

Privacy Policy

Last updated: August 07, 2019

Definitions

- Data Subject (or User): any living individual who is using our Service
- Personal Data: any information relating to an identified or identifiable natural person
- Usage Data: any information about how our service is accessed and used
- Data Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated manner
- Data Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data
- Data Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
- Cookies: small pieces of data stored on your device (computer or mobile device) and tell us how and when pages and features in our Services are visited and by how many people.
- GDPR: General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information from individuals who live in the European Union (EU).

What is the purpose of this Privacy Policy?

This is the Privacy Policy for Mito Next (“us”, “we”, or “our”).

Your privacy is important to us. This Policy summarizes our treatment of personal data that we gather when you are accessing or using our Services and the choices you have associated with your data. Please read this Policy carefully to understand our views and practices regarding your personal and usage data. By using our Service, you agree to the collection and use of information in accordance with this policy.

When you use our Services a detailed Terms of Use document will be available specified for the exact service you have requested, which incorporates and complements this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a user account, to enable you to build chatbots and communicate with chatbots others have built, to contact you and allow other users to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

Who is the Data Controller of your personal data?

For the purpose of this Privacy Policy, we are a Data Controller of your personal data.

Company name: Mito Communications Zrt.

Registration number: 01-10-047585

Headquarters: Hungary, 1053 Budapest, Károlyi utca 9. 4th floor

Tax number: 24169781-2-41

Company name: Mito Europe Kft.

Registration number: 01-09-893067

Headquarters: Hungary, 1053 Budapest, Károlyi utca 9. 4th floor

Tax number: 14192151-2-41

Company name: Mito Social Kft.

Registration number: 01-09-956155

Headquarters: Hungary, 1053 Budapest, Károlyi utca 9. 4th floor

Tax number: 23167511-2-41

In some cases - based on the specified services - other Data Controllers can appear beside Mito. Data controllers are considered to be independent, they define the purpose and the manner of data management independently, and they have an independent responsibility for data management. Data controllers have their own privacy statements.

What kind of personal data do we collect?

We collect several types of information on a lawful basis for various purposes.

Types of data collected:

1. Information you provide to us
2. Information collected automatically
3. Information collected from other websites

Information you provide to us

We receive and store any information you knowingly provide to us:

- if you create an account on our Services to build a chatbot, through the registration process and/or through your account settings, we may collect personal data such as, but not limited to, your name, address, email address, phone number, geographic region, timezone, list of Facebook Pages you own, password
- if you are an individual who communicates with chatbots that have been created using our services, we may collect information such as, but not limited to, your name, gender, address, email address, phone number, geographic region, timezone, username, avatar/picture.
- if you provide your Facebook or other third-party account credentials to, you understand some content and/or information in those accounts may be transmitted into your account with us, and that information transmitted to our services is covered by this Privacy Policy.

Information collected automatically

- We may also collect information on how our Service is accessed and used. This Usage Data may include information such as your computer's IP address, geolocation data, cookie information, your domain, browser type, browser version, operating system, mobile carrier, ISP, the pages or features of our Service that you visit or requested, the time and date of your visit, the time spent on those pages, the URLs of websites from which you arrive or leave our website, other unique identifiers, mobile or other device you use to access the website and any referring website and other diagnostic data.
- Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include any chatbots you have created using our Services, your conversation history with the chatbots, IP address, geolocation data, device identification, browser data, browser type (user agent, browser

version, etc), device type, device model, operating system version, screen resolution, information on your usage of our Website (list visited pages, etc) and online activities and information obtained with the use of cookies (see 'Cookies and other tracking technologies below').

Information collected from other websites

- Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services.

Please note that this Privacy Policy does not cover personal information you provide to our clients when using chatbots created with the use of our Services that are located on our clients' websites, as we do not control the means and purposes of such personal data processing as defined in Article 4(7) of the GDPR. Typically, our clients, who are owners of chatbots created through our Service will be able to collect your conversation history with the client's chatbot, and information contained in your public social media profile, such as your name, your avatar photo, your time zone, your gender, your language settings, and any other information you provide through the said chatbot. Our clients may also use third party product integration to receive and process personal information you have provided. Please consult our clients' privacy policies for such data processing activities.

On which legal basis do we collect your personal data?

Legal basis for collecting and using the personal information depends on the Personal Data we collect and the specific context in which we collect it. We may process your Personal Data because:

- You have given us permission to do so
- We need to perform a contract with you
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

The exact legal basis of collecting your data will be included in the Terms of Use document specified for the service you have requested.

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register or use our Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at adatvedelem@mito.hu.

Why do we collect your data?

We may use your Personal and Usage Data data (both on aggregated and on an individual basis) internally in connection with our Services, including

- to personalize, provide, and improve our services
- to customize your online experience
- to allow you to set up a user account
- to enable you to build chatbots and communicate with chatbots others have built
- to create user profiles
- to fulfill your requests for certain products and services
- to provide customer service and technical support
- to handle your inquiries or complaints
- to monitor the usage of our Service
- to detect, prevent and address technical issues
- to notify about changes to our Service

- to provide you with news, documentations, special offers and general information about other goods, services
- to contact you with newsletters, marketing or product updates and other information that may be of interest to you
- to contact you for marketing or other commercial purposes if you are an existing customer
- based on your historical use we may target you with advertisement or other marketing materials that are customized to your personal preferences and experiences.

Depending on how you have configured our Services, you may be able to use several functionalities provided by third parties. Certain of these functions need further information or personal data processed by us or the third party.

How long do we keep your data?

We will generally retain your personal data for as long as it is required for purposes for which the data were collected. If you wish to request that we no longer use your information to provide you services, please contact us. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies. We will retain Usage Data for internal analysis purposes in a de-intenified manner.

In general, information obtained in the course of providing our Service will be blocked from general access within a few days and deleted latest within 3 years after the end of us providing our Service, unless an earlier deletion is requested or has been agreed upon, or statutory retention requirements require a longer retention or we need to retain such data for own legitimate interests, for example, the defense against IT security threats. For example, national commercial or financial codes may require to retain certain information for up to 10 years.

How do we protect your data?

The security of your data is important to us. In general personal data will be handled in the following manner:

- Stored appropriately in light of the sensitivity and confidentiality of the information.
- Retrievable.
- Disposed of appropriately to prevent it from being accessed by unauthorized persons.
- Considered as confidential in nature.

To prevent unauthorized access, maintain data accuracy, and provide for the correct use of information, we have put in place physical, electronic and managerial procedures to safeguard and secure the information we collect online. Personal data you provide will be secured in accordance with industry standards and technology. Your personal data is contained behind secured networks and is only accessible by a limited number of people, who have special access rights and are required to keep the information confidential.

Our users are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of our Services. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

With whom do we share your personal information?

We will share your personal information with the following third parties:

- **Service providers and advisors:** Third party vendors and other service providers that perform services for us or on our behalf, which may include marketing campaign services, providing mailing or email services, tax and accounting services, product fulfillment, payment processing, data enhancement services, fraud prevention, web hosting, or providing analytics services; etc. These third parties include: Google Cloud, Microsoft Azure, Mailjet, Facebook, etc. Any such service providers will by appropriate data processing agreements be bound to only process the data on our behalf and under our instructions.
- **Law enforcement, regulators and other parties for legal reasons:** Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property, or personal safety of Mito, our visitors, or others

External Links

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site for which this Privacy Policy does not apply. The sites you can link to have their own separate privacy policy and although we seek to protect the integrity of our website, we cannot be held liable for the content and activities of these external sites. Your visit/access to these sites is therefore entirely at your own risk. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Cookies and other tracking technologies

The Services use cookies, web beacons, file information and similar technologies to distinguish you from other users of the Services. This helps us to provide you with a good experience when you browse the Services and also allows us to improve the Services.

Cookies are pieces of code that allow for personalization of the Services experience by saving your information such as user ID and other preferences. A cookie is a small data file that we transfer to your device's hard disk (such as your computer or smartphone) for record-keeping purposes.

We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our Services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our Website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Services.

We use the following types of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the essential operation of the Services such as to authenticate users and prevent fraudulent use.
- **Analytical/performance cookies.** These allow us to recognize and count the number of visitors and to see how visitors move around the Services when they are using it. This helps us to improve the way the Services work, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognize you when you return to the Services. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our Website, the pages you have visited, the links you have followed and may also gather information about your online activity after you leave our Website. We will use this information to make our Website, the advertising displayed on it, and the marketing messages we send to you more relevant to your interests. We may also share this information with third parties who provide a service to us for this purpose.

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities. You do not have to provide us your personal data and we will not automatically collect information if you reject or switch off these functions. However, we may not be able to provide the services you request from us without your personal and/or usage data.

What rights do you have?

We will take steps in accordance with applicable legislation to keep your personal data accurate, complete and up-to-date. You are entitled to have any inadequate, incomplete or incorrect personal data corrected (that is, rectified). You also have the right to request access to your personal data as well as additional information about the processing and to request us to erase the personal data we hold about you. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

The following rights apply in addition to the above:

- **Right to restriction:** you have the right to obtain restriction of processing, for example in case we no longer need your personal data in view of the initial purposes but they are required by you for the establishment, exercise of defence of legal claims.
- **Right to object:** you have the right to object to our processing of your personal data which is based on our legitimate interests. We will no longer process your personal data upon your request, unless we have compelling legitimate grounds for the continuation of the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. You may also object against our use of your data for direct marketing purposes. To that end, you may also use the unsubscribe button provided for in every email we send.
- **Right to withdraw consent:** in cases where we rely on your consent for using your personal data, you can withdraw such consent either partially or in its entirety at any time by sending an email to adatvedelem@mito.hu
- **Right to data portability:** under circumstances, you have the right to have your personal data transmitted to another data controller in a structured, commonly used and machine-readable format.
- **Right to lodge a complaint:** in case you have a question or complaint about how we process your personal data, you can send an email to adatvedelem@mito.hu. Alternatively, you can lodge a complaint with your local supervisory data protection authority.

You can always opt not to disclose information to us, but keep in mind some information may be

needed to register with us, to communicate with chatbots, or to take advantage of some of our features. You may stop using the Services at any time; however, your conversation logs from communications with chatbots may remain in our records.

In case of violation of data management rules, you are entitled to object to unlawful data handling and to request the National Data Protection Authority (postal address: 1537 Budapest, Pf. 834; address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c; e-mail: ugyfelszolgalat@naih.hu; phone: +36 (1) 391-1400; website: <http://www.naih.hu>), or Infotv for illegal data management. You may apply to court in accordance with the provisions of Section 22 of the Constitution. If you wish to go to court, you can also bring the case before the General Court of your domicile or place of residence.

When do we change this Privacy Policy?

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well. We will notify you of any changes by posting the new Privacy Policy on mito.hu and will let you know via email and/or a prominent notice on our Service. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective based on the last updated date at the top of this Privacy Policy. If you use the Services after any changes to the Privacy Policy has been posted, that means you agree to all of the changes.

How to contact us?

If you have questions or concerns regarding this Privacy Policy, or would like to make a complaint about a possible breach of applicable privacy laws or the handling of your personal data in general, please contact our Data Protection Officer directly by sending an e-mail to adatvedelem@mito.hu.