

DATA MANAGEMENT POLICY

About personal data management in Fishinda application

Applicable from May 25, 2018 until revocation

Your personal information is used to ensure you the usage of the services provided by Fishinda, and also to provide you useful content, relevant information, recommended products, services, and personalized offers in order to optimize your service experience. All these great services are based on your previous behavior, on the services you used and the information you shared with us.

The purpose of this prospectus is to provide information about the privacy and data management principles and rules applied in the Fishinda application ("**Application**") and fishinda.com website ("**Website**"). The personal data of natural persons who are registered in the Application and who are using the Website ("**Users**") are handled by Fishinda Ltd.

The principle of personal data management in the context of the operation of the Application and the Website is to provide all users the protection of personal data throughout their handling and processing, in accordance with the applicable laws.

I. Data Managers and Data Processors

I.1. Data Manager:

Fishinda Ltd.

address: 11 Páfrány köz, Sukoró 8096, Hungary

company registration number: 07-09-027623

e-mail: info@fishinda.com

website: www.fishinda.com

representative: Attila Kovács, executive director

I.2. Data Processors

Data provided to third parties is only intended to enable Fishinda to fulfill its service obligation towards you. Your data is passed to media agencies and technical suppliers.

Your data will never be sold or exchanged for marketing purposes with a third party outside Fishinda.

Fishinda Ltd. may use data processors for technical operations related to data management. Data Processors do not make any stand-alone decisions, they are only entitled to act under the contract with the data managers and the instructions received from them.

Fishinda uses data processors to send newsletters and other electronic commercials. In all cases, a written service contract is concluded with the Data Processors and the data processed by them can be stored until the contract is terminated.

Data Processors:

Company name	Address	Activity
Attadev Digital Ltd.	#304, Level 3, 4-8 Szerdahelyi utca, Budapest, 1086, Hungary	Operation of the application, fulfilment of the service
Click2Digital Ltd.	headquarter: 125 Wood Street, London, EC2V 7AW, England	Facebook and Google site management
ActiveCampaign, LLC	Suite 500, 1 North Dearborn Street, Chicago, IL 60602, US	Newsletter delivery system

II. The scope of the personal data handled

II.1. Personal data handled by Fishinda Application and Website

Please note that the use of the services provided in the Application is subject to the condition that Fishinda Ltd. processes the following data and forwards it to its Data Processors. By using the Application and by providing the relevant personal data or information, you have acknowledged and explicitly accepted the valid version of the complete Data Management Policy.

Scope of managed data:

- 1) First name
- 2) Surname
- 3) E-mail address
- 4) Password
- 5) State and country
- 6) Fishing licence number
- 7) Facebook ID
- 8) Google identifier
- 9) Profile picture
- 10) Data management contributions
- 11) Date of data management contributions
- 12) User ID
- 13) Extra subscription data
- 14) User-uploaded data (catches, logins, images, events, comments, likes details)
- 15) Data recorded during the use of the Application (last login, date of registration, time spent using the the Application, type of device, operating system)
- 16) Data on participation of Users in promotions organized by the Application
- 17) Data on discount coupon redeemed by Users
- 18) Newsletter subscription status
- 19) Sessions (start date, end date)
- 20) Notification date, text
- 21) Forgotten password request date

For the above data, data management and data processing are required to perform a service requested by the User during its registration, and to take action on the request/interest of the User.

The information contained in paragraphs 1-6), 9), 12-13) is required for personal identification, provision is mandatory. The information contained in paragraphs 7-8) will be handled for linking Facebook and Google accounts to the Fishinda account. Linking accounts is a condition of using the Application. The information contained in paragraphs 10-11) records and handles data of data management contributions. The information contained in paragraphs 14 -17) is voluntarily uploaded by the user at his own discretion when using the Application. This information is entered and uploaded by the User's own decision. The information contained in paragraphs 18-21) is administrative data, which records whether the User has subscribed to the newsletter voluntarily and at his own discretion; and also records how long the User has been using the Application, what information the User has received and when the User has requested a new password.

II.2. Technical data

Technically recorded data during the operation of the system: the data of the User's login computer and telephone, which is generated during the use of the Service and recorded by Fishinda Ltd. as an automatic result of technical processes. These data will be automatically recorded at every login and logout, without the specific statement or action of the User. These data can not be linked to other personal user information, except in cases that are legally binding. Only Fishinda Ltd. can access these data.

External servers support independent measurements and audits (Google Analytics) of visitor and other webanalytic data of the Website and the Application. Google Analytics can provide detailed information on the management of the measured data. Contact: www.google.com/analytics

If you do not want Google Analytics to measure the above data in the described manner and purpose, then install the blocking plugin in your browser.

II.3. Newsletter and personalized newsletter data management

You can subscribe to a newsletter when registering to the Application and also on www.fishinda.com website. The User who subscribes to the newsletter will voluntary hand over the below specified personal data to Fishinda Ltd. for management:

- 1) Name
- 2) E-mail address
- 3) Behavioral habits associated with Application and Website usage
- 4) Information and behavior patterns associated with reading newsletters

Users can unsubscribe from newsletters or other marketing communications free of charge at any time, without limitation or justification, at the following contact: info@fishinda.com.

In addition, if Users receive an advertising message from Fishinda Ltd. by e-mail, Users will get reminded in the mail that they have the right to unsubscribe at any time, without limitation and reasoning.

II.4. Participation in prize games and data management for marketing inquiries

At registration and during the use of the Application or the Website, Users may grant their consent to participate in promotions and prize games. In order to conduct these, Users may grant their consent to manage their given data, and also to disclose their name and country in case of the Users' winnings.

At registration and during the use of the Application or the Website, Users may grant their consent to Fishinda Ltd. for sending direct business (direct-marketing) offers (including the sending of newsletters) to the user-defined contact details.

These consents are not mandatory.

II.5. Data management for other purposes

Mailings with the Customer Service of Fishinda Ltd. (User complaints, claims, requests, inquiries) belong here.

Fishinda Ltd. maintains a Customer Service, whereby mailings with the Customer Service are recorded in order to enable Fishinda Ltd. to credibly reconstruct events in a consumer dispute case.

III. Data Protection Officer (DPO)

In the absence of any mandatory cases stated in Article 37 of the Hungarian GDPR Regulation, no Data Protection Officer was appointed.

IV. Legal basis, purpose and method of data management

IV.1. Data management is based on the User's voluntary statement in reliance on appropriate information, that is available on the Fishinda application and on www.fishinda.com website. This statement includes the express consent of the User to utilize the personal information provided during the usage of the Application and the Website. The legal basis for data management is the voluntary GDPR contribution of the User, which takes place under the Hungarian Republic's CXII Act 2011, a.k.a. Info Act (section 5, paragraph 1, point A) on the freedom of information and the right to informational self-determination, and also takes place under the CVIII Act 2001 on some aspects of e-commerce services and information society services.

The User consent is given for each data management by using the Website, by registering in the Application, and by voluntarily providing the information in question.

IV.2. The purpose of data management is to ensure the provision of services available in the Application and the Website. Fishinda Ltd. treats the data provided by the User solely for performing the Service, enabling billing, contacting, or for sending newsletters and proving the conditions of any resulting contract in case the User subscribes to a newsletter or participates in a prize game.

IV.3. The data to be automatically recorded is intended to produce statistics, to develop the IT system, namely the legitimate interest of Fishinda Ltd., and to protect the rights of the User.

IV.4. Fishinda Ltd. does not use the provided personal information for purposes other than those set out in these points. Issuance of personal data to a third party or authorities - unless otherwise provided by law - is only possible with the express and prior consent of the User.

IV.5. Fishinda Ltd. does not check the provided personal information. The correctness of the given data is solely the responsibility of the person giving it. When submitting an e-mail address, Users take responsibility for solely using the Service themselves from the specified e-mail address solely themselves. Regarding this responsibility, any liability associated with any entry in a given e-mail address shall be borne exclusively by the User who has registered the e-mail address.

V. DURATION OF DATA MANAGEMENT

V.1. The management of the personal data provided during the registration in the Application begins with registration and terminates with deletion upon request. In case of non-compulsory data, data processing lasts from the date of the data entry until the data in question is cleared on request.

Deletion of the registration may take place by the User in the Application Settings, or by Fishinda Ltd. at the User's request.

V.2. Logged data is stored relatable to User in the system until the registration is terminated.

V.3. In case of cancellation of the registration or in case the User does not enter the Application for 5 years (becomes inactive) all personal data (name, e-mail address, country, google ID, Facebook ID, fishing license number, user ID, photos, events) is deleted. Fishinda Ltd. continues to handle data anonymously about catches and user behaviors in order to create statistics and maximize user experience.

V.4. The above provisions do not affect neither the fulfillment of the retention obligations defined by law (eg accounting regulations), nor the data management based on newsletter subscriptions on the Website or through other contributions.

V.5. In case of a newsletter, personal data is processed until the User becomes unsubscribed from the newsletter.

VI. USER RIGHTS AND LAW ENFORCEMENT OPTIONS

VI.1. Users may request information about their personal data handled by Fishinda Ltd. at any time, and these data may be modified in the Application Settings by the User or at User's request by Fishinda Ltd.

VI.2. Fishinda Ltd., upon request of the User, shall provide information about the User's data processed by Fishinda Ltd. and by the entrusted Data Processors; about the source, purpose, legal basis and duration of the processed data; about the name, address and activity connected to data management of the Data Processors; about the circumstances, effects and measures taken to remedy any data protection incident; and about the legal basis and addressee of data transfer in the case of personal data transfer of the User. Fishinda Ltd. will provide the requested information in a written form within 30 days of the submission of the request.

Fishinda Ltd. maintains a register in order to control measures relating to privacy incident, and for the information of the User. This register contains the personal data of the User; the scope and number of persons involved in the data protection incident; the date, circumstances, effects and measures taken to remedy the data protection incident; as well as any other data specified in the law that prescribes data management.

VI.3. Users can exercise their rights through the following contact details:

Mailing address: Fishinda Ltd., 8096 Hungary, Sukoró, Páfrány köz 11.

Customer Service: info@fishinda.com

VI.4. Users have the right to ask for the correction or deletion of incorrectly recorded data at any time. Some of their data may be corrected by the User in the Application, in other cases Fishinda Ltd. will amend or delete the data within 3 business days of receipt of the request. In the latter case, data will not be restorable again. The deletion does not apply to the data processing required under the law (eg accounting regulations), those data are retained by Fishinda Ltd. for the required period of time.

Correction and deletion shall be notified to Users and all those to whom the data was previously transmitted for data management. Notification may be omitted if it does not prejudice the legitimate interest of the User with regard to the purpose of data handling

If Fishinda Ltd. does not comply with the User's request for correction, blocking or deletion, it shall give a written notice of the factual and legal grounds for rejecting the request for correction, blocking or deletion within 30 days of the receipt of the request.

Users may object to the processing of their personal data. Fishinda Ltd. will examine the protest within the shortest possible time, but within a maximum of 15 days of the submission of the application, to make a decision on its merits and will inform the applicant User of the decision in writing.

VI.5. The User may turn to the Hungarian Republic's National Authority for Data Protection and Freedom of Information (22/c Szilágyi Erzsébet fasor, Budapest, 1125 Hungary, www.naih.hu) under the Information Act and the Civil Code (Act V of 2013), and may exercise its rights before the Court of Justice.

VI.6. If the User has provided third party information during the registration of the Service or caused any damage during the usage of the Application and the Website, Fishinda Ltd. is entitled to claim damages against the User. In these cases, Fishinda Ltd. provides its assistance to the determining authorities in order to establish the identity of the offender.

VII. Data security

In the light of the state of science and technology, cost of implementation and data security risk, Fishinda Ltd. and its Data Processors implement appropriate technical and organizational measures in order to guarantee an adequate level of data security to the degree of risk.

Fishinda Ltd. protects the managed data with risk-proportional actions, particularly against unauthorized access, alteration, forwarding, disclosure, deletion or destruction, also against accidental destruction and damage, and furthermore against becoming inaccessible due to changes in the technology used. In this context, Fishinda Ltd. and its Data Processors store

the data in a password-protected and/or encrypted database. Fishinda Ltd. and its Data Processors protect data in a risk-proportional protection with firewalls, antivirus programs, encryption mechanisms, content filtering and other technical and process solutions, while data protection incidents are continuously monitored.

VIII. Other provisions

Fishinda Ltd. does not check the personal information provided. All responsibility about the adequacy, reality and validity of the data provided solely lies with the person who has given it. The User assumes responsibility for the exclusive use of the provided e-mail address.

In particular, the provisions of Regulation 2016/679 ("the General Data Protection Regulation" or "GDPR") of the European Parliament and Council have been taken into account when creating the provisions of this Data Management Policy.

Fishinda Ltd. reserves the right to modify this Data Management Policy at any time with prior notice to Users in the Application and on www.fishinda.com. By continuing to use the Application and www.fishinda.com website, the User accepts the modified terms.

Budapest, Hungary, May 23, 2018