



## Privacy Policy



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This Oxyprogram Privacy Policy sets out how ***Oxytree Europe Zrt.*** (hereinafter referred to as the “**Company**”), with its registered office located at Soroksári út 48., 1095 Budapest, uses any personal data that may be collected or that you (hereinafter referred to as “**Client**” or “**you**”) may provide at [oxyprogram.com](https://oxyprogram.com) (hereinafter referred to as the “**Website**”) when you use the Website. It defines the ways and methods the Company uses to collect your personal data; the types of personal data that may be collected; the ways and methods of using and transmitting such data; the measures the Company takes to protect your personal data and your rights; and the ways you can contact the Company regarding the data management practices of the Company.

## Ways and methods the Company uses to collect Client's personal data

Personal data can be collected by the Company when

- Client registers on the Website;
- Client contacts our personnel via e-mail or by phone; and
- Client fills out any offline or online form (such as signing up for a newsletter).

The Company may use so-called cookies, and other methods similar to cookies to collect certain information with regard to the use of our Website, especially when you log in, view and browse the Website. A cookie is a small data file which is placed on your computer's hard drive or on your mobile device when viewing websites. Cookies may be used for various reasons, for example they help us analyse web traffic or your likes and dislikes and preferences. You can choose to accept or decline cookies. This option is usually found in your web browser's Settings or Internet settings menu. It is to be noted, however, that modifying your web browser settings to decline cookies may prevent you from taking full advantage of the Website. Some functions may not work smoothly or the Website may not allow you access. Cookies do not collect your personal information.

In each case before collecting any data, the Company calls the attention of Clients to the fact that data will be collected. The Company may only collect personal data once a Client has read, understood and also accepted this statement. If a Client does not accept the use of "cookies," he/she can set his/her browser to reject cookies. Also, stored cookies can be removed from any device by Clients at any time. Therefore, whenever you provide any information, it is done on a completely voluntary basis. Clients cannot be obliged to enter their personal data. However, Clients must also accept the fact that if they do not enter their personal data, they will not be able to view or access certain content.

Clients have the right to request in writing that the Company delete all their personal data and cancel their registration with the Company at the same time.

## Types of personal data that may be collected by the Company from Clients

The Company may collect contact information including your name, address, e-mail address, date of birth and phone number on the Website. In order for us to be able to verify your identity, the Company may ask you to send in scanned copies of your ID documents clearly showing your name, photo and address, and the number of your taxpayer ID document, as well as scanned copies of such documents.

By registering on the Website, you agree to give the Company your permission to request from you scanned copies of your ID documents clearly showing your name, photo and address as well as a scanned copy of your taxpayer ID document, and to store such copies in accordance with the KYC (Know Your Customer) procedure followed by the Company. We would like to inform you that it is not a legal obligation to provide copies of your documents, but if you do not, you will not be able to withdraw money from your Cash Account using the online interface.

You may also voluntarily provide the Company with more personal information about you when asking questions or making comments. However, we suggest providing only those personal data that are absolutely necessary for you to get a satisfactory response to your inquiry.

The Company does not collect sensitive data, i.e. data which show racial, national or ethnic origin, political opinion or affiliation with any political party, religious or philosophical beliefs, membership in an advocacy organisation, health status, addiction, sexual life or criminal record. If the Company

becomes aware of the fact that a Client has entered sensitive data, as defined in the provisions of the Privacy Act, in its database, such information will be deleted immediately, and the Company has the right to cancel the registration of that Client.

Therefore, we strongly urge you not to provide any data regarding your racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, health status or sexual life.

## The purpose of processing personal data

The Company uses your personal data to

- respond to your comments and inquiries;
- meet its contractual obligations, and be able to provide you with the products, services and other benefits under its program;
- produce accounting documents for your purchases;
- inform you of your tax-related and other legal obligations;
- be able to identify you by keeping records on you, thus complying with its legal obligations against terrorism and money laundering.

## Persons or entities to which the Company may transmit Client's personal data

The Company will not sell, distribute or lease your personal information to third parties. The Company may not transmit your personal data to third parties. Third parties may only receive such data if required by law, orders issued by the authorities or courts.

## Measures taken by the Company to protect Client's personal data

The Company is committed to ensuring that your personal data is secure. In order to prevent accidental, unauthorised or unlawful destruction, loss, alteration, access or disclosure or use of your personal data, the Company takes all appropriate measures.

Furthermore, the Company also has strict internal data management policies to ensure that unauthorised persons cannot access Client data. According to these internal data management policies, only authorised persons can access your personal data.

## How long the Company stores Client's personal data

Unless the law provides otherwise, your personal data will be stored until such time that they are required by the Company to perform its client management tasks successfully-

## Links to other websites

Our Website may contain links to third party websites of interest. These third party websites have their own privacy policy and data protection practices, which may be different from ours. Therefore, the Company cannot be responsible for the protection and privacy of any information you provide while visiting such third party websites. You should exercise caution and look at the privacy statement applicable to the website in question before providing any personal data or other information to such third party websites.

## Modification to our Oxyprogram Privacy Policy

The Company reserves the right to modify this Oxyprogram Privacy Policy at any time. Changes become effective on the date of publication on this Website.

## Miscellaneous provisions regarding Clients

A Client has the right to request modification, rectification and deletion of his/her personal data. A Client may also withdraw the consent he/she has given regarding management of his/her personal data, without any justification, in part or in whole, with the exception of personal data which has to be stored by the Company to be in compliance with applicable laws or to perform a contractual obligation laid out in an agreement between the Company and the Client concerned. The Company will take immediate action to cease processing data relating to a Client upon receipt of notification from the Client about his/her withdrawal of such consent. The Company will permanently delete the personal data in question from its database, while calling the attention of the processor and other persons involved in processing to also delete whatever data they might have in relation to the request. Finally, the Company will inform the Client about all of these actions.

## Company contact information

If you have any comments or questions about this Oxyprogram Privacy Policy, please contact us by using the contact details below:

### **Oxytree Europe Zrt.**

Soroksári út 48.

1095 Budapest

E-mail: [support.en@oxytree.com](mailto:support.en@oxytree.com)



Peter Gaspar CEO  
Oxytree Europe Zrt.