



NORTHFOTO PRIVACY POLICY

This Privacy Policy applies to information that Northfoto Bt. collects through the Northfoto.com website which make this Privacy Policy available (known as thereafter as the “Service”).

This Privacy Policy explains the types of information we may collect, how we may use and disclose the information once it is collected, and, where applicable, how you can stop us from collecting, using, disclosing or continuing to hold your information. We want to ensure that in using any of the Services, you understand the terms of this Privacy Policy, including any subsequent changes made to the Privacy Policy as described in Part 11 below, and are aware of the privacy choices available to you. Please note that this Privacy Policy does not apply to information that you may provide to us, or that we may obtain, where a separate privacy policy is made available to you or which do not make this Privacy Policy available.

1. What information may be collected?

User-Provided Information

During your use of a Service (whether as a registered or unregistered user), you may provide us with personal information, such as your name and e-mail address, or other information that could be used to identify you as an individual or allow someone to contact you, as well as any information associated with such information (collectively, “Personal Information”). Personal Information includes both things that specifically identify you (like your real name) and things that don’t specifically identify you, but might be connected back to you (like the IP address of your computer or the device identifier of your smartphone).

Location Data

When using our Services from a mobile device (a “Mobile Service”), you may share the geographic location of your device with us. Your device location may be transmitted to us whenever a Mobile Service is running (even if you are not actively using the Mobile Service or it is running in the background on your device). Your device may continue to transmit its location to us until you change your device settings.

If you set your device not to transmit location information to us, certain features of our Services may not be available or their functions may be limited. For example, you will have to manually enter a location when conducting a search. You should also know that turning off location sharing only prevents your device from sharing its precise location. Your

network service provider may still provide general location information (based on access points you've connected to, for example). The information provided varies by network service provider. You should check with your network service provider to find out what information is provided and if there are ways for you to limit it.

Service Usage Information

As is typical of many web sites and mobile applications, when you use our Services, we may collect information about your device and your usage of our Services including:

- Your IP address (which we may associate with your domain name or that of your Internet access provider or wireless carrier, and your location);
- Unique ID number associated with your device;
- Other unique identifiers such as advertising identifiers (e.g., "ad-ID" or "IDFA");
- Web browser and operating system information;
- Language of your device;
- Wireless connections you are using;
- Referring page that linked you to us;
- Your activities, including browsing and transaction history;
- Pages, content, and ads you view or click on during your use of our Services, and when and for how long you do so;
- The next web site you visit after leaving our web site; and
- Search terms you enter on our Services or a referral site.

In addition, we may deploy tracking technologies through our Services to collect additional information about your use of the Services, as set out in the "Cookies and other tracking technologies" section of this Privacy Policy.

2. How is your information used?

We or our service providers may use the information we collect from or about you to perform the following functions:

- administer our Services and your account with us;
- enable you to use our Services and their features;
- customize our Services to your interests and history with us;
- localize the content and articles that are displayed to you based on your geographical location;
- improve or develop new features and offerings in our Services;
- send you marketing and other communications, including information about products, services, or events that we think might be of interest to you;
- assess your level of interest in and use of our Services, e-mails, and other messaging campaigns, both on an individual basis and in aggregate;
- generate analytics reports on the usage of our Services; and
- respond to your requests, questions, and concerns protecting our rights and property.

We may also use Personal Information to meet our internal and external audit requirements and for information security purposes. Where permissible under applicable law, your

Personal Information may be used for other purposes, which will be disclosed to you at the time when your information is collected. There may be instances, however, when we will use your Personal Information for purposes that were not disclosed at the time of the data collection; for example, when doing so is necessary to comply with a legal obligation or requirement. We may use Personal Information to (a) respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (b) enforce our terms and conditions; and (c) protect our rights, privacy, safety, or property, or those of other persons.

Some of the uses specified above are necessary for the performance of a contract between us, or for the provision of a service requested by you. In other cases, the uses are based on our legitimate interests such as marketing our services to people who have expressed an interest in them or similar services.

3. How do we share the information we collect?

We may share your information:

- with our lawyers, auditors, and other professional advisers, third party providers of services such as cloud storage, customer relationship management systems, analytics databases, who need your information to provide services to us (or on our behalf);
- when we believe in good faith that disclosure is necessary to protect our rights or property, protect your safety or the safety of others, investigate fraud, or respond to a government agency, law enforcement, judicial or public authority, or other legal request, or to comply with the law;
- in connection with a proposed corporate change or dissolution, including for example a merger, acquisition, reorganization, consolidation, bankruptcy, liquidation, sale of assets or wind down of business.

We may share non-personally identifiable information about usage of the Services (including aggregate data) with others, for their own use, in a de-identified form.

In addition, what you voluntarily post to public areas of our Service may be available to other Service users.

Transfers outside the European Economic Area (“EEA”)

The information described in this section of the Privacy Policy, with respect to the transfer of data outside the EEA, applies to those individuals located in the EEA. To process information of individuals located in the EEA for the purposes set out in this Privacy Policy, it is sometimes necessary for us to share your personal data outside the EEA, for example:

- with service providers located outside the EEA;
 - if you are based outside the EEA;
 - where we consider that the transfer is necessary for exercising, establishing or defending legal rights including, as appropriate, providing information to respond to a government, law enforcement, judicial or other legal request, or otherwise to comply with applicable law.
- Non-EEA countries might not have the same legal framework for data protection as the EEA countries. In particular, the United States, which is the most common destination of

our transfers of Personal Information outside the EEA, is not considered to provide a level of personal data protection equivalent to that of the EEA. We will, however, ensure the transfers comply with EU data protection law. Our standard practice is to use standard data protection contract clauses approved by the European Commission as the basis for such data transfers. You may read more about this on the European Commission Justice website at (http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm).

If you would like further information, please see “Contact us” section below.

4. How do we secure your Personal Information?

We use reasonable technical, administrative and physical security measures to protect Personal Information collected via our Services. We cannot guarantee that any information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from unauthorized access or use (e.g., by hackers). You use the Services, and send us information, at your own risk.

If you correspond with us by e-mail, text message, or using a “Contact us” feature on our Service, a third party could view the information you send in transit by such means. We have no liability relating to disclosure of your information due to errors, omissions or unauthorized acts or failures to act by third parties during or after transmission.

If you create an account on our Services, you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any activity, including disclosure of your Personal Information, that occurs using your account credentials, whether or not you authorized such activity. Please notify us of any unauthorized use of your password or account or any other breach of security.

We have procedures in place to deal with any suspected data security breach. If we believe that the security of your Personal Information in our care may have been compromised, we will endeavor to notify you of that development promptly taking into consideration the circumstances. If we have your e-mail address, we may notify you by e-mail. Where legally required to do so, we also will notify any applicable regulator.

5. Cookies and other tracking technologies

We, and/or our service providers or partners on our behalf, may use tracking technologies which may run on your device when you use the Services. The circumstances in which we may deploy tracking technologies include:

- We may use cookies or local shared objects, such as “Flash cookies.” Cookies are small data/text files that store information, such as your preferences and account settings, on your computer. Similar to many other websites, if you have enabled cookies in your browser, we, independently and through enabled third-party tools and programs, collect certain technical information using cookies, such as originating IP address, browser type, browser language, how a user got to the Service (i.e., the URL of the last website you visited), the next website the user visits, what pages are visited, the length of each site visit, and the date and time of the user’s visit. This information helps us track trends and improve user experiences when using the Services

- HTML5 may be used to store information on your computer or device about your Service usage activities. This information can be retrieved by us to determine how our Services are being used by our visitors, how our Services may be improved, and to customize our Services for our users.
- We may send instructions to your computer or device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with the Service.

These tracking technologies may be deployed by us and/or our service providers or partners on our behalf. These technologies enable us to assign a unique number to your computer or device, and relate information about your use of the Services to other information about you, including your Personal Information. These technologies also enable us to recognize you when you access our Services using different web browsers or devices.

You can manage website cookies in your browser settings. You always have the choice to have your device warn you each time a cookie is being sent or change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain functions and features will not work as intended on the Services. All browser settings are slightly different, so to manage cookies, you should refer to the relevant settings within your browser. If you would like to obtain more detailed information about types of cookies, how they are used, and how you can manage your cookie preferences you may want to visit: www.aboutcookies.org or www.allaboutcookies.org. Please click below for detailed information on how to disable and delete cookies in some commonly used browsers:

- Mozilla Firefox®: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- Microsoft® Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>
- Google Chrome™: <https://support.google.com/accounts/answer/61416?hl=en>
- Safari®: https://support.Northfotople.com/kb/PH21411?viewlocale=en_US&locale=en_US

6. Links and connections to Third Party Services

We maintain a presence on social media and other external platforms, such as Facebook and Twitter. We may occasionally incorporate third party social networking features into our Services. This Privacy Policy applies to our use of information you submit to us there, but it does not apply to what those third-party platforms do with your information.

Our Services may allow you to share information with us that you have already provided to a third party social networking platform. For example, you may be able to create an account on our Service or log in to our Service using your Facebook account or other third-party credentials. If you do so, Personal Information or other data that you have provided to the third party may be made available to us by that third party subject to its own privacy policy, terms, and conditions. Privacy policies of social networks and other external platforms explain how those third parties use, protect, and share your information, including any information you share on those platforms from our Services, and we encourage you to read

them. The information we receive from these platforms may depend on your privacy settings. Any such information that we obtain will remain subject to that third party's privacy policy and we will use any such information in accordance with this Privacy Policy. We may also include tools in our Services that allow you to share or publicly post content from our Services to your profile on a third party social network. You may choose to share information about your activities on the Service with such third party platforms and its users, including publishing your information about what content you may have viewed on our Services. If you visit a Service while logged into certain social media platforms, the social media platform may be able to identify your browser and associate the technical information provided by your web browser with other information that they have already collected about you, which may result in their ability to identify you. In addition, when you choose to share information about your activities on the Service with certain social media platforms, Northfoto may send technical information about you to that platform as well as information about what content you are viewing.

Our Service may contain links, banners, widgets, or advertisements that lead to third-party web sites. We are not responsible for these other web sites, and so their posted privacy policies (not this Privacy Policy) will govern the collection and use of your information on them. We encourage you to read the privacy statements of web site visited after leaving our Services to learn about how your information is treated by others.

Our Services may contain certain co-sponsored content and you may be requested to provide additional Personal Information to the co-sponsor of such content. We will disclose to you when you are submitting Personal Information to co-sponsors. The information practices of any third party co-sponsors are governed by their own privacy policies and are not covered by this Privacy Policy.

7. Do Not Track Disclosures

Some web browsers may transmit "do-not-track" ("DNT") signals to mobile applications with which the user communicates. We currently do not change our tracking practices (which are explained in more detail under "Service Usage Information" above) in response to DNT settings in your web browser.

Our third party partners, such as web analytics companies and third party ad networks, may collect information about you and your online activities over time and across our Services and other online properties. These third parties may not change their tracking practices in response to DNT settings in your web browser and we do not obligate these parties to honor DNT settings. We utilize Google Analytics for our web analytics and you can opt out of your usage data being included in our Google Analytics reports by visiting <https://tools.google.com/dlpage/gaoptout>.

8. Your rights relating to your Personal Information

You may review, update or correct certain of the Personal Information that is stored in your user account in our Services (if you have one) by using the "Contact Us" information below. We may ask you to verify your identity and to provide other details before we are

able to provide you with any information, correct any inaccuracies, or delete any information. Your right to delete information is subject to our records retention policies. You can opt out of our promotional e-mails by clicking the opt-out/unsubscribe link within the e-mail you receive. Please understand that it may take us a few days to process any opt out request and that even if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions, and communications with us.

In some jurisdictions, including in the countries of the European Economic Area, you have the right, in certain circumstances, to (i) require us delete your Personal Information, (ii) require us to restrict processing of your Personal Information (for example, if you contest the accuracy of that information), (iii) receive a copy of the Personal Information you provided to us in a structured, commonly used, and machine-readable format and/or instruct us to transmit that data to a third party; and (iv) object to our continued processing of your Personal Information, for direct marketing (including profiling) or other purposes. You can exercise these rights free of charge by contacting us using the details in the “Contact us” section below.

9. Data Retention

Your Personal Information will be held for the purposes and uses set out in this Privacy Policy and for as long as there is a legal, taxation, accounting, risk management or business requirement to do so. Different retention periods apply to different types of records and data which are dependent on the nature of your interaction with Northfoto.

10. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. When we do, we will let you know by posting the changed Privacy Policy on this page with a new “Last Updated” date. In some cases, we may also tell you about changes by additional means, such as by sending an e-mail to the e-mail address we have on file for you.

11. Children’s privacy

The Services are not aimed at children. If, however, we collect and use information about children, we will comply with industry guidelines and applicable laws.

12. Contact us/complaints

If you have any questions or comments regarding our privacy practices, you may contact us at:

Northfoto Bt. Atlasz utca 15B 1165 Budapest, Hungary	+36-20-967-4096 administrator@northfoto.com

We hope that can resolve any query or concern you may raise about our use of your information.

Individuals located in the EEA have the right to lodge a complaint with a supervisory authority of the EEA state where you work or live or where any alleged infringement of data protection laws occurred. A list of the supervisory authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Effective Date: 25 May 2018