

# Privacy notice

On the collection and processing of personal data  
by Corvus Labs Ltd.



Data controller: Corvus Labs Ltd.

<https://corvusgps.com>

Valid from 2018/03/12

Version: v1.0

The following code is in effect until further notice  
the scope covers the managers, employees and data protection officer of the organisation.

# Chapter 1:

## General guidelines for non-specific data processing

### 1.1 – Purpose of the privacy notice

The Corvus Labs Ltd. (Hungary 7627 Pécs, Pósa Lajos utca 14.) (hereinafter service provider, data controller) as data controller undertakes itself to be bound by the content of the present legal statement. The data controller guarantees that all data processing emerging in the business activity of the data controller meets the requirements determined in the present privacy notice and the applicable international legislations, and acts of the European Union.

The data protection guidelines concerning the data protection of the Corvus Labs Ltd. are constantly available on the <https://corvusgps.com/support/legal-documents> website.

The Corvus Labs Ltd. reserves the right to alter the present notice at any time. The data controller notifies the public of the emerging changes in time on the above mentioned website.

The Corvus Labs Ltd. is engaged to the data protection of the partners and clients of the data controller, stresses the importance of respecting the right to informational self-determination of the clients. The Corvus Labs Ltd. treats all personal data as confidential, and takes all necessary security and organizational measures for the protection of the data.

### 1.3 – General information concerning data processing

The person designated as „data controller” in the chapter concerning purpose of data processing (*means 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; also processes personal data or makes the processor do the processing*) (hereinafter: **data controller**) controls personal data only for prescribed purposes, for granting the rights or complying with the obligations of the data controller. The data controller guarantees that the purpose of the data processing is met at each stage of the data processing.

The data controller controls the data to the extent and for the period required for the purpose of the data processing.

The personal data are registered (as data processing), reported to the Data Protection Register separately on the basis of the different purposes of the data processing. The information is also given separately on the basis of the different purposes of the data processing in the Chapter „purpose of data processing” of the present Privacy notice.

When processing data, the data controller guarantees the precision, entirety and timeliness (if it is required on the basis of the purpose of the data processing) of the data, and also ensures that the natural person is only identifiable for the time required for the data processing.

### 1.4 – General information concerning data processors

The data controller uses data processors for the data processing operations (like the storage of information on the server of a hosting service provider). The rights and obligations of the data processors concerning the data processing are defined by the data controller. The data processor does not make any substantive decision concerning the data processing, processes the personal data under the terms of the data controller, does not make any data processing for its own purposes, also stores and keeps the personal data under the terms of the data controller. The arrangement between the data controller and data processor concerning the data processing is recorded in writing. The data controller does not use any organisation, which has business interest in the usage of personal data to be processed. The data controller is responsible for the legality of the instructions given by the data controller. The details on the data and activity of the data processors are specified in the Chapter 'purpose of data processing'.

## Chapter 2: Identity of data controller

### 2.1 – Identity of data controller

Name:	Corvus Labs Ltd.
Business address:	7627 Pécs, Pósa Lajos u. 14., Hungary
Contact address:	7627 Pécs, Pósa Lajos u. 14., Hungary
Registration number:	02-09-083334
Registering court:	Pécs Városi Bíróság
Tax number:	26159094-2-02

### 2.2 – Data Protection Officer (DPO) contact details

In case you have any questions to our Company, you may contact us using the following contact details. Our Data Protection Officer is at your disposal.

Name of DPO:	Sárdi Zoltán
Contact address:	7627 Pécs, Pósa Lajos u. 14., Hungary
E-mail address:	<a href="mailto:zoltan.sardi@corvusgps.com">zoltan.sardi@corvusgps.com</a>
Phone number:	+36209540578

# Chapter 3:

## Scope of the processed personal data

### Purposes of data processing:

#### Account setup

We process data necessary for the functioning of the system and/or other optional data provided during the registration process (e.g. name and/or business name, e-mail address, password, profile picture). We ask the user only for data absolutely essential during the registration process.

#### Billing

We process data necessary for issuing the invoice after the purchase. We ask the user for data, and store them for the period prescribed by the law. (billing name, address, e-mail address, tax number)

#### Bookkeeping

We provide the data necessary for the book-keeping to the external bookkeeping firm responsible for our bookkeeper (Gyurics Consulting Ltd.).

#### Shipment

In case of purchase of physical products we ask the user for data necessary for the shipment.

### Types of messages/notifications:

#### Technical messages:

Short description: Technical messages required for the operation of the system.  
Recipients: All users receive them, it is not possible to unsubscribe.  
Channel of transfer: Email, Push message, Web

#### Newsletter/message

Short description: Developments, news, article recommendations, tips, etc..  
Recipients: Subscribed users receive them. Unsubscription possible in the account settings or at the bottom of the e-mail.  
Channel of transfer: Email, Push message, Web

#### Marketing

Short description: Sales, discounts, purchase incentive content, etc..  
Recipients: Subscribed users receive them. Unsubscription possible in the account settings or at the bottom of the e-mail.  
Channel of transfer: Email, Push message, Web

### The following information concerning the personal data processing are included in the Annex 1:

- Purpose of data processing
- Description of the purpose of data processing
- Legal basis of the data processing
- Scope of the processed personal data
- Duration of data processing
- Source of data
- Scope of authorized persons to be apprised of the data
- Transmission/sharing of data

## **Chapter 4:**

# **Specific data processing of the data controller**

Currently there is no specific data processing at the Corvus Labs Ltd.

## Chapter 5: Transmission of data

### Book-keeping

Data importer /third party/:	Gyurics Consulting Kft.
Type and specification of transmitted data:	Data prescribed by the law.
Address of the data importer:	7630 Pécs, Kocsz utca 13.
Legal basis of the transmission of data:	Law provision

# Chapter 6:

## Cookies

### 6.1 – Aim of cookies

- Collect information on the visitors and their devices;
- To remember the customizations of the visitors;
- Facilitate the usage of the website;
- Provide enriched user-experience;

In favour of tailored services the service provider sends a small data package (cookie) to the users computer, which will be submitted back on subsequent visits. If the browser returns a saved cookie, the service provider is be able to connect the actual visit of the user to the previous visits, but only in respect of its own content.

### 6.2 – Essential, session cookies

The aim of these cookies is to help the visitors to be able to browse the website of the Corvus Labs Ltd. fully and smoothly, use the functions and the available services of the website by allowing persistence between individual page loads. The validity of these cookies are normally set to 30 days from their last use, these cookies are automatically deleted from the computer (or other devices) after they expired.

### 6.3 – Third-party cookies (analytics)

On the website, Corvus Labs Ltd. uses the cookies of a third party called Google Analytics. Using the Google Analytics for statistical purposes Corvus Labs Ltd. collects information on the visitor's usage of the website. The data is used to develop the website and to enrich the user-experience. These kind of cookies will stay on the user's computer or other device used for browsing until they expire, or until the user deletes them.

# Chapter 7:

## Subject's rights

### 7.1 – Right to information

The Corvus Labs Ltd implements the necessary measures to give the subjects brief, transparent, clear, easily accessible, explicit and comprehensible information on the personal data processing according to Article 13, 14, 15-22 and 34 of the GDPR.

The Conditions of usage of Corvus Labs Ltd. are available on the following link:

<https://corvusgps.com/terms-and-conditions/>

The privacy notice of Corvus Labs Ltd. is available on the following link:

<https://corvusgps.com/privacy-policy/>

### 7.2 – The subject's right to access

On the request of the subject (who is identified or can be identified on the basis of any personal data) (hereinafter: subject) the data controller informs the subject on the source of the data; the purpose, legal basis and duration of data processing; the name, address and relating activities of the data processor; the terms, effects and preventive acts of a personal data breach; in case of data transmission the legal basis and recipient of data transmission; and the personal data itself, controlled by the data controller or on the data processed by the processor contracted with the data controller.

Besides the information gathering by submitting a request to the data controller, the subject is able to receive information on the processing of personal data from the data protection register. The data protection register is public for inspection, and for creating notes.

The data controller provides the information within one month of the date of the submission of the request.

### 7.3 – Right of rectification – right to request the rectification of personal data

At the request of the subject the data controller assesses the personal data referred in the application, whether it is effectively not accurate, and whether the accurate personal data is available. In this case the data controller corrects the personal data.

In case the subject contests the adequacy or accuracy of the personal data, but the inadequacy or inaccuracy is not established, the data controller tags the personal data.

### 7.4 – Right to be forgotten - right to request the erasure of personal data /except mandatory data processing/

At the request of the subject the data controller carries out the erasure or the blocking of the personal data. **During the erasure** of the data the data controller eliminates the data into an unrecognisable form to make them irretrievable.

The subject is entitled to obtain the erasure of the subject's personal data from the controller without undue delay on the following grounds:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- the data subject objects to the processing and there are not any overriding legitimate grounds for the processing;



- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

Beyond the request of the subject for data erasure, the data controller erases the personal data if the processing is unlawful;

- it is incomplete or inaccurate, and its is not be resolved legally, provided that the erasure is not precluded
- the purpose of the data processing no longer exists, or the period for storage prescribed by law is expired;
- it is ordered by the court or authority.

**The erasure of data is not requestable to the extent that processing is necessary:**

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defence of legal claims.

The data controller fulfills the erasure of the data without undue delay, within 30 days. The data controller notifies the subject and all others whom the data has been transmitted with the aim of processing, of the erasure of the data. The notification might be omitted in case with regard to the purpose of the data processing, and the omission does not prejudice the legitimate interests of the subject. In case the data controller does not fulfill the request for the rectification, erasure or blocking of the data of the subject, the data controller informs the subject on the factual and legal grounds of the denial in writing, or by electronic means with the consent of the subject within 30 days.

## **7.5 – Right to restriction of processing – right to request the restriction of processing of personal data with the exception of mandatory data processing**

**Instead of erasure** the data controller **blocks** the personal data at the request of the subject, or in case it is presumed on the basis of the given data that the erasure prejudices the legitimate interests of the subject. The thusly blocked personal data might be processed until the purpose of data processing which precludes the erasure of the personal data exists. **During the blocking** of the personal data the data controller tags the personal data with identification tagging for restriction of further processing permanently or for a predetermined period.

**The data controller restricts the data processing where one of the following terms applies:**

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs them for the accomplishment of its tasks but they have to be maintained for purposes of proof; or
- the data subject has objected to processing; in this case the restriction relates to the period until it has been determined whether the legitimate grounds of the data controller takes precedence over the legitimate grounds of the subject.

Where processing has been restricted, such personal data might, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

The data controller fulfills the blocking of the data without delay, within 30 days. The data controller notifies the subject and all others whom the data has been transmitted with the aim of processing, of the blocking of the data. The notification might be omitted in case with regard to the purpose of the data processing, the omission does not prejudice the legitimate interests of the subject. In case the data controller does not fulfill the request for the rectification, erasure or blocking of the data of the subject, the data controller informs the subject on the factual and legal grounds of the denial in writing, or by electronic means with the consent of the subject within 30 days.

## **7.6 – Right to data portability**

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

## **7.7 – Automated individual decision-making, including profiling**

The data subject has the right to request information from the data controller and to express his or her position on a decision based solely on automated processing.

In case of a decision based solely on automated processing the data controller informs the subject on the used methods, in particular the essence of the methods, also provides an opportunity to the subject to express his or her position on the matter.

The submission of the request to the data controller and the expression of the position of the subject is possible at the following contacts:

Via postal mail:

Name:	Corvus Labs Ltd.
Postal code:	7627
City:	Pécs
Address:	Pósa Lajos u. 14.
Email address:	<a href="mailto:zoltan.sardi@corvusgps.com">zoltan.sardi@corvusgps.com</a>

The information is provided for free in case the subject requesting information did not submit a request for information for the same set of data in the current year. In certain other cases costs might be determined. The measure of costs might be stated in the contract of the parties. In case of the unlawful processing of the data, or in case the request for information led to the rectification of data the paid costs are to be recovered.

The data controller informs the subject on the matter of the request or on the denial of the request as promptly as possible, maximum within 15 days.

## **7.8 – Right to object – right to object against the processing of personal data**

**The subject has the right to object against the processing of his or her personal data in the form of statement on the following grounds:**

- a) where the data controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims;
- b) where personal data are processed or transmitted for direct marketing purposes or profiling
- c) where personal data are processed for scientific research purposes.

**The statement of objection is a statement where the subject questions the processing of his or her data and asks for the termination of the data processing and for the erasure of the data.**

The data controller assesses the statement of objection as promptly as possible, maximum within 15 days, decides on the question of the merits of the objection and informs the subject on the decision in writing.

If the data controller established the merits of the objection of the subject, terminates the data processing – including the further data recording and transmission – blocks the data and informs all, whom the data controller previously transmitted the concerned data, and who are obligated to implicate the necessary measures for the enforcement of the right to object.

In case the data processing is mandatory by law, the data controller is not allowed to erase the subject's data. However the data controller is not allowed to transmit the data to the data importer if the data controller concurs to the objection, or the court established the legitimacy of the objection.

## **7.9 – Right of withdrawal**

The subject has the right to withdraw his or her consent anytime.

## Chapter 8: Enforcement methods of subject's rights

### 8.1 – File a complaint to the data controller in the first round

In case you, as subject presumes that the data controller infringes your personal right by the unlawful processing of your personal data or the violation of data security requirements, **the data controller recommends to file a complaint to the data controller in the first round.**

The data controller awaits your complaint on the following contact details:

Name:	Corvus Labs Ltd.
Contact address:	7627 Pécs, Pósa Lajos u. 14., Hungary
E-mail address:	zoltan.sardi@corvusgps.com
Phone number:	+36209540578

The data controller answers submitted complaints as promptly as possible, maximum within 15 days from the submission of the complaint.

### 8.2 – Turn to the Authority in the second place

In case you have already approached the data controller about your complaint concerning the processing of your personal data, but you did not receive an answer within the legally established deadline, or you do not agree with the received answer, you might turn to the National Authority for Data Protection and Freedom of Information (NAIH).

*Contact details of NAIH:*

Name:	<b>National Authority for Data Protection and Freedom of Information</b>
Business address:	1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Contact address:	1530 Budapest, Pf.: 5.
Phone:	+3613911400
Fax:	+3613911410

### 8.3 – Turn to the Court as the last resort

The subject might turn to the Court against the data receiver and the data controller on the following grounds:

- In case of the infringement of the subject's rights
- In case the subject does not agree with the decision of the data controller concerning the statement of objection,
- In case the data controller misses the deadline, does not answer within 15 days from the submission of the request (30 days from the last day of the deadline, or from the notification of the decision),
- In case the subject does not accept the factual and legal grounds of the denial of the request for rectification, erasure or blocking (25 days after receiving the request),

- In case the data controller refuses the request of the subject concerning the data processed by the data controller or the data processor working for the data controller; the source of the data; the purpose, legal basis and duration of the data processing; the name, address and and relating activities of the data processor; the terms, effects and preventive acts of a personal data breach; in case of data transmission the legal basis and recipient of data transmission, the subject might turn to the Court. During the lawsuit, the data controller is obligated to prove the compliance with the law. According to the choice of the subject, the lawsuit might also be brought in the courts of the place residence or stay of the subject.

# Chapter 9:

## Data protection

### 9.1 – Personal data breach

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to personal data transmitted, stored or otherwise processed.

A personal data breach may, if not addressed in an appropriate and timely manner, result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation.

The data controller should notify the personal data breach to the supervisory authority without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the data controller is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

The subject must be informed without undue delay in case that the personal data breach is likely to result in a risk to the rights and freedoms of natural persons, in order to let the subject take the necessary actions.

### 9.2 – General data protection rules

The data controller plans and carries out the data processing measures in a way that the data controller assures the protection of the privacy of the subject on the basis of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and other laws concerning data processing, thereby:

- The data controller and the data processor implements appropriate technical and organisational measures to ensure a enforcement the procedural rules of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and other laws concerning data protection.
- The data controller implements the necessary measures against unauthorized access, alteration, transmission, disclosure, erasure or destruction also accidental destruction and damage to the personal data transmitted, stored or otherwise processed.
- For the protection of the data files processed electronically in different records, the data controller implements the the appropriate technical measures to avoid the direct interconnection of data, and the allocation of the subject to the data.
- During the automated processing of the personal data the data controller and the data processor implements the following measures:
  - the prevention of unauthorized data entry;
  - the prevention of usage of the automated data processing systems by unauthorized persons using transmission devices;
  - the controllability and traceability of the transmission of personal data to different institutes using transmission device;
  - the controllability and traceability of the identity and time of the entry of data to automated data processing system;
  - the restorability of installed systems in case of system breakdown; and the reportability of errors emerging during the automated data processing.
- The data controller and data processor(s) are aware of the relevant technological developments during the implementation of the measures concerning data protection. They used the solution for data processing, that ensures the highest level of protection of personal data, except cases where it entails excessive difficulties for the data controller and data processor.

## **Chapter 10: Other provisions**

The subject will be informed during the data recording of all the data processing not mentioned in the present notice.

We inform our clients that the data controller might be reached by the court, prosecutor, investigating authority, administrative authority, National Authority for Data Protection and Freedom of Information and Hungarian Central bank for information, communication and transmission of data and to supply documents.

The Corvus Labs Ltd. disposes - in case the authority named the exact purpose and the scope of data - only the essential data to the authorities for the execution of the aim of the request.

# Chapter 11:

## Data protection know-how

### (Definitions)

- a. **GDPR** (General Data Protection Regulation) means the new regulation of the European Union
- b. **subject**: means an identifiable natural person who can be identified, directly or indirectly by reference of personal data;
- c. **personal data**: means any information relating to an identified or identifiable natural person, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- d. **consent**: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- e. **objection**: means the subject's statement objecting against the processing of his or her personal data, requesting the termination of data processing, the erasure of processed personal data;
- f. **data controller**: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means and also fulfils the processing of personal data;
- g. **data controlling**: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. 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) constitutes data processing as well;
- h. **data transmission**: means making data available to a specific third party;
- i. **erasure of data**: means the destruction or elimination of data sufficient to make them irretrievable;
- j. **data blocking**: means the marking of stored data with the aim of limiting their transmission, access, disclosure, alteration, destruction, erasure, connection in future permanently or for a predetermined period;
- k. **data processing**: means performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data ;
- l. **data processor**: means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- m. **third party**: means any natural or legal person or unincorporated organization other than the data subject, the controller or the processor;
- n. **personal data breach**: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- o. **data security**: means a set of organizational, technical solutions and procedural rules against the unauthorized handling of personal data, in particular the acquisition, processing, alteration and destruction of personal data; the state of data management in which the risk factors – and this the threat are reduced to the smallest organizations, technical solutions and measures;



**Annex 1 (Page 1) - User data processing**

Purpose of data processing	Scope of processed data	Legal basis of processing	Source of data	Duration of data processing	Method of data removal	
<b>Registration</b> Data required for creating an account.	Name	consent of the subject	from the data subject	as long as the account exists	removal of the account	
	Company name (optional)					
	Email address		recorded by the system			
	Country					
<b>Service (collected data)</b> Data required to operate the service.	Location (GPS coordinates, speed, etc...)	consent of the subject	recorded by the system	1. described in the contract or 2. as long as the account exists	1. automatically time by time or 2. removal of the account	
	User generated data (text, photo, etc...)		generated by the data subject			
<b>Operation of the system</b> Messages and emails related to operating the system. Eg.: password renew, account errors, legal notifications, etc... Channel: Email, Push message, Web	Name	consent of the subject	from the data subject	as long as the account exists	removal of the account	
	Company name (optional)					
	E-mail address					
<b>Newsletter / News message</b> News, articles, tips, etc... Channel: Email, Push message, Web	Name	consent of the subject	from the data subject	1. leiratkozásig vagy 2. as long as the account exists	unsubscribe	
	Company name (optional)					
	E-mail address					
<b>Marketing</b> Promotions, discounts, sales messages, etc... Channel: Email, Push message, Web	Name	consent of the subject	from the data subject	1. leiratkozásig vagy 2. as long as the account exists	unsubscribe	
	Company name (optional)					
	E-mail address					
<b>Billing</b> Data required to create an invoice.	Billing name	by law	from the data subject	as long as the account exists	removal of the account	
	Country					
	State					
	City					
	ZIP/Postal code					
	Street address					
	EU VAT number (optional)					
	E-mail					consent of the subject
	Comment (optional)					consent of the subject
<b>Shipping</b> For delivery of the product purchased from us.	Billing data	consent of the subject	from the data subject	as long as the account exists	removal of the account	
	Shipping data (address)					
	Phone number					

<b>Annex 1 (Page 2) - Visibility of user data</b>				
<b>Category of the stored data</b> (For the scope of processed data check page 1.)	<b>Corvus Labs' internal staff</b> Office, developers, support, primary subcontractors, etc...	<b>Corvus Labs' external staff</b> Accounting, marketing, partners and other subcontractors, etc...	<b>Users of an account</b> The administrator of an account and the users added / invited by him /her.	<b>3rd parties</b> People and organizations not members at the client's or Corvus Labs' team.
<b>Registration</b>	<b>Yes</b>	<b>No</b>	<b>Yes*</b>	<b>Yes*</b>
<b>Service (collected data)</b>	<b>Yes</b>	<b>No</b>	<b>Yes*</b>	<b>Yes*</b>
<b>Operation of the system</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Newsletter / News message</b>	<b>Yes</b>	<b>Yes**</b>	<b>No</b>	<b>No</b>
<b>Marketing</b>	<b>Yes</b>	<b>Yes**</b>	<b>No</b>	<b>No</b>
<b>Billing</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>
<b>Shipping</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>* The visibility of their own user's data is controlled by the account administrator or his / her authorized person(s). This data can be shared by the account administrator and its delegates with other people inside or outside of the organization. This data also can be shared publically by the administrator or it's delegates.</p>				
<p>** If we (Corvus Labs Ltd.) entrust 3rd parties to manage our marketing campaigns, we will provide data for them, which they can only use to manage our campaigns. Upon termination of the contract between the two parties, the data will no longer be stored and may not be used for any other purpose.</p>				
<p>*** In case of a formal request by an authority (eg. local police), we provide them information about our customers and their data stored by us.</p>				

**Annex 1 (Page 3) - Data processing of employees and partners**

Purpose of data processing	Scope of processed data	Legal basis of processing	Source of data	Duration of data processing	Method of data removal
<b>Recruitment</b> Recruitment of employees and subcontractors.	Name	consent of the data subject	from the data subject	until a deletion request	at the request of the data subject
	Company name				
	E-mail address				
	Phone number				
	CV				
<b>Employees and subcontractors</b> Administration of existing employees and subcontractors.	Name	consent of the data subject	from the data subject	until a deletion request	at the request of the data subject
	Company name (optional)				
	E-mail address				
	Phone number				
	Other legally binding data	by law	by law	by law	by law

**Annex 1 (Page 4) - Visibility of employee and partner data**

<b>Category of the stored data</b> (For the scope of processed data check page 1.)	<b>Corvus Labs' internal staff</b> Office, developers, support, primary subcontractors, etc...	<b>Corvus Labs' external staff</b> Accounting, marketing, partners and other subcontractors, etc...	<b>3rd parties</b> People and organizations not associated with Corvus Labs.
<b>Recruitment</b>	<b>Yes</b>	<b>No</b>	<b>No</b>
<b>Empoyees</b>	<b>Yes</b>	<b>No</b>	<b>No</b>