Privacy Policy (Privacy Statement)

We inform the User that the service so the data processing is not obligatory it is based on the User's approval. All the information about data processing can be found in this Privacy Policy.

Definitions used in this policy are originated from Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information:

‘blocking of data’ shall mean the marking of stored data with the aim of limiting their processing in future permanently or for a predetermined period;

‘controller’ shall mean the natural or legal person, or unincorporated body which alone or jointly with others determines the purposes of the processing of data, makes decisions regarding data processing (including the means) and implements such decisions itself or engages a data processor to execute them;

‘data processing’ shall mean the technical operations involved in data control, irrespective of the method and instruments employed for such operations and the venue where it takes place, provided that such technical operations are carried out on the data;

‘destruction of data’ shall mean the complete physical destruction of the medium containing data;

‘disclosure by transmission’ shall mean making data available to a specific third party;

‘erasure of data’ shall mean the destruction or elimination of data sufficient to make them irretrievable;

‘personal data’ shall mean any information relating to the data subject, in particular by reference to his name, an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity, and any reference drawn from such information pertaining to the data subject;

‘processing of data’ shall mean any operation or set of operations that is performed upon data, whether or not by automatic means, such as in particular collection, recording, organization, storage, adaptation or alteration, use, retrieval, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction, and blocking them from further use, photographing, sound and video recording, and the recording of physical attributes for identification purposes (such as fingerprints and palm prints, DNA samples and retinal images);

‘public disclosure’ shall mean making data available to the general public;
‘referencing’ shall mean the marking of stored data for the purpose of identification;

‘special data’ shall mean:
   a) personal data revealing racial origin or nationality, political opinions and any affiliation with political parties, religious or philosophical beliefs or trade-union membership, and personal data concerning sex life,
   b) personal data concerning health, pathological addictions, or criminal record;

‘the data subject's consent’ means any freely and expressly given specific and informed indication of his wishes by which the data subject signifies his agreement to personal data relating to him being processed without limitation or with regard to specific operations;

‘the data subject's objection’ shall mean an indication of his wishes by which the data subject objects to the processing of his personal data and requests that the processing of data relating to him be terminated and/or the processed data be deleted;

‘third party’ shall mean any natural or legal person or unincorporated organization other than the data subject, the controller or the processor;

‘third country’ shall mean any State other than EEA Member States.

Introduction

If you have any questions or concerns about our privacy policy, contact our team by email info@smartlet.co.
By using or accessing Smartlet User agree to our privacy practices outlined here.

No information under age 18. Smartlet does not allow register under age 18. If we learn that we have someone under age 18, we will delete that registration. Fake profiles and misuse of personal data is forbidden!

If a User has information about other User who not meets the Smartlet’s General Terms and Conditions or its Privacy Policy please contact us through info@smartlet.co

I. Incoming information

We do not get information about Users only if they go through our registration process defined in General Terms and Conditions and agreed to be bound by the General Terms and Conditions and the Privacy Policy.

● Information from Users:

When Users go through the registration process they provide us with their name, email. During the registration process we give them the opportunity to provide additional profile information, such as:

as a tenant:

- gender, age (birth date), marital status, future rent city, square meter, rental fee, education level, which sector User is working in, job status, marital status, how long is User working in for his/her current employer, full time, part time, probation period over, employment contract
- type (permanent, temporary), how does User receive income, type of the income, how much is User's current rental fee, how much would User like to pay, what would be the
duration of User's next lease agreement, does User have a loan, its monthly payment, number of persons in User's household, monthly net income, does User own a property, is User renting it out, for how much, its duration, as a landlord:

gender, who owns the property, how many properties would User like to rent out, property address, minimum lease period, maximum lease period, caution money, monthly rental fee, after, before payment, rental fee is variable.

By using this site User consents to use and transfer personal data and User data in accordance therewith.

● Payment transactional information

Smartlet does not receive any information or data relating to payment transactions during paying the fee for the Service. So Smartlet does not get information or data about the User's bankcard, bankaccount so Smartlet is not able to store them.

● Information during interaction with Smartlet

Smartlet keeps track of the actions User takes on Smartlet, such as adding a tenant/landlord.

When User access Smartlet from a computer, mobile phone or other device, Smartlet may collect information from that device about browser type, location, and IP address, as well as the pages User visits.

II. Cookie Information.

Cookie is small pieces of data we store on User's computer, mobile phone, or other device) to make Smartlet easier to use and to protect both User and Smartlet. The information collected by cookies does not personally identify User; it includes general information about User's computer settings, connection to the Internet e.g. operating system and platform, IP address, browsing patterns and timings of browsing on the Website and location.

Smartlet can store session cookies on the website on User's computer during the interaction with the Service for the purpose of identifying the User and using safe time. The data will be deleted automatically immediately after using the Service or reaching the safe time. If the User allowed cookies in his/her browser, sites used by Smartlet automatically store the necessary cookies on the User's device till their deletion or maturity. Smartlet does not store any cookies about the User in its systems.

For the purpose of the Service quality improvement Smartlet can entrust third party to collect, store and process statistical data without identifying users.

III. Information from other Users:

Smartlet may collect information about Users from other Smartlet users, such as when a landlord/tenant send a photo of the User or provides details, or simply indicates a relationship with the User. By using the website User consents to collect information about him/her from
other
Smartlet users and acknowledges that other users may receive information of him/her.

IV. Information shared with third parties

Smartlet does its best to ensure that others use information in a manner consistent with its privacy rules. Smartlet cannot guarantee that users will follow the rules.

Privacy settings is designed to enable Users to control how they share their information on Smartlet. Users should review the default privacy settings to make sure they reflect their preferences.

- Users are able to control the visibility of the information they share on Smartlet in the privacy settings.
- Users’ name, profile photo, received reviews and rating are publicly available therefore it can not be hidden in privacy settings. These information will be deleted only when the User close the account.

V. Exporting Information.

Users may use tools copy and paste functions to store and export information from Smartlet, including their information and information about them.

VI. Links to external sites

User can click on links on Smartlet and leave the site. Smartlet is not responsible for the privacy practices of other sites. User is responsible for reading their privacy statements.

VII. Usage of information from Users

Smartlet uses these information to take steps to provide a safer, more efficient and likeable service. The collected information is also used to provide the more customized service and functions to Users, to measure and improve service and customer support. Furthermore Smartlet uses the information to prevent potentially illegal activities, and to enforce its rights and responsibilities. For example, asks for the date of birth to verify that User is over age 18. Smartlet uses technology and several systems to detect and address abnormal activities and contents and to prevent them. These activities and contents may lead to temporary or permanent suspension of Users.

VIII. Information and connection

Smartlet may contact the User with service-related information. Users are able to decide to opt out of all communications except essential updates on their accounts. Smartlet can use contents in those communications which can be seen on the website.

IX. Accounts without owners

In case of Smartlet learned that a User is deceased Smartlet may block the User’s account. In such cases Smartlet let profile access only to confirmed parties. Account can only be close in
case of receiving a formal request from the User’s next of kin or other proper legal request to do so.

X. Sharing data and information

Smartlet provides privacy for Users to restrict other users from accessing information. Smartlet only share information with third parties when believes the sharing is permitted by User, reasonably necessary to offer the Services, or when legally required to do so.

Smartlet does not let search engines access to information.

To improve the Service Smartlet may share aggregated information with third parties but only in such a way that no individual User can be identified or linked to any specific action or information.

Smartlet may ask advertisers outside of Smartlet to display ads promoting its services but in doing so Smartlet will not share any other information with the advertiser.

Smartlet may disclose information in case of subpoenas, court orders, or other requests if the response is required by law. Smartlet also share information when it is necessary to prevent fraud or other illegal activity, to protect the Users and itself.

In case of sale or change of controls of Smartlet, may transfer information to the new owner so that the service can continue to operate.

XI. Profile, personal information change, removal, block

Users are able to change or delete profile information at any time by going to profile page if the do so information will be deleted immediately. Account will be terminated if Smartlet has learned that the processing of data is illegal or by the orders of court or other legal party.

Blocking is also available. Smartlet blocks personal information if User requests or Smartlet believes the termination may hurt the Users’ rights. These data will be processed only till the processing purpose which excluded the termination is over.

In case of Smartlet does not execute the request for change, blocking and termination Smartlet informs the User about the reasons in written in 30 days after the request. In case of this Smartlet informs the Users about their legal remedy.

When User deletes the account only his/her evaluations will be stored for 2 years for business, improvement reasons. User’s file will be signed as „Cancelled User“ and reviews about him/her can be seen only by the person who has given the reviews earlier. Even after Users remove information from their profile or delete the account, copies of that information shared with others may remain viewable elsewhere. Users’ name will no longer be associated with that information on Smartlet.

XII. Data and information protection

Smartlet has made arrangements for and carry out data processing operations in a way so as to ensure full respect for the right to privacy of Users. Smartlet implements adequate safeguards and appropriate technical and organizational measures to protect personal data, as well as
adequate procedural rules to enforce the provisions of regulations concerning confidentiality and security of data processing.

Data and information is stored on safe and firewall protected servers, which are protected by means of suitable measures against unauthorized access, alteration, transmission, public disclosure, deletion or destruction, as well as damage and accidental loss, and to ensure that stored data cannot be corrupted and rendered inaccessible due to any changes in or modification of the applied technique.

For the protection of data sets stored in different electronic filing systems, Smartlet introduces suitable technical solutions to prevent - unless this is permitted by law - the interconnection of data stored in these filing systems and the identification of the Users.

Smartlet in respect of automated personal data processing:

a) prevents the unauthorized input of data;
b) prevents the use of automated data-processing systems by unauthorized persons using data communication equipment;
c) ensures that it is possible to verify and establish to which bodies personal data have been or may be transmitted or made available using data communication equipment;
d) ensures that it is possible to verify and establish which personal data have been input into automated data-processing systems and when and by whom the data were input;
e) ensures that installed systems may, in case of interruption, be restored; and
f) ensures that faults emerging in automated data-processing systems is reported.

In determining the measures to ensure security of processing, Smartlet takes into account the latest technical development and the state of the art of their implementation. Where alternate data processing solutions are available, the one selected shall ensure the highest level of protection of personal data, except if this would entail unreasonable hardship for Smartlet.

Automatically and manually analyzes potential fraud, illegal activities and unacceptable behaviors and contents.

PLEASE TAKE INTO CONSIDERATION THE RISKS OF SHARING INFORMATION. BE AWARE THAT DESPITE ALL THE DATA AND INFORMATION PROTECTION STEPS THERE ARE NO SECURITY MEASURES ARE PERFECT OR IMPENETRABLE. WE CANNOT CONTROL THE ACTIONS OF USERS WITH WHOM INFORMATION IS SHARED. WE CANNOT GUARANTEE THAT INFORMATION SHARED ON SMARTLET WILL NOT BECOME PUBLICLY AVAILABLE. WE ARE NOT RESPONSIBLE FOR THIRD PARTY CIRCUMVENTION OF ANY PRIVACY SETTINGS OR SECURITY MEASURES ON SMARTLET.

Users can reduce these risks by choosing a strong password and using different passwords for different services, and using up to date antivirus software.

If any security violations noticed please report to us on info@smartlet.co

XIII. Rights of Users; enforcement

Users may request:
a) information when his/her personal data is being processed,
b) the rectification of his/her personal data, and
c) the erasure or blocking of his/her personal data, save where processing is rendered mandatory.

Upon the Users’ request Smartlet provide information concerning the data relating to them, the sources from where they were obtained, the purpose, grounds and duration of processing, the name and address of the data processor and on its activities relating to data processing. Smartlet complies with requests for information without any delay, and provide the information requested in an intelligible form, in writing at the User’s request, within not more than thirty days.

Smartlet may refuse to provide information to User in the cases defined under Subsection (1) of Section 9 and under Section 19.

Where information is refused, Smartlet informs the User in writing as to the provision of Act CXII of 2011 serving grounds for refusal. Where information is refused, Smartlet informs the User of the possibilities for seeking judicial remedy or lodging a complaint with the Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information) (hereinafter referred to as “Authority”). Smartlet notifies the Authority of refused requests once a year, by 31 January of the following year.

Where a personal data is deemed inaccurate, and the correct personal data is at Smartlet’s disposal, Smartlet rectifies the personal data.

XIV. Other Terms

Smartlet may change this Privacy Policy anytime.

XV. Judicial remedy

In the event of any infringement of Users’ rights, they may file for court action.

30\textsuperscript{th} April, 2015