

# Privacy policy and legal notice

(Last modified 3 October, 2022)

Privacy Policy for Customers, Suppliers, Business Persons, Website and Application Visitors, Employees and Applicants

## 1. Overview

Welcome to the [www.spaceabc.space](http://www.spaceabc.space) website (including its subdomains, contents, trademarks and services, referred as “**website**” hereinafter).

### Who we are?

The rights to dispose, including operation and maintenance of the SpaceABC Application and the website are fully owned by SpaceABC Ltd. (located at Budakeszi, Gesztenye sor 11., 2092., Hungary, tax number: 27764897-2-13, registration number: 13 09 218628, hereinafter referred as „SpaceABC” ).

Protecting the security and privacy of your personal data is important to us. For this reason, SpaceABC processes personal data in compliance with applicable laws on data protection and data security according to applicable data protection and data security law, especially in accordance with **General Data Protection Regulation** (EU) 2016/679 (**GDPR**) of European Parliament and European Commission, and the Hungarian Act CXII of 2011 Informational Self-determination and Freedom of Information.

BY USING THE WEBSITE OR OUR WEB APPLICATION, YOU AS A USER ARE AGREEING TO THE PRACTICES AS STATED IN THIS POLICY (AS UPDATED OR AMENDED FROM TIME TO TIME) AND OUR TERMS OF USE. USING OUR WEBSITE OR WEB APPLICATION YOU DO GIVE YOUR CONSENT TO PROCESS YOUR PERSONAL DATA ACCORDING TO TERMS AND CONDITIONS STATED IN THIS POLICY. IF YOU DO NOT AGREE TO THE TERMS AS STATED ABOVE, PLEASE STOP USING THIS WEBSITE OR WEB APPLICATION IMMEDIATELY.

## 2. Scope

This Privacy Policy applies to all the personal information we collect about you when you interact with us through our website, applications or other forms of communication.

These interactions may occur when you:

- visit our website;
- use our web app;
- use or purchase our products or services;
- subscribe to our newsletters, participate in our online communities, games and other competitions;
- contact our customer support;
- request information specific to your interests;
- offer us products or services;
- interact with us as an employee or applicant.

### **3. Information we may collect about you**

We may process several types of personal information about you depending on your capacity as e.g. a consumer, customer or business partner, and the ways you interact with us.

If you choose not to provide us with your personal information, please understand that we might not be able to provide you with the requested product, service, solution or respond to some of your requests.

#### **3.1. Information you provide to us**

Contact information (name, address, email, telephone etc.);

Account login information: usernames, passwords;

General Business information such as address, contact person, invoicing and other payment information, delivery information.;

Reviews, feedback, comments;

Audiovisual information, such as images or video;

Recruitment data: CV, application forms, letters of recommendation, languages, qualification, certifications, trainings, and other professional licenses, etc.;

Talent management information, such as employment and education history, other details included in the CVs; professional qualifications and experience, performance and development programs and reviews and career development plans, etc.

Information regarding your health, health goals, body measurements, allergies, activity level, taste in food, food intake, exercise, sleep, and other information that you voluntarily provide us.

Information which part of the voluntary health tests as provided in the application, including answering questions about your age, date of birth, gender, ethnicity, dietary and medical history, family health history, exercise history and body measurements.

Information that you provide us by means of our App, such as, without limitation, feedback and responses to recommended dishes, menus, recipes, packaged foods and restaurant meals, and when you make purchases of food and/or make reservations at restaurants.

#### **3.2. Information we automatically collect about you**

Traffic information such as time and/or duration of your interaction with us

IP address, MAC address of the devices with which you interact with us.

Location information (meaning your actual location defined by the information mentioned above);

Information related to your interests (products or services that you are visiting on our website platforms);

Cookie preferences.

### **4. Why do we collect your personal information?**

Depending on the role/objective you may have when you visit the Site /use the Application, we may collect personal information for different purposes.

**Services:** Your information may be required in order to provide you with the requested goods or services or to fulfil other purposes which you have requested from us, as well as further develop, customize and improve our services.

**Support:** Providing you with customer support, responding to your questions or requests, to maintain account security and for other website or app maintenance reasons.

**Marketing:** To facilitate direct marketing, promotions, newsletters and website analysis.

**Legal:** Performance and execution of contracts, due diligence and compliance with our legal obligations.

## 5. Why do we need your data?

Under Article 6 (1) of the GDPR, we are only permitted to process your data if there is a legal basis to do so. A legal basis for processing your data will arise when one or more of the following conditions apply:

- You have provided your consent to the processing, when required according to applicable data protection laws;
- The processing is necessary for the facilitation of the performance of our contractual obligations arising from your employment contract;
- In compliance with applicable legal obligations;
- The processing is necessary for the purposes of the legitimate interests pursued by SpaceABC or by a third party, except where your interests or fundamental rights and freedoms which require protection of personal data override such interests;
- The processing is necessary for the protection of vital interests of any natural person.

## 6. How long we keep your data?

We retain your personal information as long as it is necessary to fulfil the specific purposes, as explained under the section “Why we collect your personal information”. In specific cases, a longer retention of your personal information might be required according to legal obligations. We keep your data until it is required according to period of prescription, duration of storage and retention period set by civil law, tax law and accounting rules.

## 7. Third parties and online links to other sites

This Privacy Notice applies exclusively to SpaceABC and the products or services of SpaceABC, and not to other websites or applications operated by third parties.

We do not integrate any social media plugins directly into our website. Therefore, your data will only be transferred to the extent that we additionally inform you on our Cookie Policy. Our website may contain links to social media or other third-party sites or applications. SpaceABC is not responsible for the privacy practices of such other websites or applications. We recommend that you review the privacy policy of any third-party sites or links you may choose to visit for further information.

### Additional Third-Party Information

You may connect our Services to Third-Party Applications or Devices. If you use the Services by logging on through a social media account and/or a Third-Party Application or by connecting to a Third-Party Application or third-party device we may also receive personal information about you which is provided by such social network, Third-Party Application, and/or Third-Party Devices including information regarding health, lifestyle and exercise activities.

Please check the policies of such social network, Third-Party Application and/or third-party devices in order to understand what information we receive.

If we will enable direct payment through our Services, we will collect and store billing and credit card information.

We also use third-party service providers and business partners in the health, medical and/or fitness field to offer you additional products and services. If you choose to use these products or services, we may share your personal data with them to the extent necessary for such providers to offer you their products or perform their services. Accordingly, we encourage you to review any third-party's privacy policy for further information.

## **8. Cookies**

When you visit our websites or in our digital platforms in general, cookies might be stored on your devices within the web browser. Cookies are small text files that can store information for a certain period and identify your device. We use cookies in order to provide you the possibility to use our platforms in an easy way tailored to your interests and preferences.

Please read our Cookie Policy and learn more on how we use cookies or other tracking technologies.

## **9. Data security**

We take reasonable steps to implement appropriate technical and organizational measures to protect your personal information. These measures are in compliance with applicable data protection and data security laws and are in place to prevent any risks, such as accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal information.

Our measures to protect your data include:

- limiting physical access to our premises;
- limiting access to personal information;
- requiring third-party providers to have acceptable security measures to keep personal information secure; and
- putting in place physical, electronic, and procedural safeguards in line with industry standards.

## **10. Sharing your data with third parties**

SpaceABC does not sell or license your personal information to third parties.

We do not share your personal information with third parties except in specific cases, where an appropriate legal basis exists.

We may disclose your personal information to:

- SpaceABC parent company and affiliates. SpaceABC as an international corporation might share your personal information with its several SpaceABC affiliates, as well as with associated companies and related undertakings.
- External service providers such as consultants, advisors and auditors. We may also share your data with trusted service providers who support us in providing you with services such as IT services, marketing, finance, advertising, archiving and document storage.
- Other contracted business partners
- Public or governmental authorities as required by applicable laws and regulations.

Where required by law, the appropriate data processing agreements have been concluded with these third parties.

## **11. Data transfer outside the European Union**

In some cases, we may transfer personal data to our affiliates, service providers or partners to third countries outside the EU. Regardless of the laws in place in these countries, we will treat the privacy of your information in accordance with this Privacy Policy.

In each case, we ensure that an appropriate level of data protection according to European standards according to Art. 46 GDPR is in place.

### **Consent to worldwide transfer and processing of Personal Data**

By providing Personal Information to us through this Website, you agree that it may be used by SpaceABC and our Affiliated Parties for the purposes described herein, and you further understand and consent to the collection, maintenance, processing and transfer of such information.

By providing your Personal Data to this Website, you consent to us transmitting and processing your information in any jurisdiction, in accordance with this Privacy Policy.

## **12. Assignment, Change Of Control, And Transfer**

All of our rights and obligations under our Privacy Policy are freely assignable by us to any of our affiliates, in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or new owner.

## **13. Minors**

According to the Terms of Use the website and the application is only intended for individuals aged 14 years or older. For minors who are legally incapacitated (eg. under 14 years) visiting or using the website and the application is not permitted, therefore we do not process their data.

If you have only limited legal competence (like minors over 14 and under 18 years of age), then you must review these Terms with you parent or guardian before visiting or using the Site or Application to make sure that you and your parent or guardian understand these Terms and agree to them.

If you are between the age of 14-18, talk to your parents or legal guardians and obtain their consent before sharing your personal information with us.

If you are a parent or legal guardian of a child between the age of 14-18, we ask that you supervise your children's use of our products or services (including websites and other digital platforms) and make sure that your children do not and will not share any personal information with us without asking your permission to do so.

## **14. Your rights for data protection in the EU**

As a data subject, you have certain rights as relates to the processing of your personal data. These rights include the right to request:

- Access and modification of your personal information
- Deletion of your personal data (unless we are legally required to retain the information).
- Restriction of or objection to the processing of your information.
- A copy of your personal information in a structured, commonly used and machine-readable format

- You may exercise these rights by contacting us directly. All questions or requests regarding personal data should be sent to:

Address: HU-2092 Budakeszi, Gesztenye sor 11.

Phone number: +36 30 3 464-454

E-mail: [info@spaceabc.space](mailto:info@spaceabc.space)

Upon receiving your request or questions, you will be asked to verify your identity and specify which kind of information you require.

SpaceABC aims to ensure that your request will be addressed within one month and free of charge unless a disproportionate effort is required.

You can submit a claim to SPACEABC to access, correct, delete limit data processing of your personal data. You can also submit an objection against data processing and you can claim your right for data portability. If you believe that the processing of your data is in conflict with the data protection legislation, you also have the right to contact your local data protection authority and you can withdraw your consent at any time.

You can submit your complaint to National Authority for Data and Freedom of Information (Budapest, 22/c Szilágyi Erzsébet fasor, 1125 HU, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) ).

#### **Our Data Protection Officer**

You also have the right to contact our data protection officer.

The contact details of our data protection officer are as follows:

Zsuzsanna Benyo

Tel.: +36 30 3 464-454

E-Mail: [info@spaceabc.space](mailto:info@spaceabc.space)

Web: [www.spaceabc.space](http://www.spaceabc.space)

#### **SPACEABC Cookies policy**

***(Last Updated: 03 October, 2022.)***

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TERMS AS STATED ABOVE, PLEASE STOP USING THIS WEBSITE OR WEB APPLICATION IMMEDIATELY.

Who are we?

This Website and Web Application is operated by SPACEABC Ltd. (Corporate reg.13 09 218628; located at: 2092. Budakeszi, Gesztenye sor 11.; Tax reg.no: 27764897-2-13,). As used in this Cookie Policy, the terms “SPACEABC”, “we”, “us” and “our” refer to SPACEABC Ltd, and all entities it controls, is controlled by or is under common control with, including parents, affiliates, and subsidiaries, which under this Privacy Notice may act as a Controller.

This Cookie Policy explains what cookies are and how we use them. You should read this policy so you can understand what type of cookies we use, the information we collect using cookies and how that information is used. For further information on how we use, store and keep your personal data, see our Privacy Policy. This Policy also tells you what your rights are in relation to the personal data you give to us.

What are cookies?

Cookies are small pieces of infocommunication data that are stored and read in your end-device. Cookies may contain data that enables the recognition of the device being used. However, in some cases, cookies only contain information on certain settings which are not considered to be personal data. Cookies work to make your experience browsing our site as smooth as possible and they remember your preferences so you don't have to insert your details again and again.

We use cookies to process your personal data in accordance with to Art. 6 para. 1 S. 1 lit. a GDPR (consent) or Art. 6 para. 1 s. 1 lit. f GDPR (legitimate interest).

There are different types of cookies. Some cookies come directly from our website and others come from third parties which place cookies on our site.

Cookies can be stored for varying lengths of time on your browser or device. Session cookies are deleted from your computer or device when you close your web-browser. Persistent cookies will remain stored on your computer or device until deleted or until they reach their expiry date.

We have 4 varieties of cookies which operate on our website:

Essential Web Cookies

Some cookies are essential for you to be able to experience the full functionality of our site. Please note that without these cookies, our web site may not be displayed optimally and some functions are then no longer technically available.

Functionality cookies

These cookies allow our site to remember your preferences, helping you to customize and optimize your experience on our site. We use the cookie consent cookie to remember your preferences according to the use of cookies on our website. That way, we can remember you when you return to our site.

## Targeting cookies

We use targeting cookies in order to offer you advertising on other websites, that are tailored to your interests and helps us to track the effectiveness of our ad campaigns on third party websites. They are usually placed by third-party advertising networks with a website operator's permission but can be placed by the operator (first-party cookie).

## Analytical/performance cookies

We use analytical cookies to create pseudonymous user profiles for improving and designing our website on demand. Analytical cookies tell us how you use the website and we can provide you with the best experience.

## Cookie Preference Management

Please be aware that you can set your browser to inform you when cookies are being stored or used on the website you are visiting. Thus, any use of cookies is transparent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you proceed accordingly you may not be able to benefit from the full functionality of this website and that you may lose any preferences.

## Third Party Cookies

Google Analytics by Google, Inc.

Google Analytics is an analytical cookie to evaluate the use of the website and to compile reports on website activities.

We have activated IP-anonymization on this website, your IP address will be truncated within the area of Member States of the European Union.

You can withdraw your consent by downloading and installing the Google Analytics browser plug-in (<http://tools.google.com/dlpage/gaoptout?hl=hu>) or if you click the box below which stores an opt-out cookie on your browser: [Click here to opt-out to Google Analytics.](javascript:gaOptout())

## Albacross

Albacross Nordic AB is a business Website Tracking Service, which enables companies to get more accurate information about companies visiting their website.

By accepting this Policy, you agree that the Albacross Nordic AB („Albacross”) can process your personal data. By placing cookies on your device and collecting data classified as personal data, is processed by Albacross, which has operating locations in Stockholm and Warsaw, providing lead identification and targeting services.

The purpose of processing personal data is to enable Albacross improve the service provided by us/by our website („Lead generation” service) in a way to add data to its corporate databases.

The data that is collected and used to achieve this purpose is information about the IP-address from which you visited our website, and technical information that enables Albacross to tell different visitors apart that are originating from the same IP-address (cookies). Albacross stores domain information from filled forms to assign the IP address properly.

Further information about data protection policy of Albacross can be found on the link <https://albacross.com/privacy-policy/> .

### Wix Analytics

Wix Analytics is a business Website Tracking Service, which enables companies to get more accurate information about companies visiting their website.

By accepting this Policy, you agree that the Wix Analytics („Wix”) can process your personal data. By placing cookies on your device and collecting data classified as personal data, is processed by Wix, which is providing lead identification and targeting services.

The purpose of processing personal data is to enable Wix improve the service provided by us/by our website („Lead generation” service) in a way to add data to its corporate databases.

### Data Protection Officer

For further information regarding data protection or our use of cookies, you may contact our Data Protection Officer using the details below:

Zsuzsanna Benyo

Tel.: +36 30 3 464-454

E-Mail: [zsuzsanna.benyo@spaceabc.space](mailto:zsuzsanna.benyo@spaceabc.space)

Web: [www.spaceabc.space](http://www.spaceabc.space)

### Legal Declaration

*SpaceABC LTD. informs you that by visiting our site you accept the terms and conditions detailed below. Should you disagree with those terms and conditions please do not open the pages of our website.*

Copyright

All names, logos, information text, documents and any related graphics appearing on the www.SpaceABC.space site are copyright protected material and one should not use, copy, print, store, distribute or publish any content appearing on this site without prior written permission of SpaceABC LTD.

#### Information

All material appearing on this site, including information, data, conditions, definition or description is published for information only, and the user shall take all liability for the use of any such material. SpaceABC LTD. therefore accordingly shall not be made liable for the accuracy and validity of any material or any indirect or consequential misunderstanding, loss or damage arising out of or in connection with the use of such information. Please contact us for further information and to avoid any misunderstanding.

#### Disclaimer

SpaceABC LTD. shall not be made liable for any damages related to the use of our site, either occurring from the use of this site, or as a result of any malfunction, omission, error, operational problem, virus or other malicious code of this site, or the malfunction of the data transmission channel.

SpaceABC LTD. reserves the right to change, review and update this site or restrict granting access to the site. Our site contains links to external websites. We cannot and has not reviewed all of the sites linked to this site and therefore we cannot be made liable for their content, as their data is managed independently. We store and control the data collected from you on our site in a protected environment and use technical and organisational solutions to protect privacy and prevent any illegal use. We do not disclose your data to third parties without your prior consent.

#### Third Party material

SpaceABC LTD. shall not be made liable for any material and information which are linked to our site but created or published by third parties.