

**THE DATA MANAGEMENT POLICY OF BLUE COLIBRI INTERNATIONAL KFT.
FOR THE VISITORS OF THE
BLUECOLIBRIAPP.COM
WEBPAGE**

Applicable from: 13 September 2022
Version: 04

I. INTRODUCTION:

The **Blue Colibri International Limited Liability Company** (registered office: H-1027 24 Tölgyfa street 2nd floor, Budapest, hereinafter: the **Company** or the **Data Controller**) informs the visitors (hereinafter: **Users** or **Data Subjects**) of the webpage <https://bluecolibriapp.com/> on the processing of data arising from the use of the Website, on existing international and domestic data protection legislation, in particular REGULATION (EU) 2016/679 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, and repealing Regulation (EC) No 95/46 (General Data Protection Regulation, hereinafter: **GDPR**) and in accordance with the provisions of the Act CXII of 2011 on the right to self-determination and freedom of information.

Pursuant to Article 13 of the General Data Protection Regulation (hereinafter: GDPR), we are informing you in connection with the processing of personal data: (the terms used in this Policy shall be construed in accordance with the terms set out in the GDPR.)

The current version of this policy is available on the Website in the Data Policy menu. The Data Controller reserves the right to amend this policy at any time. Changes will be published by displaying a consolidated version of this policy, indicating the changes.

Please read this policy carefully, as this is the only way to get a complete picture of the rules governing data processing!

II. NAME OF THE DATA CONTROLLER

This policy is published by and the Data Controller is:

Company name: Blue Colibri International Limited Liability Company

Registered office: H-1027 24 Tölgyfa street 2nd floor, Budapest

Company registration number: 01-09-370771

Names of representatives: Viktória Fulai manager

Email address: hello@bluecolibriapp.com

III. NAMES OF DATA PROCESSORS

In the course of our activities, we use the services of the following data processors on the basis of a contract:

1. Website hosting and server provider:

Company name: Webflow, Inc.

Registered office: 398 11th Street, 2nd Floor, San Francisco, CA 94103, United States

2. Mail system provider:

HubSpot Ireland Limited

Registered office: 662880, Two Dockland Central, Guild Street Dublin 1, Ireland

3. CRM system and newsletter service provider:

HubSpot Ireland Limited

Registered office: 662880, Two Dockland Central, Guild Street Dublin 1, Ireland

4. Data processors of Blue Colibri Application:

4.1. Hosting provider: Microsoft Azure registered office: Redmond, WA 98052, United States

5. Event system provider:

Eventbrite Operations (IE) Limited

Registered office: 97 South Mall Cork, T12 XV54 Ireland

6. Digital Marketing Service Provider:

Prospect Global Ltd (trading as Sopro)

Reg. UK Co. 09648733.

You can contact Sopro and view their privacy policy here: <http://sopro.io>.

ICO Reg.: ZA346877

Adatvédelmi tisztviselő: dpo@sopro.io.

IV. SOURCE OF DATA

The source of the data is the Data Subject.

V. DATA MANAGEMENT

In the course of its activities related to the Website, the Data Controller performs the following data processing, which is indicated separately for the sake of transparency, indicating the type of data processed, the purpose of data processing, legal basis, data source, data recipients and data storage period.

1. Data management related to the use of the “Contact Us” feature of the Website

When using the <https://bluecolibriapp.com/> website, visitors to the website have the opportunity to make a direct inquiry, send us a message to request personalized information about our service and a free trial/demo. When establishing a connection, you must provide your full name, company e-mail address, company name, job title, company size and company location on the contact form so that we can respond to you. It is not necessary to provide other personal data (phone number, “how did you hear about us”, message) for sending the message, however, if the visitor also records such data in the text of the request, we will handle them during the data management related to the request. The personal data you provide when using the “Contact Us” menu will be processed for the purpose of customer management and to the extent necessary for that purpose. After responding to a request, we store data for one year to ensure effective communication and customer history.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
Website's "Contact Us" feature	Full name Company e-mail address Company name Job title Company size Company location Additional optional fields: Phone number “How did you hear about us” Message text	Answering inquiries, providing demos	Consent of the person concerned (Article 6 (1) (a) of GDPR)	Person concerned	Server provider as a data processor Mail service provider as data processor CRM system provider as a data processor	After responding to a request, we store the data for one year to ensure effective communication and customer history.

2. Data processing related to inquiries to our e-mail address and telephone number displayed on the website

The Visitor has the opportunity to contact us directly by e-mail and telephone. Requests received through these channels will be sorted based on the content of the request and the personal information provided during such contact will be handled for the purpose and to the extent necessary for customer management. After responding to a request, we store data for one year to ensure effective communication and customer history. If a customer relationship (contract) is established during the contact, we will provide a separate

data management policy.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
Inquiries to a central email address	Name E-mail address In addition, any additional information provided in the request	Answering inquiries, providing demos	Consent of the data subject (Article 6 (1) (a) of the GDPR), which is deemed to have been given by sending the message	Data subject	Server provider as a data processor Mail service provider as data processor	After responding to a request, we store the data for one year to ensure effective communication and customer history.
Inquiries to a central telephone number	Name E-mail address	Answering inquiries, providing demos	Consent of the data subject (Article 6 (1) of the GDPR), which is considered to have been given by calling the central telephone number	Data subject	-	Incoming calls to the central telephone number will not be recorded, data management is limited to the duration of the call
Records of requests for central contact	Name Phone number Company name E-mail address	Answering inquiries, providing demos	Legitimate interest (Article 6 (1) (f) of GDPR), follow-up to requests and action taken on them	Data subject	CRM system and newsletter service provider as a data processor	

3. Data management related to the use of the “Newsletter” feature of the Website

When using the <https://bluecolibriapp.com/> website, visitors to the website have the opportunity to subscribe to the Blue Colibri newsletter to receive the latest professional news. When signing up to the newsletter, you must provide your full name and company e-mail address on the contact for. Additional optional fields: company name, job title, company location.. After subscribing to the newsletter, we store data until withdrawal of consent.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
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Sending a newsletter	Full name Company e-mail address Additional optional fields: Company Job-title Company location	Sending newsletters, publishing regular information and promotions	Consent of the data subject (Article 6 (1) (a) of GDPR)	Data subject	CRM system and newsletter service provider as a data processor	Until withdrawal of consent
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4. Data management related to the use of the “Book a demo” feature of the Website

When using the <https://bluecolibriapp.com/> website, visitors to the website have the opportunity to request an online demo of the system. When requesting a demo, you must provide your full name, business e-mail address, company name, job title, company size and company location on the contact form so that we can respond to you. The personal data you provide when using the “**Book a demo**” menu will be processed for the purpose of customer management and to the extent necessary for that purpose. After responding to a request, we store data for one year to ensure effective communication and customer history.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
Website's " Book a demo " feature	Full name Company e-mail address Company name Job title Company size Company location Additional optional fields: Phone number “How did you hear about us”	Answering inquiries, providing demos	Consent of the person concerned (Article 6 (1) (a) of GDPR)	Person concerned	Server provider as a data processor Mail service provider as data processor CRM system provider as a data processor	After responding to a request, we store the data for one year to ensure effective communication and customer history.

	Message text					
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5. Data management related to the use of the “Downloads” feature of the Website

When using the <https://bluecolibriapp.com/> website, visitors to the website have access to downloadable knowledge materials(webinars, templates, checklists, etc.) produced by Blue Colibri. When requesting an access, you must provide your full name, business e-mail address, company name, job title, company size and company location on the contact form.. The personal data you provide when using the “Downloads” menu will be processed for the purpose of customer management and to the extent necessary for that purpose. After responding to a request, we store data for one year to ensure effective communication and customer history.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
Website's "Downloads" feature	Full name Company e-mail address Company name Job title Company size Company location Additional optional fields: Phone number “How did you hear about us” Message text	Answering inquiries, providing demos	Consent of the person concerned (Article 6 (1) (a) of GDPR)	Person concerned	Server provider as a data processor Mail service provider as data processor CRM system provider as a data processor	After responding to a request, we store the data for one year to ensure effective communication and customer history.

6. Data processing in connection with the use of the "Events" function of the website

By using the website <https://bluecolibriapp.com/>, the visitor of the website has the possibility to sign up for events organized by Blue Colibri International Llc. Upon making the contact, the contact form requires the user to provide his/her full name, e-mail address, company name in order to receive information about the event, as well as pre- and post-event communication materials. No other personal information is required to send messages. Data will be kept for one year from the date of the event to ensure effective communication and customer history.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
Website “Events” feature	Full name Company e-mail address Company name	Providing event-related information	Consent of the person concerned (Article 6 (1) (a) of GDPR)	Person concerned	Server provider as a data processor Mail service provider as data processor CRM system provider as a data processor	Data will be kept for one year from the date of the event to ensure effective communication and customer history.

7. Data management related to the demo version of the Blue Colibri Application

In case of inquiries through the above channels, we will provide our prospective customers with access to the demo version of the Blue Colibri Application (hereinafter: the Application) for a maximum period of 4 weeks. Using the demo version, our prospective customers can learn about the operation of the Application with limited use, during which it is possible to post, organize a trial event and start a voting.

For posting, other users with demo access can see who posted and when. When organizing a trial event, other users with demo access can see who is organizing the event and who has signed up. When starting a voting, other users with demo access can see who posted the poll. The organizer cannot see who voted, only the result of the vote.

Description of data management	Scope of managed data	Purpose of data management	Legal basis of data management	Source of data	Recipients of data management	Duration of data storage
In-app registration with demo access	Name E-mail address Username Password	Provide access to the demo version of Blue Colibri	Consent of the data subject (Article 6 (1) (a) of GDPR)	Data subject	Data processors recorded under section III./4.	Demo version for the right to use (up to 4 weeks)

Posting on the demo interface	Username Posting time Post content	Provide access to the demo version of Blue Colibri	Consent of the data subject (Article 6 (1) (a) of GDPR)	Data subject	Data processors recorded under section III./4. Other users with demo access	Demo version for the right to use (up to 4 weeks)
Creating a trial event on the demo interface	Username	Provide access to the demo version of Blue Colibri	Consent of the data subject (Article 6 (1) (a) of GDPR)	Data subject	Data processors recorded under section III./4. Other users with demo access	Demo version for the right to use (up to 4 weeks)
Starting a voting on the demo interface	Organizer user name How and when to vote	Provide access to the demo version of Blue Colibri	Consent of the data subject (Article 6 (1) (a) of GDPR)	Data subject	Data processors recorded under section III./4. Other users with demo access	Demo version for the right to use (up to 4 weeks)

8. Data management related to the use of cookies

Our website uses cookies to ensure its proper operation, basic and convenient functions for marketing purposes, and to generate anonymous statistics.

A cookie is a file (information packet) that is placed on a device used for browsing when a person visits a website. The use of cookies makes it possible to query certain data of the visitor and to record his / her Internet usage habits. In general, cookies can facilitate the use of a website, help the website to provide relevant information to the data subject, and provide the website operators with control over the operation of the website (for example to prevent abuse and to ensure the proper provision of the services available on the website).

Third-party cookies are also displayed on our website. In the case of cookies used by third parties, the third parties identified in the table in this document are considered data controllers. Our Company, as the Data Controller, has only a limited influence on cookies from third parties, such data processing is governed by the data management policy of the third party. You can find information about the Google Analytics cookie application at the following link: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>. You can access Google's privacy policy at the following link: <https://policies.google.com/privacy?hl=hu&gl=hu>

The data of cookies provided by third parties may be transmitted to these service providers if this is not prohibited by your browser settings. The data transmitted will be used by these third-party service providers as independent data controllers for their own purposes. If you do not wish to allow the transfer of your data, you can disable it by downloading and installing a browser module at <https://tools.google.com/dlpage/gaoptout?hl=en>.

By accessing the website www.bluecolibriapp.com, if the browser settings used by the Visitor allow it or this is explicitly approved by the Visitor on the first visit to the website, the website may automatically save information using these cookies. Enabling the use of cookies is voluntary. Cookies can usually be disabled in the browser's Tools/Settings menu, under Privacy, and/or under the Cookies menu.

By consenting to the use of Cookies during the first use of our website and by using the website, you accept the use of cookies in accordance with this cookie policy notice, which means that you accept the use of cookies placed by third parties for the purposes and conditions detailed below. If you do not accept the cookies or want to restrict them in part, please disable them by changing your browser settings so that the cookies on the website cannot be placed on your computer.

This cookie information is to be read in conjunction with our Privacy Policy, which contains detailed information about the identity and contact details of the data controller and the rights of the data subjects, which is also available on our website here.

You can find information about the cookie settings of the most popular browsers at the following links:

Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>

Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>

Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>

Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>

Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>

Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>

Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>

Safari: <https://support.apple.com/hu-hu/HT201265>

Our website uses the following cookies:

a. Definitely necessary cookies:

These cookies provide functions without which the Website does not function properly, the use of these cookies is absolutely necessary, the legal basis of the related data management is the legitimate interest of the Data Controller in the proper provision of the Website.

Own cookies:

Name of the cookie	Cookie provider	Data handled by the cookies	Purpose of the cookie	Duration of data management
Wordpress_sec_*	www.bluecolibri app.com	Not known	Data protection	15 days
wordpress_logged_in_	www.bluecolibri app.com	Username + hash	To keep the user logged in	During the session

b. Function and performance cookies:

These cookies collect data about visitors to the Website anonymously, using a customer identification code randomly generated by the cookie, for statistical purposes. These cookies allow us to monitor and improve the performance of our website, for example, to track the number of visits, identify the source of traffic and the most popular parts of the website, and allow the website to remember your choices (such as username, language). Based on the data, the Data Controller is not able to identify the Data Subject and does not take steps to identify the Data Subject. The legal basis of data management is the legitimate interest of the Data Controller to receive information about the website traffic and other data for statistical purposes and thus to have the opportunity to develop the website and increase its security. The data controller uses the data anonymously to compile and analyze statistics, no behavioral preferences are collected and no automated decision-making is made on the basis of this, and the Data Controller does not send personalized offers to users based on this.

Own cookies:

Name of the cookie	Cookie provider	Data handled by the cookies	Purpose of the cookie	Duration of data management
pll_language	www.bluecolibriapp.com	ISO language code	Storing language settings	1 year
wordpress_test_cookie	www.bluecolibriapp.com	Static string: WP+Cookie+check	Check if cookies can be placed on the page	-
prli_visitor	www.bluecolibriapp.com	Random hash	Tracking clicks	1 year

Third party cookies:

Name of the cookie	Cookie provider	Data handled by the cookies	Purpose of the cookie	Duration of data management
messagesUtk	www.bluecolibriapp.com	Hubspot chat history	to store browser data, to store operations performed on the website.	13 months
__hssc	www.hubspot.com	Not known	Not known	30 minutes
__hssrc	www.hubspot.com	Not known	Not known	During the session
__hsmem	www.hubspot.com	Not known	Not known	Minimum 1 session
hs-messages-hide-welcome-message	www.hubspot.com	Not known	Not known	1 day
hs-messages-is-open	www.hubspot.com	Not known	Not known	30 minutes
*_key	www.hubspot.com	Not known	Not known	Minimum 1 session
hs_ab_test	www.hubspot.com	Not known	Not known	During the session
__hs_do_not_track	www.hubspot.com	Not known	Not known	13 months
__hs_opt_out	www.hubspot.com	Not known	Not known	13 months
VISITOR_INFO1_LIVE	www.youtube.com	No	Bandwith estimation	6 months
YSC	www.youtube.com	Not known	Storing a unique user ID	During session

PREF	www.youtube.com	Browsing behavior	Store and track visits to websites	1 year
_ga	analytics.google.com	Not known	Count and track page views on the site	2 years
_gid	analytics.google.com	Not known	Count and track page views on the site	1 day
_gat_gtag_UA_*	analytics.google.com	user ID	Storing a unique user ID	2 minutes

c. Marketing cookies:

The purpose of using marketing cookies is to select the ads that are most interesting or relevant to our visitors and display them on our website. The legal basis for data management is the consent of the Data Subject, which he or she can make in the pop-up cookie window during the first visit to the site. In the pop-up cookie window, only the Absolutely Necessary Cookies and the Function and Performance Cookies checkbox are checked (the legal basis for their use is not the user's consent), consent to the use of Marketing Cookies is given by ticking the Marketing Cookies checkbox. If the user does not change the predefined checkmarks, the Marketing cookies will not be installed automatically.

Third party cookies:

Name of the cookie	Cookie provider	Data handled by the cookies	Purpose of the cookie	Duration of data management
hubspotutk	www.bluecolibriapp.com	Not known	Store and track visitor identity	13 months
__hstc	www.hubspot.com	Not known	Store visit time	13 months
GPS	www.youtube.com	Location data	Store location data	During session
_fbp	www.facebook.com	Not known	Store and track visits to websites	3 months

INFORMATION ON THE RIGHTS OF DATA SUBJECTS

In connection with the present data management, the User has the following rights:

1. **Right of access to personal data:** The data subject has the right to receive feedback from the Data Controller as to whether the processing of his or her personal data is in progress and, if such data processing is in progress, he or she has the right to access the personal data and information specified by law. Based on this, the Data Subject has the right to contact the Data Controller and request information on the processing of his / her data, as well as to request access to his / her

data.

2. **Right to rectify data:** In the event of a change in your data, the data subject may at any time request the correction of his or her data by providing the correct data.
3. **Right to delete data:** The data subject has the right to request the Data Controller to delete his / her data if the data processing is no longer necessary for the purpose for which the data were recorded, if the data processing is illegal or if the deletion of the data is required by law.
4. **Right to restrict data processing:** The data subject may request a restriction on the data processing if the data processing is illegal if the data controller no longer needs the data for the purpose of data processing, but the data subject wishes to use them to submit a legal claim. Restrictions on data processing mean that the data may only be stored until the restriction is lifted and can only be used to make a legal claim.
5. **Right to object to data processing:** The data subject has the right to object to the processing of his or her personal data at any time for reasons related to his or her own situation. In such a case, the Data Controller shall individually examine whether there is a legitimate reason justifying the need for data processing.
6. **Right to data portability:** The data subject has the right to receive from the Data Controller the personal data processed by him or her in a structured, widely used machine-readable format and to transfer this data to another data controller without being hindered by the Data Controller. When exercising the right to data portability, the data subject shall have the right, if technically feasible, to request the direct transfer of personal data between data controllers.
7. **Right to lodge a complaint with a supervisory authority:** The data subject has the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information. (Address: H-1055 9-11 Falk Miksa Street, Budapest, H-1363 Budapest, PO BOX 9)
8. **Judicial enforcement:** The data subject has the right to apply to a court if, in his or her opinion, the Data Controller or a data processor acting on his or her behalf or at his or her disposal handles the data of data subject in violation of the regulations on the processing of personal data.

VI. DATA SECURITY

The data controller ensures the security of the data. To this end, it shall take the technical and organizational measures and shall establish the procedural rules necessary to enforce the applicable laws, data and confidentiality rules. The data controller shall take appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as against accidental destruction and damage, and from becoming inaccessible due to changes in the technology used. The Data Controller (also) ensures the enforcement of the data security rules by means of internal regulations, instructions, and procedures separate from the present Policy. When defining and applying data security measures, the Controller shall take into account the technology development level and shall choose from a number of possible data management solutions which ensure a higher level of protection of personal data, unless this would be a disproportionate difficulty.

The fact of automated decision making, profiling

Please note that we do not use automated decision-making or profiling.

If you have any questions about the handling of your personal information, please contact us at hello@bluecolibriapp.com.