

PRIVACY STATEMENT

FOR THE USE OF THE WEBSITE OF ASURA

Please read the following Privacy Statement to understand how we use and protect the personal information that you provide to us. For the purposes of the present Privacy Statement, **APS Solutions Ltd.** (1051 Budapest, Széchenyi István tér 7-8. C. ép. 4. Em., Hungary; company registry number: 01-10-142417, hereinafter referred to as “Asura”) acts as Data Controller.

If you provide Asura with personal data via our website, the following Privacy Statement is to inform you how Asura processes personal data which is subject to the EU General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 – hereinafter referred to as “GDPR”).

This Privacy Statement shall be valid for the website <https://apssolut.com> operated by us (the “Website”).

General principles for processing personal data

The regulation regarding processing of personal data provides a framework to ensure that personal data is handled properly. Asura will always ensure that personal data is:

- Processed fairly, lawfully, and transparent
- Adequate, relevant, and not excessive
- Accurate and up to date – inaccurate or incomplete personal data will be rectified or erased or further processing suspended
- Not kept for longer than is necessary
- Processed only for a specific, explicit, and legitimate purpose and only processed in line with the purpose for which it is gathered
- Secure

Types of personal data

We will collect and process your personal data in a number of ways when you engage with us via various channels, including our Website.

Some of the personal data is necessary to process to provide you with the services you have requested, and some personal data you can choose to provide voluntarily. We will always let you know which personal data is necessary and the consequences of not providing such data to us, for instance that we will not be able to (fully) satisfy your request.

The personal data that we collect and process can generally be divided into the following categories:

- Contact information such as name, address, phone number, email address, title, place of work, etc.
- Information that you provide when contacting us via online contact forms
- Profile information in case you create a profile or account with us, including username and encrypted password
- User information, e.g. technical data regarding use and viewing, including IP addresses when you visit our website, including on third party sites, see also clause 5 below

We do not collect and process special categories of data such as race or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic/biometric data, sexual orientation, and/or health.

Our purposes for processing your personal data

We only process your personal to pursue a legitimate purpose and generally we will only process your personal data if:

- You have provided your consent to such processing; or
- The processing is necessary for the performance of a contract; or
- The processing is necessary for compliance with a legal obligation that we are subject to; or
- The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party and such processing is not considered to be harmful towards you, such as our interests in developing, evaluating, marketing and selling our products and services, pursuing, developing and maintaining business relationships with our customers, suppliers and other business relations.

We process your personal data for the following purposes:

- To facilitate your use of the website, our services, and products.

- To contact you as part of the ordinary customer relationship.
- To send you newsletters or other marketing material.
- To provide general customer service and support.
- To gain customer insights and knowledge of how our various services, including websites and applications are used as well as evaluation and improvement hereof.

Opt-in

The website provides users with an opt-in opportunity, which means that you will decide if you wish to receive our newsletters, special offers, and other information about new features, events, and services. Marketing offers will be described to you prior to the data collection, and your consent will be required before any marketing material is being forwarded to you by e-mail. If you wish to be removed from a mailing list and thus not receive future communications on a particular subject, please click the unsubscribe link in the bottom of the email you wish to unsubscribe from it. We hereby inform you that if you enter into a contractual relationship with us (becoming the user of one of our services), you will regularly receive a circular on email about new information related to the service or product that you use. Since this circular will not contain any marketing material which promotes the selling of any service or product, the circular does not fall under the definition of direct marketing provided through electronic means, according to Section 6, Subsection (1) of the Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

Cookies

We use cookies on our website. If you want to learn more about the use of cookies, please read the following subsections.

Cookie Policy for Asura Technologies

This is the Cookie Policy for Asura Technologies, accessible from <https://apssolut.com/>

What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the site's functionality.

For more general information on cookies see the [Wikipedia article on HTTP Cookies](#).

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

The Cookies We Set

Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

Forms related cookies

When you submit data through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

Site preferences cookies

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

Third Party Cookies

In some special cases, we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the [official Google Analytics page](#).

From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features, these cookies may be used to ensure that you receive a consistent experience while on the site while ensuring we understand which optimizations our users appreciate the most.

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Linkedin, Facebook, Youtube, and Twitter that will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site. This Cookies Policy was created with the help of the Cookies Policy Template Generator and the Terms and Conditions Template.

However, if you are still looking for more information then you can contact us through one of our preferred contact methods:

Email: info@asuralpr.com

Guide: <https://www.cookiepolicygenerator.com/eu-cookies-directive-gdpr/>

Cookie	Name	Presistence	More information
Facebook	_fbp;	Presistence	Facebook Privacy Policy
Google Analytics	_gid; _gat_UA-; ga; _ga;	Presistence	Google Analytics Privacy Policy
Google Tag Manager	_gcl_au;	Presistence	Google Tag Manager Privacy Policy

Disclosure, transfer, and making available of personal data to third parties

Our disclosure and transfer of your personal data to third parties are kept to a minimum and are subject to the existence of an adequate level of data protection. We may disclose or make personal data available to third parties under the following circumstances:

- Third parties carrying out services on our behalf, e.g. accounting. Such third parties are only allowed to process the personal data in accordance with our instructions and under a written data processor agreement.
- To establish, exercise or defend our legal rights.
- If you have provided your prior consent to the disclosure of personal data to a third party.

If the recipient of the personal data is located in a country outside the EU/EEA not ensuring an adequate level of data protection, we will only transfer your personal data to such recipient following execution of a written transfer agreement based on the EU Commission's Standard Contractual Clauses.

Your consent

As stated above, some of our processing activities will be based on your consent. In such case, you will have the right to withdraw your consent at any time.

If you withdraw your consent, we will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to the applicable personal data legislation or other applicable laws and regulations.

Please note that the withdrawal of your consent will not affect the lawfulness of processing conducted prior to the withdrawal.

Security

Asura commit to have in place the appropriate security measures to safeguard the security of your personal data, and the Website has security measures in place to protect against the loss, misuse, and alteration of the personal data under our control.

Your rights

You as a data subject may ask for information on the data processing according to Art. 13 of GDPR. You have the right to access your personal data and the related information detailed in Art. 15. According to Art. 16 you can ask for the rectification of your personal data, pursuant to Art. 17 you have the right to obtain from the controller the erasure of your personal data. In accordance with Art. 18 you shall have the right to obtain from the controller restriction of processing, and based on Art. 21 you have the right to object. Under the conditions described by Art. 20 you have the right to data portability. These rights are not absolute ones, therefore the requests based on these may be fulfilled only under the conditions detailed by the above-referred provisions of GDPR.

Complaints

If you have any complaints about the processing of personal data carried out by Asura, please feel free to contact us at any time, see section 11.

We will review and assess your complaint, and if necessary, we may contact you to obtain further information. We will always acknowledge receipt of your complaint or objection within 5 business days.

We strive at processing any complaint or objection within one month. If it is not possible to make a decision within one month, we will inform you of the grounds for the delay and of the time at which the decision can be expected to be provided (not exceeding 6 months from receipt).

Pursuant to Section 22 of the of Act CXII of 2011 on Information Self-determination and Freedom of information (the “Privacy Act”), in case data subject’s rights are infringed, the data subject may initiate legal proceedings, and pursuant to Paragraph (1), Section 52 of the Privacy Act, data subject is entitled to request an investigation at the Hungarian National Authority for Data Protection and Freedom of Information with reference to the infringement of rights pertaining to the processing of personal data, or its immediate danger. The litigation shall be assessed within the jurisdiction of the court. The legal procedure may be launched at the court competent in the place of residence or location of the data subject, according to his/her choice of court.

Contact information

If you have a request or a question regarding our processing of your personal data or this Privacy Statement in general, please contact us sending an email to the following address: zsolt.huszar@asuraprojectsupport.com.

Data Protection Officer

Dr. Jaczó Dániel – Dr. Jaczó Dániel Ügyvédi Iroda

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