# The Work App Data Management Information

## 1. Data Controller

Your personal data is processed by the following data controller as described in this notice:
**Company name:** Work Mit Uns Ltd.
**Registered address:** 2750 Csillag Street 6, 2750 Budapest, Hungary.
**Represented by:** Kasler Attila, Managing Director
**E-mail:** attila.kasler@theworkapp.eu
(hereinafter referred to as the “Data Controller”)

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## 2. Individual Data Processing Activities

**Purpose of processing:** To ensure the use of the system
**Scope of data:** Admin profile – name, e-mail address, phone number
**Retention period:** Until deletion
**Legal basis:** Our legitimate interest in performing the contract. You may object to the processing at any time using the contact details provided in section 1. [GDPR Article 6(1)(f)]
**Data subject rights:** 4.2., 4.3., 4.5., 4.7.

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**Purpose of processing:** Responding to inquiries
**Scope of data:** Data provided in the inquiry – name, e-mail address, other personal data
**Retention period:** 1 year
**Legal basis:** Consent given by submitting the inquiry. You may withdraw your consent at any time via the contact details in section 1. Withdrawal does not affect the lawfulness of processing before the withdrawal. [GDPR Article 6(1)(a)]
**Data subject rights:** 4.1.–4.6.

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**Purpose of processing:** Sending marketing or informational messages
**Scope of data:** Newsletter subscription – name, e-mail address
**Retention period:** Until unsubscribed
**Legal basis:** Consent given by subscribing. Consent can be withdrawn at any time using the contact details in section 1. Withdrawal does not affect the lawfulness of

processing before the withdrawal. [GDPR Article 6(1)(a)]
**Data subject rights:** 4.1.–4.6.

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**Purpose of processing:** Business contact
**Scope of data:** Contact person's details – name, position, e-mail, phone number
**Retention period:** As long as the relationship exists or until the contact person changes
**Legal basis:** Our legitimate interest in performing the contract and maintaining contact. You may object to the processing at any time using the contact details in section 1. [GDPR Article 6(1)(f)]
**Data subject rights:** 4.2., 4.3., 4.5., 4.7.

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**Purpose of processing:** Marketing or informational purpose
**Scope of data:** Facebook, YouTube, LinkedIn profile data
**Retention period:** Until unfollowed
**Legal basis:** Consent given by following. Consent can be withdrawn by unfollowing at any time. Withdrawal does not affect the lawfulness of processing before the withdrawal. [GDPR Article 6(1)(a)]
**Data subject rights:** 4.1.–4.6.

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**Purpose of processing:** Compliance with legal obligations
**Scope of data:** Personal data appearing on invoices and contracts
**Retention period:** 8 years
**Legal basis:** Required for retention due to tax and accounting laws after invoicing. Without providing the data, the service cannot be fulfilled. [GDPR Article 6(1)(c)]
**Data subject rights:** 4.2.–4.4.

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## 3. Data Processors and Other Data Controllers

### 3.1. Data Processors:

- **The system is operated, the server is provided, and the website editing and development** are performed by Work Mit Uns Ltd. (6 Csillag Street, 2750 Nagykőrös, Hungary)

  **The personal data is stored on our own servers**, located in the Dataland III. data center (H-1117 Budapest, Hauszmann Alajos Street 3.), with the services provided by ATW Internet Ltd (H-1138 Budapest, Esztergomi út 66. fsz. 1.).

- For invoicing, we use the system of Billingo Technologies Zrt. (1133 Budapest, Árbóc Street 6.)
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- IT infrastructure is provided by Work Mit Uns Ltd. (6 Csillag Street, 2750 Nagykőrös, Hungary)

### 3.2. Other Data Controllers:

- **Facebook and Instagram:** Meta Platforms Ireland Limited
  - https://www.facebook.com/privacy/explanation
  - https://www.facebook.com/help/instagram/155833707900388/

The Facebook and Instagram pages are operated by Meta, which provides ad display and page analytics services to the Data Controller.

- **YouTube:** Google Ireland Ltd.
  - https://policies.google.com/technologies/product-privacy?hl=hu
- **LinkedIn:** LinkedIn Ireland Unlimited Company
  - www.linkedin.com/legal/privacy-policy
- **Accounting:** Leadó Consulting Ltd. (75 Leadó Street, Szigetszentmiklós, Hungary)

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## 4. Rights

### Data Subject Rights

You have the rights described in sections 4.1 to 4.7.
If you wish to exercise any of these rights, please contact us using the contact details in section 1.

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### Identification

Before fulfilling your request, we must identify you. It is enough to provide a few personal data that we also have.

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### Response to the Request

After identification, we will provide information by mail or e-mail, depending on the form of your request.

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### Deadline for Administration

We will respond within 1 month from receiving your request.
If necessary – considering the complexity and number of requests – this period may be extended by 2 more months. You will be informed of the extension within the first month.

We will also inform you if no action is taken.
In this case, you can file a complaint with the NAIH (see point 5.1) or take legal action (see point 5.2).

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### Cost of Administration

Information and action based on your request are free of charge.
Exception: if the request is clearly unfounded or – especially due to its repetitive nature – excessive.
In such cases, we may charge a fee or refuse to act on the request.

### 4.1. You can withdraw your consent

If data processing is based on your consent, you may withdraw it at any time.
Withdrawal does not affect the lawfulness of processing that occurred before the withdrawal.

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### 4.2. You can request information (access)

You can ask to find out:

- What is the purpose of data processing?
- What personal data do we process?
- Who do we share the data with?
- How long do we keep it?
- What rights and legal remedies do you have?
- Where did we get your data from?
- Do we use automated decision-making based on your data?

If data is transferred to an international organization or a non-EU country, you may ask how we ensure appropriate protection.

You may also request a copy of your personal data (we may charge a fee for additional copies).

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### 4.3. You can request correction

You may request us to correct or complete any personal data that is inaccurate or incomplete.

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### 4.4. You can request deletion of your personal data ("right to be forgotten")

You can request deletion if:

- a) The data is no longer needed for the purpose of processing
- b) You have withdrawn your consent
- c) The data processing was unlawful
- d) You have successfully objected to the processing
- e) The law requires the data to be deleted

Data cannot be deleted if it is necessary:

- To ensure freedom of expression and access to information
- To fulfill a legal obligation
- To submit, enforce or defend legal claims

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### 4.5. You can request restriction of data processing

You may request restriction if:

- You dispute the accuracy of the data
- Processing is unlawful but you do not request deletion
- The purpose of processing no longer exists but you need the data for legal claims
- You have objected to processing (pending the outcome)

During restriction, we may only process the data:

- With your consent
- To submit, enforce, or defend legal claims
- To protect the rights of others
- For reasons of important public interest

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### 4.6. You can request the transfer of your data (data portability)

You can receive your personal data in a machine-readable format or request us to transfer it to another controller – if processing is based on consent or contract and carried out automatically.

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### 4.7. You can object to data processing

You may object to processing if the legal basis is the legitimate interest of the Data Controller or a third party.

In this case, we will delete the data unless we have compelling legitimate reasons or the data is needed to submit, enforce, or defend legal claims.

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## 5. Legal Remedies

### 5.1. You can file a complaint with the NAIH

If you believe that your personal data is processed in violation of the GDPR, you may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).

**NAIH**
President: Dr. Attila Péterfalvi
Mailing address: 1363 Budapest, Pf. 9.
Office: 1055 Budapest, Falk Miksa utca 9–11.
Phone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
Website: http://naih.hu
E-mail: ugyfelszolgalat@naih.hu

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### 5.2. You can go to court

If you believe your rights under the GDPR have been violated, you may file a lawsuit.

The case will be judged by a **regional court**.
You may also choose to start the lawsuit at the court of your **residence or place of stay**.

You can file the lawsuit even if you are otherwise not legally entitled to do so.
The authority (NAIH) may also join the case to support you.

The court procedure is governed not only by the GDPR, but also by the relevant rules of the **Civil Code (Act V of 2013, Book Two, Part Three, Chapter XII – §§ 2:51 to 2:54)** and other legal regulations.

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### 5.3. Compensation and non-material damages

If the Data Controller causes damage by unlawfully processing personal data, or violates your personality rights, you may claim compensation or non-material damages.

The Data Controller is not liable if it proves that the damage or violation was caused by an unforeseeable event outside its control.

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## 6. Data Security

We take all necessary steps to ensure the protection of personal data, considering:

- the current state of technology
- implementation costs
- the nature of the processing
- risks to individuals' rights and freedoms

Our goal is to provide a level of data security that matches the level of risk.

We always handle personal data **confidentially**, with the **highest possible resilience**, and ensure **restoration** in case of issues.

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"Accounting documents that directly or indirectly support the accounting records (including general ledger accounts and analytical or detailed records) must be retained for at least **8 years** in a readable format and in a manner that allows for retrieval based on references in the accounting entries."