



## PRIVACY POLICY

The purpose of the Data Protection Information is to inform the persons (data subjects) providing the data about the applicable data protection rules, as well as about the data processing procedure of Mohini Flow Ltd, hereinafter: the Company, Data Controller.

Name of data controller: Mohini Flow Ltd.

Contact details of the data controller:

Email: [info@mohiniflow.com](mailto:info@mohiniflow.com)

Customer service contacts:

Email: [support@mohinico.in](mailto:support@mohinico.in)

*(It is recommended to contact the Company through Customer Service!)*

The main pieces of data protection legislation are:

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: Info law.),
- Act CXXXIII of 2005 on the Rules of Protection of Persons and Property and the Rules of Private Investigation "(hereinafter:: Pp law),
- Act V of 2013 on Civil Code,
- Directive 95/46 / EK of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data,  
Regulation 2016/679 of the European Parliament (EU) and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EK (General Data Protection Regulation (GDPR)) Hereinafter "the Regulation").

By publishing this Privacy Policy, the data controller complies with the recommendation of the National Authority for Data Protection and Freedom of Information (NAIH) regarding the data protection requirements of prior information.

The Data Controller processes personal data only to the extent and for the time necessary to achieve the purpose.

Consent to data management: the data subject (the person providing data to the Company as a data controller) expressly consents to the processing of his / her personal data voluntarily provided during registration or by using the Company's online and other services.

The persons involved in data management are: natural persons using the services of the website [www.mohinico.in](http://www.mohinico.in) (hereinafter: data subject or user).



Scope of data managed: the data provided by the users and data subjects on the website [www.mohinico.in](http://www.mohinico.in) during the registration or during the use of the other services of the Company, necessary for the successful registration (obtaining the Partner status) and for the fulfillment of the other services used by the user:

- surname and first name,
- username
- contact (phone, e-mail).

Collection of personal data: personal data are data that can directly or indirectly identify or contact the data subject.

Except as described in this Privacy Notice, the Data Controller will not disclose or transfer personal data to third parties.

Your personal information is requested if you visit [www.mohinico.in](http://www.mohinico.in) and you wish to register on this website, and you wish to obtain Partner status, when requesting information about our services, when subscribing to marketing communications (of course you can unsubscribe at any time), or initiating a transaction defined in the GTC (General terms and conditions), or applying for a corporate event. We may collect personal information about you offline, such as when you attend one of our events or when you contact our customer service. This information may be used if the Company wishes to contact you.

The purpose of data collection is to complete transactions, invoice, cooperation with authorities, prevent money laundering and terrorist financing.

Use of Personal Information: The primary purpose of collecting personal information is for the Company to provide a secure, seamless, efficient, and personalized service to Partners. Generally, the Company uses personal information for its services, maintenance, development and operation of content and advertisements.

The Company may use the information provided as follows:

- maintaining legal and regulatory compliance,
- provision of services,
- providing service communication,
- providing customer service,
- ensuring quality control,
- ensuring network and information security,
- development goals,
- Enhance your site experience
- continuing marketing activities.



Protection and storage of personal data: the Company applies appropriate physical, technical and administrative safeguards to protect the personal data provided by the data subject and to ensure your security and confidentiality. We may store and process all or part of your personal and transaction information. The Company protects the personal data of the data subject, in compliance with the relevant laws and regulations, by maintaining electronic and procedural guarantees. For example, we use computer fuses, firewalls, data encryption. The data is processed in electronic format only. We only allow access to personal data to those who need it to perform their duties. However, we cannot guarantee that the data will not be lost, misused, unauthorized obtained or altered. It is important to keep in mind that the data subject plays a vital role in protecting his/her own personal data. When registering, it is important that a username of sufficient length and complexity is selected so that this password is not displayed to third parties and that you notify the Company immediately if it detects unauthorized access to your account.

The Company cannot realistically guarantee the security or confidentiality of data sent or received by e-mail, telephone or SMS messages until the affected data is received by the Company. It is important that if you have reasonable grounds to believe that your information is no longer secure, please contact the Company by the email or mailing address provided in this Privacy Policy.

The data provided by the data subject will only be passed on to third parties if:

- the data subject has consented to
- necessary for the performance of the contract or in the legitimate interest of the Company, or
- the Company is bound by law.

Data Processor: the Company's Data Processors are the contracted partners who participate in the provision of services to the Company. These persons and organizations act on behalf of the Company, following the decisions of the Company, however, the Company is also responsible for data management in these cases. The data of the data subject may not be used independently if the contract of the Company with them is ceased, the data subject is obliged to delete and ensure the data. In all such cases, the Company shall ensure that the relevant data processor applies appropriate technical and organizational measures to maintain the security of the data. Such a control mechanism includes, but is not limited to, restrictions on access to the data and the infrastructure that stores it, as well as an agreement with them that obliges them to comply with the relevant legislation.



The Company's data processing partners:

**The Company's servers are operated by OVH Cloud.**

ovh.ie - <https://www.ovh.ie>  
Unit 12 The Courtyard Building,  
Carmanhall Road  
Sandyford  
Dublin 18

**Correspondence of the Company is handled through the Mailchimp correspondent**

The Rocket Science Group, LLC  
675 Ponce de Leon Ave NE  
Suite 5000  
Atlanta, GA 30308 USA

Legal assistance required for the enforcement of rights and the fulfillment of obligations: if the Company needs legal expertise and advice during the operation of [www.mohinico.in](http://www.mohinico.in), a legal expert will be used. Such a case could be, for example, a possible Partner complaint or a claim in a possible dispute. In order for the legal expert involved to be able to perform the affected task, it may be necessary to provide him or her with personal data. In the material case, however, the legal expert (lawyer) does not qualify as a data processor, given that he or she is entitled to dispose of the material data independently on the basis of the applicable legal and professional regulations.

Legal obligation: if the Company is obliged by law, the data concerned will be transferred to a third party.

Duration of data management: the Company retains the electronically stored personal data during the contractual relationship and, as a general rule, for 5 years from the date of its termination (general statute of repose). The accounting document (including the accounts, analytical and detailed records) directly and indirectly supporting the accounting records must be kept in a legible form for at least 8 years, in a retrievable manner based on the references of the accounting records.

The data subject may apply to the Company (data controller):

- access to, rectification, erasure or restriction of the processing of personal data concerning him,
- object to the processing of such personal data, and
- the data subject has the right to data portability and to withdraw his or her consent at any time.



In the case of the exercise of individual rights by the data subject, the data subject may initiate the exercise of the legal rights with the data controller by e-mail. The data controller shall provide the information in writing in a comprehensible form at the request of the user as soon as possible after the submission of the request, but no later than within 15 working days. If the Company finds the request of the data subject to be legitimate and well-founded, it shall take immediate action.

#### General definition of each license:

##### 1. Right of access

The data subject has the right to receive feedback from the controller as to whether the processing of his or her personal data is in progress and, if such processing is in progress, he or she has the right to access the personal data and information listed in the Regulation.

##### 2. Right to rectification

The data subject shall have the right to request the controller to rectify inaccurate personal data concerning the data subject without undue delay. Taking into account the purpose of the data processing, the data subject has the right to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary statement.

##### 3. Right of cancellation

The data subject shall have the right to request the controller to delete personal data concerning the data subject without undue delay, and the data controller is obliged to delete personal data concerning the data subject without undue delay under certain conditions.

##### 4. The right to be forgotten

If the controller has disclosed personal data and is required to delete it, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, in order to inform the controllers that the data subject has requested the data deletion (copy or duplicate as well) of the personal data in question.

##### 5. Right to restrict data processing

The data subject shall have the right to request the controller to restrict the data processing if one of the following conditions is met:



- the data subject disputes the accuracy of the personal data, in which case the restriction applies to the period of time that allows the controller to verify the accuracy of the personal data,
- the processing is unlawful and the data subject opposes the deletion of the data and instead requests that their use must be restricted,
- the data controller no longer needs the personal data for the purpose of data processing, but the data subject requests them in order to submit, enforce or protect legal claims,
- the data subject has objected to the data processing. In that case, the restriction shall apply for as long as it is established whether the legitimate reasons of the controller take precedence over the legitimate reasons of the data subject.

#### 6. Right to data portability

The data subject shall have the right to receive the personal data - concerning the data provided by the data subject to the controller - in a structured, widely used, machine-readable format and to transfer such data to another controller without being hindered by the controller to whom the data subject has provided personal data.

#### 7. Right to protest

The data subject has the right to object at any time for reasons related to his or her situation to the processing of his or her personal data, including profiling based on those provisions.

#### 8. Protest in case of direct acquisition

Where personal data are processed for the purpose of direct business acquisition, the data subject shall have the right to object at any time to the processing of the relevant personal data of the data subject for that purpose, including profiling, in so far as it relates to direct business acquisition. If the data subject objects to the processing of personal data for the purpose of direct business acquisition, the personal data may no longer be processed for this purpose.

#### 9. Automated decision making in individual cases, including profiling

The data subject has the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effects on the data subject or would affect the data subject to a similar degree. Not applicable if the decision:

- necessary for the conclusion or performance of a contract between the data subject and the controller,



- is governed by EU or member state law applicable to the controller, which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject, or
- is based on the express consent of the data subject.

COOKIES: The Company's website uses cookies in order to distinguish each Partner from other Partners (individuals) using the Site. This helps to make it a pleasant experience for the Partner to browse the website, while also allowing the Company to develop the website.

Security technology: the Company uses database encryption technology to protect the data and information provided by the parties involved. This technology serves to prevent data and information from being compromised when communicating with the Company.

Remedies: in case of an event resulting in an accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data stored, transmitted or otherwise handled (hereinafter referred to as the "Data Management Incident"), the Company, as Data Controller undertakes that without delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, notifies to the National Data Protection and Freedom of Information Authority (address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c .; phone: + 36-1-391- 1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)) as a competent supervisory authority. An exception to the notification obligation is if the data protection incident is not likely to pose a risk to the rights and freedoms of natural persons. Where the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons, the controller shall, without undue delay, inform the data subject of the data protection incident, which shall clearly and intelligibly indicate the nature of the data protection incident.

The data controller informs the data subject that in case of violation of his / her data protection rights, he / she may file a complaint with the NAIH or apply to a court by means of a claim. The person concerned may also bring legal proceedings before the court having jurisdiction over his or her place of residence or stay.

If the Data Controller causes damage to another person by unlawfully processing the data subject's data or violating the data security requirements, he / she is obliged to compensate him / her, and if this conduct violates the data subject's right to privacy, the data subject may claim damages. The Data Controller shall be released from liability for the damage caused and the obligation to pay damages if it proves that the damage or the violation of the personal rights of the data subject was caused by an unavoidable cause outside the scope of data processing.

With a request for legal remedy, the concerned data subject can turn to the National Data Protection and Freedom of Information Authority (address: Hungary 1125



Budapest, Szilágyi Erzsébet fasor 22 / c .; phone: + 36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)). In case of violation of the rights of the Data Subject, he / she is entitled to apply to a court for enforcement and legal remedy.

### Concept definitions

1. "personal data" shall mean any information relating to an identified or identifiable natural person ("data subject"); identifiable a natural person who, directly or indirectly, in particular on the basis of an identifier such as name, number, location, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;
2. "data processing" means any operation or set of operations on personal data or files, whether automated or non-automated, such as collection, recording, systematisation, sorting, storage, transformation or alteration, retrieval, consultation, use, communication, transmission or dissemination; by other means of access, coordination or interconnection, restriction, deletion or destruction;
3. "data controller" means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;
4. "data processor" means any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
5. "recipient" means a natural or legal person, public authority, agency or any other body to whom or with which personal data are communicated, whether a third party or not. Public authorities that may have access to personal data in the framework of an individual investigation in accordance with Union or Member State law shall not be considered as recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;
6. "data subject's consent" means the voluntary, specific and duly informed and unambiguous statement of the data subject's intention to indicate his or her consent, by means of a statement or an unequivocal statement of confirmation to the processing of personal data concerning him or her;



7. "data protection incident" means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data which have been transmitted, stored or otherwise handled.

Mohini Flow Ltd.  
Data controller