

# **Informant on Data Processing Privacy Policy**

## **Version History**

- Original: Budapest, 29th October, 2019
- V2: Budapest, 24th of March, 2020: minor changes
- v 2.3 Budapest, 12th January, 2023, changes to cover Private and Office users, and new features, restructuring data processing activities, new description of Data Subject rights

This document extends Dartsee's General Terms and Conditions of Use ("GTCU") <https://www.dartsee.com/gtcu> and uses the same definitions introduced there.

The Privacy Policy below is applicable to the data controlling and data processing operations of Dartsee "system" (hereinafter referred to as **Service** or **Application**), and the dartsee.com domain (and its subdomains such as \*.dartsee.com) and to the systems developed by and supported by Service Provider.

## **I. Principles of Data Controlling and Data Processing**

1. Dartsee Ltd. (**Service provider, or Dartsee**) manages recorded personal data in accordance with the applicable data protection regulations - in particular with Regulation (EU)No 679/2016 known as the General Data Protection Regulation (GDPR), with the international conventions on data protection, with EU legal acts and other applicable legislation, and with this Privacy Policy.

Dartsee Ltd. is committed to protecting the personal data of the Data Subjects and therefore adjusts its data management practices to the applicable laws in force while protecting and respecting the private sphere of the Data Subjects.

2. Dartsee Ltd. only manages the specific personal data of the Data Subject, for the duration and for the purpose specified in this Policy, to which data management the Data Subject has consented or which is required or permitted by law.

3. Dartsee Ltd. takes all the necessary technical and organizational measures and establishes a procedural rule to ensure the security of the personal data provided or made available by the Data Subjects during the entire process of data management.

4. The terms used in this Policy should be interpreted according to the terms defined in the GDPR. The term „Data Subject” covers

- (i) both the representatives and service contact people of Dartsee's Clients
- (ii) , the Users(Users, Registered users) who use the System based on the authorization by the Clients, and
- (iii) all the people (administrators) involved in the distribution of the service of Dartsee (representatives and contact people of Distributors).

5. Dartsee Ltd. stores the imprint of passwords that are only suitable for password verification, but from which the password itself can not be restored.

## **II. Data controlling**

### **1. Details of the data controller**

Name: Dartsee Ltd.

Seat: 2083 Solymár, Vasút utca 15/d.,

Registration number: 26784744-2-13  
 Mail address: 2083 Solymár, Vasút utca 15/d., Hungary  
 E-mail: László Vass - data@dartsee.com

## 2. Data processors

Name	Task	Information
Application and database server	server	<a href="#">Amazon web services, Ireland data center</a>
Google Suite	Collaboration tool	<a href="https://policies.google.com/privacy?hl=hu">https://policies.google.com/privacy?hl=hu</a>
Google Analytics	web analytics	<a href="https://www.google.com/analytics/terms/us.html">https://www.google.com/analytics/terms/us.html</a>
Hotjar	web analytics	<a href="https://www.hotjar.com/legal/policies/priv">https://www.hotjar.com/legal/policies/priv</a>
Mixpanel	web analytics	<a href="https://mixpanel.com/legal/privacy-policy/">https://mixpanel.com/legal/privacy-policy/</a>
Hubspot	CRM	<a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>
Facebook	Online marketing	<a href="https://www.facebook.com/privacy/policy/">https://www.facebook.com/privacy/policy/</a>
WIX	Website builder	<a href="https://www.wix.com/about/privacy">https://www.wix.com/about/privacy</a>
szamlazz.hu	Invoicing	<a href="https://www.szamlazz.hu/adatvedelem/">https://www.szamlazz.hu/adatvedelem/</a>
Wise.com	Invoicing	<a href="https://wise.com/us/legal/privacy-policy">https://wise.com/us/legal/privacy-policy</a>

## 3. Purpose of the data controlling, legal basis and duration

Treated data and data controlling	The purpose of data controlling	The legal basis for data controlling	Period
The contact information of the representatives, contact persons of the Clients (name, email address, IP address)	To ensure the rightful use of the Service, identification of Client, keeping contact with Client during contract term, performance of the contract (including the sending of information and system messages about the Service and its development)	In case of legal person Clients: the legitimate interest of the Data Controller. A legitimate interest is to identify the Client and to keep in touch with the Client, to ensure the availability of the Service during the contract and to ensure rights and obligations under the contract.	During the existing of the business relationship and after the end of contract until 5 years (lapse of the general limitation period).

		In case of a natural person Client: data management is necessary for the performance of the contract with the Client.	
All information collected when a Client requests support of the Dartsee customer service (support tickets, emails and messages)	Providing support service, fulfillment of Clients' requests.	In case of legal person Clients: the legitimate interest of the Data Controller. A legitimate interest is to identify the Client and to ensure the availability of the Service during the contract.  In case of a natural person Client: data management is necessary for the performance of the contract with the Client.	12 months following the completion of the specified task.
Logging (logs): date of visit, IP address, data of the operating system version, browser type and version number, the address of the content received and the previously visited content.	For statistical and debugging purposes and to prevent abuses, in favor of the performance, and the checking of the Service.	Legitimate interest of the Data Controller. Legitimate interest is the technical operation of the Service, debugging, detection of unauthorized access, statistics training.	6 months
Database backups -saving of the entire database with all the data contained therein	For statistical and debugging purposes and to prevent abuses, in favor of the performance, and the checking of the Service.	Legitimate interest of the Data Controller. Legitimate interest is the technical operation of the Service, debugging, detection of unauthorized access, statistics training.	6 months

Handling user activity metrics.	For statistical purposes, to improve the system based on the metrics from the system, and to build a database about the user behaviour.	Based on the acceptance of Dartsee's GTCU and Privacy Policy by the user.	Personal data is anonymized 12 months after last activity.
Handling the data of Registered users including name, email address, profile picture.	Providing optional service, like detailed statistics or sharing features about the users' activity in the system (my.dartsee.com). The registration is optional in the system.	Based on the acceptance of Dartsee's GTCU and Privacy Policy by the user.	12 months after the last activity.
Handling the data of users	All the users, even temporary users register with an anonymous username, registered ones with their email address or facebook, google user. The system records game stats, and small video snippets using the front camera about the players connected to these user entities.	Based on the acceptance of Dartsee's GTCU and Privacy Policy by the user by playing on the system.	12 months after the last activity.
Memories page	A memory page is generated for the players about their session which contains game stats, profile pictures, and video snippets from the front camera.	The memories page is only shared if at least one user scans its QR code on the system or registers with an email address to which the system sends the page's url after the session.	12 months after the last activity.
Sales contact form data: name, email address	Visitors of dartsee.com can fill out a form to receive more information about the system.	Based on the acceptance of Dartsee's GTCU and Privacy Policy by filling out the form.	12 months after the last contact.

Billing information for home users	Home users pay directly to Dartsee, therefore their payment information should be processed.	Based on the acceptance of Dartsee's GTCU and Privacy Policy by the user by playing on the system.	6 months following the last payment.
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#### 4. Rights regarding data protection, remedies

**In relation to the data management, Data Subjects have the following rights:**

**Right of access to your personal data:** You have the right to receive feedback from the Data Controller about whether your personal data is being processed and, if such data is being processed, you are entitled to have access to your personal data and all the relevant statutory information. Therefore, you have the right to contact the Data Controller and request information about your data management and request access to your data.

**Right of rectification:** In the event of a change in your data, you may at any time request rectification of your data by providing correct information.

**Right to the erasure of data:** You are entitled to request the Data Controller to delete your data if the data management is no longer necessary for the purpose for which the data were recorded, if the processing is unlawful or if the deletion is required by law.

**Right to restrict data management:** You may request a restriction of data management if the data processing is unlawful or if the Data Controller no longer needs the data for the purpose of data management, but you wish to use it for the submission of a legal claim. Restricting data management means that the data can only be stored until the restriction is lifted and can only be used to bring a legal claim.

**Right to object to processing of personal data:** You are entitled to object to the processing of your personal data at any time for reasons related to your own situation. In such a case, the Data Controller will individually examine whether there is a legitimate reason justifying the need for data management.

**Right to data portability:** You are entitled to receive from the Data Controller the personal data it processes about you, in a structured, commonly used and machine-readable format and you shall have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided. When exercising the right to portability of data, you are entitled to request, if technically feasible, the direct transmission of personal data between controllers.

**Right to file a complaint to the Supervisory Authority:** You are entitled to file a complaint with the National Authority for Data Protection and Freedom of Information (contact: 1055 Budapest, Falk Miksa utca 9-11., 1363 Budapest, Pf. 9.; phone: +36 1 391-1400; telefax: +36 1 391 1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)) or to the data protection authority based on your residence as a natural person.

**Judicial Enforcement:** You have the right to apply to the court if you consider that the Data Controller or the Data Processor acting on its behalf or acting on its instructions manages your personal data in violation of the requirements for the processing of personal data.

**Right to withdraw consent:** in case of consent based data processing the consent may be withdrawn at any time by written notice sent to [data@dartsee.com](mailto:data@dartsee.com). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**a. Notification of complaint or claim at the Data Controller**

Complaints or claims may be reported on the following addressee:

Mail address: Dartsee Kft, 2083 Solymár, Vasút utca 15/d., Hungary

E-mail: László Vass [data@dartsee.com](mailto:data@dartsee.com)

**III. Cookies**

You can find a detailed description of cookies here: [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie). Cookies used to provide Dartsee service:

Name of the cookie	Function	Duration	Stored data, information
Google Analytics on dartsee.com, my.dartsee.com	attendance measurement	26 months	Google Inc.'s "Privacy Policy" <a href="http://www.google.hu/intl/hu/policies/privacy/">http://www.google.hu/intl/hu/policies/privacy/</a> available on the website. You can find more useful information about Google Inc.'s activity on Google Inc. and how to disable cookies and personalize your ads: <a href="https://adssettings.google.com/anonymous">https://adssettings.google.com/anonymous</a>
Hotjar on dartsee.com	behaviour and attendance measurement	365 days	The stored cookies can be found in Hotjar's Cookie policy: <a href="https://www.hotjar.com/legal/policies/cookie-information">https://www.hotjar.com/legal/policies/cookie-information</a> available on the website.
Dartsee cookie on dartsee.com, my.dartsee.com	Authenticating registered users	365 days	User accepted cookie policy, _gid
filesusr.com/	Website visitors	365 days	Wix (CMS) content delivery network cookie.

If you do not accept the use of cookies or would like to partially restrict them, please disable them by changing your browser settings so that the cookies cannot be placed on your computer.