

PRIVACY POLICY
OF
InSimu Limited Liability Company
2018

I. INTRODUCTION

The present privacy policy (hereinafter: "**Policy**") includes the rights and obligations and other essential provisions relating to the personal data given freely by the visitors – when subscribing for the *newsletter called InSimu – Reinventing Medical Education* – (hereinafter: "**Newsletter**") and processed and stored on the website www.insimu.com (hereinafter: "**Website**") operated by InSimu Limited Liability Company (registered seat: H-4032 Debrecen, Thomas Mann utca 19. I./5., Hungary, registration number 09-09-028171, tax number: 25747054-2-09; hereinafter: "**Company**"), furthermore relating to the personal data given freely during the registration and the use of the *InSimu Patient diagnostic tutorial application* (hereinafter: "**Application**") – being in the exclusive ownership of the Company – by the user of the Application (hereinafter: "**User**") and the personal data collected, processed and stored by the Company.

The processing and collecting of personal data uploaded to the Website and given during the registration and use of the Application shall be in harmony with the directly applicable laws of the European Union and the provisions of the Hungarian laws in effect. In case of personal data processing, *the Act CXII of 2011 on the Right to Informational Self-determination and Freedom of Information* (hereafter: "**Freedom of Information Act**"), *the Act XLVIII of 2008 on the essential conditions and certain limitations of business advertising activity* (hereinafter: "**Business Advertising Act**"), furthermore the recommendations and the data protection practice of the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: "**NAIH**") shall apply.

The data protection registration number relating to the Newsletter of the Company is: NAIH-103958/2016.

The Company will keep confidential the received personal data and takes all necessary steps to secure data processing.

II. DEFINITIONS

The following definitions are determined according to the Freedom of Information Act:

1. personal data: shall mean data relating to the data subject (hereinafter: "**User**"), in particular by reference to the name and identification number of the User or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity as well as conclusions drawn from the data in regard to the User
2. consent of the User: shall mean any freely and expressly given specific and informed indication of the will of the User by which he/she gives his/her consent to personal data relating to him/her being processed fully or to the extent of specific operations;
3. objection of the User: shall mean a declaration made by the User objecting to the processing of his/her personal data and requesting the termination of data processing, as well as the deletion of the data processed;
4. controller: shall mean natural or legal person, or organization without legal personality which alone or jointly with others determines the purpose and means of data processing; makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor;

data processing: shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronizing or connecting, blocking, deleting and destructing the data, as well as preventing its further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans).

As stated above, the Company is the data controller of any data which constitutes personal data and is uploaded and collected during the registration made on the Website and the registration to the Application and by the use of the Application.

III. PRINCIPLES OF DATA PROCESSING

During the data processing only such personal data may be processed by the Company which is indispensable for (i) sending Newsletter to the registered visitors of the Website, (ii) Users registered through the Application to reach the Application, (iii) the Company to improve and to customize the Application to the needs of the Users.

Personal data shall be processed if it is prescribed by law or if a consent is given by the User. Accordingly, by providing the data described in point IV. during the registration on the Website or through the Application, the User, registered via the Website or through the Application, gives its consent to (i) the processing and end-using of its personal data for purposes as described in point V. below; as well as to (ii) the storage of data provided by the Company under the conditions included in the present Policy; furthermore to (iii) the Company to send newsletter to the registered User – provided the User has specially requested it.

IV. END-USED AND COLLECTED DATA

1) Website

The Website is free to visit without providing any personal data. The Company does not collect or process data regarding the visitors. The Newsletter service available on the Website requires the registration on the Website, whereby the following personal data shall be given for the registration:

- Name
- E-mail address

2) Application

The Application can be freely downloaded from the App Store or the Google Play store. The Company collects data from the Users who download the Application (e.g. providing the student status is a condition to receive the second free study case to be solved), which data are not classified as personal data until the User registers through the Application. At the same time after solving the third free study case the User will be able to register through the Application, which registration is a condition to be able to solve further free study cases.

The following personal data shall be given for the registration:

- Name
- E-mail address

Registration can be done by logging in as a Facebook or Google user. When logging in as a Facebook or Google user, Facebook or Google will provide the Company with information that

the User has made available through Facebook's or Google's privacy settings. This information may include the User's name, profile picture, gender, list of friends, and any other public information that is made available by the decision of the User.

After the registration, to access more free and discounted content of the Application, the User can optionally fill out the detailed profile data whereby the following data will be given:

For students:

- country
- university
- name of the degree
- expected year of graduation

For medical doctors:

- country
- specialization
- university
- year of graduation
- current institution

For other medical specialists:

- country
- specialization
- university
- year of graduation
- current institution

For others:

- country
- profession
- how can the Application help the User

During the Registration, if the User is not logging in as a Facebook or Google user, the User has the option to upload a profile image (hereinafter referred to as "**Profile Image**"). By uploading the Profile Image, the User explicitly agrees and gives permission to the Company to process the Profile Image for the purposes set out in Section V 2) of this Policy until the termination of the contract between the User and the Company.

In order to improve and customize the Application the Company uses analyzing tools to analyze the Users' activity, as well as tools to record the Users' usage of the Application, which tools are intended to monitor and record the Users' activity in the Application. The above referred data collection is done anonymous until the registration of the User, after the registration the data collection is User related.

V. THE PURPOSE OF DATA PROCESSING

1) Website

Purpose of data processing: sending Newsletter to the Users registered through the Website, in order to explore interest about the Application developed by the Company.

Duration of data processing: starts by the registration, and ends by its erasure, as well as by the realization of the purpose of data processing, or until other date prescribed by law.

Legal basis of data processing: the consent of the User (subscribing to Newsletter), and section 6 of Business Advertising Act.

If the registered User has given consent to receive Newsletter from the Company to his/her email address, the User may freely withdraw his/her consent without any restriction and justification by email sent to the following address of the customer service: support@insimu.com or by a declaration addressed to the Company, sent by post to the registered seat of the Company.

2) Application

The data given obligatory during the registration through the Application is processed and collected by the Company for the purpose to ensure the right to access to the Application.

The detailed profile data optionally given during the usage of the Application as well as the data collected by the tools to analyze and monitor the use of the Application are required to develop, form a user-friendly environment and customize the user experience, whereby the User gets customized content during the usage of the Application, furthermore receives customized e-mails to his/her e-mail address given during the registration.

The duration of the data processing: starts by giving the detailed profile data or the use of the Application and ends by the erasure of the User's registration as well as by the realization of the purpose of the data processing or any other date prescribed by law.

After the erasure of User's registration the Company may process the data, gained from the analyzing and monitoring tools, deprived from its personal data nature anonymously, for statistical purpose and for developing the Application.

VI. DATA TRANSFER, DATA PROCESS

The Company shall not ensure access for a third party to personal data provided during the registration without the preliminary consent of the User, except the cases, when the Company's data transfer is prescribed by law.

The Company may request data process service for processing the personal data. During the service of data process, the data processor shall abide under the present Policy, relevant legislations in force, furthermore the provisions of the existing contracts of the Company.

The Company uses the data process service of the following company:

Name of the company: The Rocket Science Group, LLC

Address: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA

Activity: Newsletter service

There is no further data transfer relating to personal data processed by the Company.

VII. ANONYMOUS DATA AND COOKIES

The Company collects mainly anonymous data from the Website, such as searches. When the visitor visits the Website, the Company doesn't collect any data until authorization is given by the visitor to do it so. The Company processes anonymous data in order to improve the page, to bring it to perfection. During this procedure the Company can incorporate "cookies", which collect the visitor's first level domain name, the date and the exact time of access. The "cookie" alone can't be used to reveal the identity of the visitor. The "cookie" is a file, which is sent to the browser of the visitor and stored on the hard drive of visitor. Cookies doesn't damage the computer of the visitor. The browser can be set to indicate when a cookie is received, so the visitor can decide to accept the so called cookie or not.

VIII. RIGHT TO REMEDY

The registered User can ask for information about the processing of his personal data, he/she can also ask for its rectification, except data processing prescribed in the legislation, and for its deletion, by email sent to support@insimu.com or by a declaration addressed to the Company, sent by post to the registered seat of the Company.

For the request of the registered User the Company gives information about the data processed by itself or by the data processor on the behalf of the Company, as well as about the purpose of the data processing, its legal basis, its duration, the name, the address (the registered office) of the data processor and about its activity related to data processing, furthermore about those who received, or will receive the data, and about the reason why they received it. The company as a data controller, gives written information in a comprehensible manner within 30 days after the receipt of the request. The information is free from charge, if the applicant hasn't submitted any request for information to the Company regarding the same category during the current year. In any other case the Company can determine a reimbursement.

The Company immediately erases the personal data if (i) the registered User indicates it by an email sent to support@insimu.com email address, or by a declaration addressed to the Company which shall be sent by post to the registered seat of the company; (ii), the data is processed unlawfully (iii) the purpose of the data processing has ceased to exist; (iv) legal time limit for storage has expired; (v) so ordered by court or by the NAIH.

The Company notifies the registered User by email about the rectification or deletion, however the notification is not required if the data processing doesn't violate the rightful interest of the User, in light of its purpose.

The User has the right to object to the processing of data relating to him/her, if

- *the processing is carried out solely for the purpose of enforcing the legitimate interest of the data controller, unless the data processing is prescribed by the law;*
- *if the personal data is used for the purposes of direct marketing, public opinion polling or scientific research;*
- *the legislation otherwise allows the exercise of the right to objection*

The Company, with suspending simultaneously the data processing, examines the objection immediately or within 15 days at the latest, and informs the User in written form about the result. If the objection is justified the Company terminates the data processing.

If the User doesn't agree with the decision of the Company, he/she can turn to court or to the NAIH (registered seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C., Website: <http://www.naih.hu>), within thirty days from the date of delivery of the decision.

The Company shall not delete the data of the User if the data processing was prescribed by law. When infringing his/her rights the User shall turn to court. In this case the Court will act immediately.

The Company reserves the right to change the Policy, or to modify it according to the changes in the laws of the European Union law or the Hungarian law.

The present Policy shall enter into force on January 8, 2018

Please accept the present Policy only if you agree with the above.

If you have any further questions regarding data protection or our Policy, please write to our following address: support@insimu.com.