

PRIVACY POLICY

on the data processing of the Repmen App service (app.repmen.hu)

Effective from: 3 July 2026

This is a courtesy English translation of the Hungarian Privacy Policy (Adatkezelési Tájékoztató). In the event of any discrepancy, the Hungarian version shall prevail.

1. The Data Controller

Item	Details
Trade name	Repmen App
Name of the Data Controller	Visontai Barnabás Péter, sole trader (E.V.)
Registered seat	1038 Budapest, Gyöngyvirág utca 61.
Registration number	59340559
Tax number	90188013-1-41
Representative	Visontai Barnabás
E-mail	hello@repmen.hu
Phone	+36 20 989 9762
Website	app.repmen.hu

2. Purpose and legal background of this Policy

The purpose of this Policy is to inform data subjects in a transparent manner about the personal data processed in the course of using the Repmen App reputation management service. Within the framework of the service, the Data Controller — on the basis of the User's authorisation — also processes data and reviews obtained from the User's connected business accounts (Google Business Profile, Facebook Page). The data processing is based on the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (**GDPR**);
 - Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (**Info Act**);
 - Act XLVIII of 2008 on the Basic Conditions of Commercial Advertising Activity (**Advertising Act**) — with respect to marketing communications;
 - Act CXXVII of 2007 on Value Added Tax (**VAT Act**) and Act C of 2000 on Accounting (**Accounting Act**) — with respect to invoicing.
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3. Scope, purpose, legal basis and duration of the personal data processed

Data category	Purpose of processing	Legal basis	Retention period
Company name	Identification, contact, customer communication, performance of the contract	Performance of the contract – GDPR Art. 6(1)(b)	For the existence of the account (contract), until its deletion
Name of the company's representative	Customer communication, addressing, identification	Performance of the contract – GDPR Art. 6(1)(b)	For the existence of the account, until its deletion
Phone number	Customer communication, keeping contact; marketing outreach	Customer communication: performance of the contract – GDPR Art. 6(1)(b); marketing: consent of the data subject – GDPR Art. 6(1)(a)	Until deletion of the account; for marketing purposes, until withdrawal of consent
E-mail address	Customer communication, keeping contact; marketing (newsletter, offers)	Customer communication: performance of the contract – GDPR Art. 6(1)(b); marketing: consent of the data subject – GDPR Art. 6(1)(a)	Until deletion of the account; for marketing purposes, until withdrawal of consent
Password (app.repmen.hu)	Secure access to the user account, authentication	Performance of the contract – GDPR Art. 6(1)(b)	For the existence of the account; deleted upon deletion
Google Business Profile data (business profile name, ID, address/contact data, business information belonging to the profile)	Reputation management: managing the profile, displaying data	Performance of the contract – GDPR Art. 6(1)(b); the connection is established with the User's explicit authorisation	Until the account connection is terminated / the account is deleted
Facebook Page data (name and ID of the page, data belonging to the business profile)	Reputation management: managing the page, displaying data	Performance of the contract – GDPR Art. 6(1)(b); the connection is established with the User's explicit	Until the account connection is terminated / the account is deleted

Data category	Purpose of processing	Legal basis	Retention period
		authorisation	
Reviews and opinions (content of reviews received on the Google/Facebook profiles, the displayed name of their author, date, and the text of the review)	Reputation management: collecting, displaying and managing reviews, supporting responses	Legitimate interest of the Data Controller and the User – GDPR Art. 6(1)(f)	Until the connection is terminated / the account is deleted, or for as long as the legitimate interest exists
Invoicing data (name, address and tax number indicated on the invoice)	Issuing and retaining invoices, compliance with statutory obligations	Compliance with a legal obligation – GDPR Art. 6(1)(c) (VAT Act, Accounting Act)	8 years pursuant to Section 169 of the Accounting Act

Important technical note: The password is required for the lawful and secure operation of the service and for authenticating the account (not for marketing purposes). The Data Controller does not store the password in readable form; it is stored encrypted/hashed in line with industry practice.

On connecting social accounts (social login): the Data Controller accesses Google Business Profile and Facebook Page data exclusively on the basis of the User's explicit authorisation, within the scope of the permissions granted on the official interface of Google and Meta (Facebook), through their APIs. The User may terminate this connection at any time on the Repmen App interface or in their Google/Facebook account settings.

On the data of third parties (persons writing reviews): reviews may also contain personal data of persons who submit them and who are not in a contractual relationship with the Data Controller (e.g. customers) (e.g. displayed name, text of the opinion). Such data is typically already published on the public business profiles managed by the User. The legal basis for processing it is the legitimate interest of the Data Controller and the User (GDPR Art. 6(1)(f)); these data subjects have the right to object, and their data may be deleted upon request.

Providing the data required for concluding the contract (registration) is a precondition for the conclusion of the contract: without it, an account cannot be created, and without the connected profiles the service does not function as intended. Giving consent to marketing-purpose data processing is, however, voluntary and is not a precondition for registration or for using the service.

4. Purposes of the data processing in detail

- **Reputation management (provision of the service):** collecting, displaying and managing the reviews and profile data belonging to the connected Google Business Profile and Facebook Page accounts, and supporting responses to them.
 - **Customer communication:** establishing and maintaining contact, providing information about the service, handling customer-service matters.
 - **Marketing:** sending news, offers, newsletters and other advertising content related to the service by e-mail and/or phone — solely with the consent of the data subject.
 - **Invoicing:** issuing and retaining invoices in accordance with the applicable legislation.
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5. Consent (opt-in) and its withdrawal

5.1. The legal basis for processing the data required for providing the service is the performance of the contract (GDPR Art. 6(1)(b)). The legal basis for marketing-purpose data processing is the voluntary, explicit consent (opt-in) of the data subject, given during registration by ticking a separate, not pre-ticked checkbox.

5.2. The data subject may withdraw their marketing consent at any time, without giving reasons and free of charge, by a message sent to hello@repmen.hu, or via the unsubscribe link placed in the newsletter. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

5.3. Consent given for marketing-purpose data processing may be withdrawn independently of the other processing purposes; withdrawal does not affect the use of the service.

6. Data processors and recipients

To provide the service, the Data Controller uses the following data processor:

Data processor	Activity	Seat / contact
Rackhost Zrt.	Hosting, operation	6722 Szeged, Tisza Lajos körút 41.

Invoicing: the Data Controller issues invoices using the Online Invoicing (Online Számlázó) program of the Hungarian National Tax and Customs Administration (NAV), and the invoice data is transmitted to NAV on the basis of a statutory obligation. In this respect, NAV is not a data processor but a recipient receiving data pursuant to law (an independent controller).

7. Data transfer, third countries

7.1. The Data Controller does not transfer personal data to any third party, other than the data processor and recipient listed above and the authorities entitled to receive data based on a legal obligation.

7.1.a. **Google and Meta (Facebook) platforms.** On the basis of the User's authorisation, the service connects to the systems of Google (Google Business Profile) and Meta Platforms Inc. (Facebook Page) and reads data from them through their APIs. These platforms are responsible for their own data processing as independent controllers; their own privacy notices provide information about their data processing.

7.2. **Transfers to third countries.** In the course of using Google LLC and Meta Platforms, Inc., personal data may also be transferred outside the EEA, to the United States of America. An appropriate safeguard for such transfers is provided by the fact that both companies are certified participants in the EU–U.S. Data Privacy Framework, in respect of which the European Commission has adopted an adequacy decision (GDPR Art. 45); in the absence thereof, or in addition thereto, the standard contractual clauses adopted by the European Commission (SCCs, GDPR Art. 46) apply to the transfers.

8. Data security

The Data Controller ensures the protection of personal data through appropriate technical and organisational measures, in particular protection against unauthorised access, alteration, transfer, disclosure, deletion or destruction (e.g. encrypted data transmission, hashed storage of passwords, access restriction).

9. Rights of the data subject

Under the GDPR, the data subject has the following rights. A request to exercise these rights may be submitted to hello@repmen.hu, to which the Data Controller responds without undue delay, but no later than within 1 month.

- **Right of access:** information on whether the Data Controller processes their data and, if so, access to the data.
 - **Right to rectification:** correction of inaccurate data, completion of incomplete data.
 - **Right to erasure (“right to be forgotten”):** deletion of data where the statutory conditions are met.
 - **Right to restriction of processing.**
 - **Right to data portability:** receiving / transmitting the data in a structured, machine-readable format.
 - **Right to object:** in particular against processing for direct marketing purposes.
 - **Right to withdraw consent** (see Section 5).
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10. Legal remedies

10.1. The data subject may lodge a complaint with the supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa utca 9-11. Postal address: 1363 Budapest, Pf. 9. E-mail: ugyfelszolgalat@naih.hu Phone: +36 (1) 391-1400 Website: www.naih.hu

10.2. In the event of a violation of their rights, the data subject may also turn to the court. The lawsuit may — at the data subject's choice — be initiated before the regional court of their place of residence or place of stay.

11. Amendment of this Policy

The Data Controller reserves the right to amend this Policy. The version in force at any given time is available on the app.repmen.hu website. The Data Controller notifies data subjects of any material change by e-mail.

Drawn up in: Budapest, 3 July 2026

Visontai Barnabás Péter E.V. — Repmen App