawfulness of previous data processing.