

PRIVACY POLICY

PRIVACY POLICY

DATA OF THE CONTROLLER

Company name:	Growww Digital Kft.
Headquarters:	1075 Budapest, Madách Imre út 13-14.
Company registration number:	Cg. 01-09-403325
Tax number:	24383347-2-42
Represented by:	László Szabó managing director
E-mail:	finance@growwwdigital.com

In accordance with 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 flow of such data and on the repeal of Regulation 95/46/EC (General Data Protection Regulation) (April 2016) 27.) ("GDPR"), we provide the following information. This privacy policy concerns the data processing on the website <https://www.roiminer.com/>

The privacy policy is available from the following links:

- ☐ <https://www.roiminer.com/privacy-policy-en>
- ☐ <https://app.roiminer.com>

DEFINITIONS

- a) **personal data:** any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person can be identified.
- b) **data processing:** any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, organisation, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or other by way of making it available, coordination or connection, restriction, deletion or destruction.
- c) **data controller:** the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or together with others; if the purposes and means of data management are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be determined by EU or member state law.
- d) **data processor:** the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller.
- e) **recipient:** the natural or legal person, public authority, agency or any other body with whom the personal data is communicated, regardless of whether it is a third party. Public authorities that have access to personal data in accordance with EU or Member State law in the context of an individual investigation are not considered recipients; the handling of said data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of the data management.
- f) **third party:** the natural or legal person, public authority, agency or any other body that is not the same as the data subject, the data controller, the data processor or the persons who, under the direct control of the data controller or data processor, are authorised to process personal data they got.
- g) **registration system:** a file of personal data divided in any way - centralised, decentralised or according to functional or geographical aspects - which is accessible based on specific criteria.
- h) **data protection incident:** a violation of security that results in the accidental or unlawful destruction or loss of personal data transmitted, stored or otherwise handled,

results in its alteration, unauthorised disclosure or unauthorised access to them.

- i) **representative:** the natural or legal person with a place of business or residence in the European Union and designated in writing by the data manager or data processor pursuant to Article 27, who represents the data manager or data processor for the duties assigned to the data manager or data processor pursuant to this Regulation regarding obligations.
- j) **enterprise:** a natural or legal person engaged in economic activity, regardless of its legal form, including joint ventures and associations engaged in regular economic activity.

PRINCIPLES OF DATA MANAGEMENT

lawfulness, fairness and transparency The company handles the data legally and fairly, as well as in a transparent manner for the data subject (lawfulness, fairness and transparency).

1. Purpose limitation

The company only collects personal data for specific, clear and legitimate purposes, and does not process them in a way that is incompatible with these purposes (purpose limitation).

2. Data minimization

The company conducts data processing appropriately and relevantly in terms of its purpose(s) and limited to what is necessary (data minimization). Accordingly, the company does not collect or store more data than is absolutely necessary to achieve the purpose of data processing.

3. Accuracy

The company's data processing is accurate and up-to-date. The company takes all reasonable measures to ensure that inaccurate personal data for the purposes of data management are immediately deleted or corrected (accuracy).

4. Storage limitation

The company stores personal data in a form that allows the identification of the data subjects only for the time necessary to achieve the goals of personal data processing, subject to the storage obligation defined in the relevant legislation (Storage limitation).

5. Integrity and confidentiality

The company ensures adequate security of personal data by applying appropriate technical or organisational measures, including protection against unauthorised or illegal processing, accidental loss, destruction or damage of personal data (integrity and confidentiality).

6. Accountability

The business is responsible for compliance with the basic principles detailed above, and the business proves this compliance (accountability). Pursuant to this, the company ensures the continuous enforcement of the provisions of this internal regulation, the continuous review of its data management and, if necessary, the modification and addition of data processing procedures. The company prepares documentation to prove compliance with legal obligations.

7. "Privacy by design"

A very conscious approach to data protection, which means, in a very short summary, that both when determining the method of data management and during data management, the Data Controller implements appropriate technical and organisational measures - for example pseudonymization - to effectively implement the above principles, fulfil obligations, and incorporate legal guarantees etc. with its purpose, and it does all this in a regulated and detailed manner. In practice, the way of thinking is facilitated by employee education, data protection awareness, and the impact assessment, risk analysis, and interest assessment test used during the introduction and/or regular review of individual data processing.

DATA PROCESSING

1. Registration on the website <https://www.roiminer.com/>

The scope of the processed data and the purpose of the data processing	
Personal data:	Purpose of data processing:
E-mail address, telephone number:	Keeping in touch during the performance of the contract.
Name:	Identification of the data subject, Keeping in touch during the performance of the contract
Information about data management	
The range of data subjects	Data subjects who register on the website
Duration of data management, deadline for data deletion	Until the cancellation of the registration, immediately at the request of the data subject, by filling out a form or sending it by e-mail.
The person of the possible data controllers entitled to access the data, the recipients of the personal data	Personal data can be handled by the joint data controllers' customer service staff and other personnel involved in the performance of the ROIminer service, in compliance with the above principles.
Legal basis for data management	Performance of a contract with the data subject, Article 6 (1) point b)
Data processor used by the data controller	DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/

2. Informing the client about the services of Growww Digital Kft. and Results First Kft., direct marketing activity

The scope of the processed data and the purpose of the data processing	
Personal data:	Purpose of data processing:
E-mail address, telephone number:	Contacting the data subject directly in email and telephone to provide information about the joint data controllers' services.

Name:	Identification of the data subject, Contacting the data subject directly in email and telephone to provide information about the joint data controllers' services.
Information about data management	
The range of data subjects	Data subjects who register on the website
Duration of data management, deadline for data deletion	Until the withdrawal of the consent, immediately at the request of the data subject, by filling out a form or sending it by e-mail.
The person of the possible data controllers entitled to access the data, the recipients of the personal data	Personal data can be handled by the joint data controllers' sales and marketing staff, in compliance with the above principles.
Legal basis for data management	Consent of the data subject, Article 6 (1) point a)

Data processor used by the data controller	DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/ MailChimp - The Rocket Science Group, LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA https://www.intuit.com/privacy/statement/
---	--

3. Managing inquiries and contact requests received through the website <https://www.roiminer.com/>

The scope of the processed data and the purpose of the data processing	
Personal data:	Purpose of data processing:
E-mail address, telephone number:	Replying the inquiry and contact request
Name:	Identification of the data subject
Information about data management	
The range of data subjects	Data subjects who contact the joint data controllers through the website.
Duration of data management, deadline for data deletion	Until the withdrawal of the consent, immediately at the request of the data subject, by filling out a form or sending it by e-mail.

The person of the possible data controllers entitled to access the data, the recipients of the personal data	Personal data can be handled by the joint data controllers' customer service staff and other personnel involved in the performance of the ROIminer service, in compliance with the above principles.
Legal basis for data management	Consent of the data subject, Article 6 (1) point a)
Data processor used by the data controller	DigitalOcean LLC 101 Avenue of the Americas, 10th Floor New York, NY 10013 https://www.digitalocean.com/legal/terms/

4. Application of "Google Ads" conversion tracking

The data controllers use the online advertising program called "Google Ads", and also uses Google's conversion tracking service within its framework. Google conversion tracking is an analytics service of Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA; "Google").

When a user accesses a website through a Google ad, a cookie required for conversion tracking is placed on their computer. The validity of these cookies is limited and they do not contain any personal data, so the User cannot be identified by them.

When the user browses certain pages of the website and the cookie has not yet expired, both Google and the data controller can see that the User has clicked on the ad. From among the mass of users, individual users and those concerned cannot be identified, so personal data is not processed.

Each Google Ads customer receives a different cookie, so they cannot be tracked through the websites of Ads customers.

The information - obtained with the help of conversion tracking cookies - serves the purpose of creating conversion statistics for Ads' customers who choose conversion tracking. In this way, clients are informed about the number of users who click on their ad and are redirected to a page with a conversion tracking tag. However, they do not get access to information that could identify any user.

If you do not want to participate in conversion tracking, you can refuse this by disabling the installation of cookies in your browser. After that, you will not be included in the conversion tracking statistics.

Further information and Google's privacy statement are available at <https://policies.google.com/privacy>

5. Application of "Google Analytics".

The websites of the joint data controllers. use the Google Analytics application, which is a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer, thus facilitating the analysis of the use of the website visited by the user.

The information created by cookies related to the website used by the user is usually sent to and stored on one of Google's servers in the USA. By activating IP anonymization on the website, Google shortens the User's IP address within the member states of the European Union or in other states that are parties to the Agreement on the European Economic Area upon arrival at the server, but before writing to the background storage. (<https://support.google.com/analytics/answer/2763052?hl=en>)

The full IP address is transmitted to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the User used the website, to prepare reports related to website activity for the website operator, and to provide additional services related to website and Internet use.

Within the scope of Google Analytics, the IP address transmitted by the user's browser is not combined with other Google data. The User can prevent the storage of cookies by setting their browser accordingly, but please note that in this case, not all functions of this website may be fully usable. You can also prevent Google from collecting and processing the user's website usage data (including IP address) through cookies by downloading and installing the browser plugin available at the following link.

<https://tools.google.com/dlpage/gaoptout?hl=hu>

6. Application of "cookies" (cookie)

The fact of data collection, the scope of the processed data and the purpose of the data processing	
Unique identification number, dates, times	User identification and visitor tracking.
Information about data management	
The range of data subjects	All data subjects visiting the website.
Purpose of data processing	User identification and visitor tracking.

Duration of data processing, deadline for data deletion	Until the end of the relevant visitor session or a period of two years according to the regulations issued by Google Analytics: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
The person of the possible data controllers entitled to access the data, the recipients of the personal data	The data controllers do not manage personal data using cookies.
The rights of data subjects related to data management description	The data subject has the option to delete cookies in the Tools/Settings menu of the browsers, usually under the settings of the Data Protection menu item.
Legal basis for data management	Consent from the data subject is not required if the sole purpose of using cookies is the transmission of information via an electronic communication network or if the service provider absolutely needs it to provide a service related to the information society specifically requested by the subscriber or user.

7. Other data management

If a question arises during the use of our data management services, or if the data subject has a problem, you can contact the joint data controllers using the methods provided on the website (phone, email, social media etc.).

The joint data controllers process received e-mails, messages, on the phone, on Facebook etc. data provided, together with the name and e-mail address of the interested party, as well as other voluntarily provided personal data, will be deleted after a maximum of 2 years from the date of data communication.

We provide information on data management not listed in this information when the data is collected.

The joint data controllers are obliged to provide information, communicate and hand over data, or make documents available in the event of an exceptional official inquiry, or in the event of an inquiry by other bodies based on the authorization of the law.

In these cases, the joint data controllers only release personal data to the requester - if he/she has specified the exact purpose and the scope of the data - to the extent and to the extent that is absolutely necessary to achieve the purpose of the request.

DATA TRANSMISSION, DATA PROCESSORS

The hosting provider

1. Activity provided by data processor: Storage service
2. Name and contact information of data processor:

DigitalOcean LLC
101 Avenue of the Americas, 10th Floor New York, NY 10013
<https://www.digitalocean.com/legal/terms/>

3. The scope of the managed data: Name, email address and telephone number provided by the data subject.
4. Scope of data subjects: Data subjects who register on the website, data subjects who consent to direct marketing activities, data subjects who send contact requests or inquiries to the joint data controllers.
5. Purpose of data management: Making the website and the ROIMiner service available and operating it properly, direct marketing activities, answering contact requests, inquiries.
6. Duration of data management, deadline for data deletion: Data processing lasts until the termination of the agreement between the data controller and the storage provider, or until withdrawal of consent by the data subject in case of direct marketing activities.
7. Legal basis for data processing: Data subject's consent GDPR Article 6 (1) point a), performance of a contract with the data subject GDPR Article 6 (1) point b), and CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act 13/A. (3) of §

Email platform

1. Activity provided by data processor: Managing emails
2. Name and contact information of data processor:

MailChimp - The Rocket Science Group, LLC
675 Ponce de Leon Ave NE
Suite 5000
Atlanta, GA 30308 USA
<https://www.intuit.com/privacy/statement/>

3. The scope of the managed data: Name and email address provided by the data subject.
4. Scope of data subjects: Data subjects who consent to direct marketing activities.
5. Purpose of data management: Direct marketing activities by email.
6. Duration of data management, deadline for data deletion: Until withdrawal of consent by the data subject
7. Legal basis for data processing: Data subject's consent GDPR Article 6 (1) point a)

LEGAL REMEDIES

The data subject may request information about the processing of his personal data, and may request the correction of his personal data, or - with the exception of mandatory data processing - deletion, withdrawal, limitation of data processing, and he/she may exercise his/her right to data portability and objection in the manner indicated when the data was collected, or via the data controller's customer service.

Right to information

At the request of the data subject, the joint data controllers take appropriate measures in order to provide the data subject with all the information mentioned in Articles 13 and 14 of the GDPR and Articles 15-22 regarding the processing of personal data. and provide all information pursuant to Article 34 in a concise, transparent, comprehensible and easily accessible form, clearly and comprehensibly worded.

The data subject's right to access

The data subject has the right to receive feedback the joint data controllers as to whether his personal data is being processed, and if such data processing is in progress, he/she is entitled to access the personal data and the following information: the purposes of the data processing; categories of personal data concerned; the recipients or categories of recipients to whom or to whom the personal data has been or will be communicated, including in particular recipients in third countries and international organisations; the planned period of storage of personal data; the right to rectification, deletion or limitation of data processing and the right to protest; the right to submit a complaint to the supervisory authority; information about data sources; the fact of automated decision-making, including profiling, as well as comprehensible information about the applied logic and the significance of such data processing and the expected consequences for the data subject. In case of transfer of personal data to a third country or to an international organisation, the data subject is entitled to receive information about the appropriate guarantees for the transfer. The joint data controllers shall make a copy of the personal data subject to data processing available to the data subject. For additional copies requested by the data subject, the joint data controllers may charge a reasonable fee based on administrative costs.

At the request of the data subject, the joint data controllers provide the information in electronic form. The right to information can be exercised in writing via the contact details indicated on page 2 of this information.

At the request of the data subject – after valid proof of identity and identification
- information can also be given orally.

Right to rectification

The joint data controllers corrects the personal data if it does not correspond to the reality and the personal data corresponding to the reality is at its disposal.

Right to erasure

If one of the following reasons exists, the data subject is entitled to request that the joint data controllers delete the personal data relating to him/her without undue delay:

- ☐ personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- ☐ the data subject withdraws his consent, which is the basis of the data management, and there is no other legal basis for the data management;
- ☐ the data subject objects to data processing and there is no overriding legal reason for data processing;
- ☐ personal data were handled illegally;
- ☐ the personal data must be deleted in order to fulfil the legal obligation prescribed by the EU or Member State law applicable to the data controller;
- ☐ the collection of personal data took place in connection with the offering of services related to the information society.

Data deletion cannot be initiated if data management is necessary: for the purpose of exercising the right to freedom of expression and information; for the purpose of fulfilling the obligation under the EU or Member State law applicable to the data controller requiring the processing of personal data, or for the execution of a task performed in the public interest or in the context of the exercise of public authority conferred on the data controller; affecting the field of public health, or for archival, scientific and historical research purposes or for statistical purposes, based on public interest; or to submit, assert or defend legal claims.

The right to restrict data processing

At the request of the data subject, the joint data controllers restrict data processing if one of the following conditions is met:

- the data subject disputes the accuracy of the personal data, in which case the restriction applies to the period that allows checking the accuracy of the personal data;
- the data management is illegal and the data subject opposes the deletion of the data and instead requests the restriction of its use;
- the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to present, enforce or defend legal claims; or
- the data subject objected to data processing; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

If data management is subject to restrictions, personal data, with the exception of storage, will only be used with the consent of the data subject, or for the presentation, enforcement or defence of legal claims, or other it can be handled in order to protect the rights of a natural or legal person, or in the important public interest of the Union or a member state. The joint data controllers inform the data subject in advance about the lifting of restrictions on data management.

Right to data portability

The data subject has the right to receive the personal data concerning him/her provided to the data controller in a segmented, widely used, machine-readable format, and to forward this data to another data controller.

Right to object

The data subject has the right to object at any time for reasons related to his own situation to the processing of his personal data necessary for the performance of a task carried out in the public interest or within the framework of the exercise of public authority granted to the data controller, or the processing necessary to enforce the legitimate interests of the data controller or a third party, including profiling based on the aforementioned provisions too.

In the event of an objection, the data controller may no longer process the personal data, unless it is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are related to the presentation, enforcement or defence of legal claims.

If personal data is processed for direct business acquisition, the data subject has the right to object at any time to the processing of personal data concerning him/her for this purpose, including profiling, if it is related to direct business acquisition. In case of objection to the handling of personal data for the purpose of direct business acquisition, the joint data controllers will not process the data for this purpose.

Automated decision-making for individual cases, including profiling

The data subject has the right not to be covered by the scope of a decision based solely on automated data management, including profiling, which would have a legal effect on him/her or affect him/her to a similar extent. The above authorization cannot be applied if the data management is necessary for the conclusion or fulfilment of the contract between the data subject and the data controller; is made possible by EU or Member State law applicable to the data controller, which also establishes appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or is based on the express consent of the data subject.

Right of withdrawal

The data subject has the right to withdraw his/her consent at any time. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

Procedural rules

The joint data controllers inform the data subject without undue delay, but in any case within one month of receipt of the request, in accordance with Articles 15-22 of the GDPR. on measures taken following a request pursuant to Art. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months.

The joint data controllers shall inform the data subject of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request. If the data subject submitted the request electronically, the information will be provided electronically, unless the data subject requests otherwise.

If the joint data controllers do not take measures following the data subject's request, they shall inform the data subject without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action, as well as that the data subject may file a complaint with a supervisory authority and exercise his/her right to judicial redress.

The joint data controllers provide the requested information and information free of charge. If the data subject's request is clearly unfounded or - especially due to its repetitive nature - excessive, the joint data controllers may, taking into account the administrative costs associated with providing the requested information or information or taking the requested measure, charge a reasonable fee or refuse to take action on the basis of the request.

The joint data controllers inform all recipients of all corrections, deletions or data management restrictions carried out by it, to whom or to whom the personal data was disclosed, unless this proves to be impossible or requires a disproportionately large effort. At the request of the data subject, the data controller informs about these recipients.

The joint data controllers provide a copy of the personal data that is the subject of data management to the data subject. For additional copies requested by the data subject, the joint data controllers may charge a reasonable fee based on administrative costs. If the data subject submitted the request electronically, the information will be provided in electronic format, unless the data subject requests otherwise.

Compensation and damages

All persons who have suffered material or non-material damage as a result of a violation of the data protection regulation are entitled to compensation from the data controller or data processor for the damage suffered. The data processor is only liable for damages caused by data processing if it has not complied with the obligations set out in the law, specifically burdening the data processors, or if it has ignored the legal instructions of the data controller or those did the opposite. If several data controllers or data processors or both data controllers and data processors are involved in the same data management and are liable for damages caused by data management, each data controller or data processor is jointly and severally liable for the entire damage. The data controller or the data processor is exempted from liability if it proves that it is not responsible in any way for the event that caused the damage.

Complaint

If you have any questions or problems regarding the data management of the joint data controllers., please

feel free to contact our company at the contact information provided on page 2 of the information sheet.

Possibility of filing a complaint

You can file a complaint with the National Data Protection and Freedom of Information Authority against possible violations of the data controller:

National Data Protection and Freedom of Information Authority
1055 Budapest, Falk Miksa u. 9–11.
Mailing address: 1374 Budapest, Pf.: 603.
Phone: +36 -1-391-1400 Fax: +36-1-391-1410
E-mail: ugyfelszolgalat@naih.hu

This information came into effect on February 25, 2021.

Last modification: February 26, 2025.