

PRIVACY POLICY

Unlimited System Builders Zártkörűen Működő Részvénytársaság (seat: H-4025 Debrecen, Simonffy utca 4-6. 1. em. 123.; company registry number: 09-10-000597; “**Operator**” or “**Data Controller**” or “**We**”) as the operator of the website www.rocketsshepherd.com (“**Website**”) is committed to protect the privacy of its – potential – users, therefore pays close attention to ensure that the collection, management, use, processing and possible transfer of personal data are conducted in accordance with the provisions of the relevant laws, national and international recommendations with special regard to the *Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* (“**GDPR**”).

By signing up, registering or using the Website, also by providing your consent via email you acknowledge that you have become aware of the contents of this privacy policy and agree that the Operator as data controller shall treat and record the information provided by you or collected from publicly available sources or third parties in accordance with the applicable law; at the same time, you agree that your contact details will be recorded and stored in the Operator’s Database in order to inform you about the services, changes thereto, other changes affecting you, and news relating to the Operator as described below in more details.

This privacy policy also applies to visitors to the Website, our contractual partners and our performance assistants and contributors.

This privacy policy will explain how we use your personal data on the Website.

1 DEFINITIONS

API	Application programming interface;
Consent	Voluntary and determined expression of the will of the data subject which is based on appropriate information, and by which the data subject gives his/her unambiguous consent to the complete or specific processing of personal data concerning him or her;
Data Controller or Operator or We	Unlimited System Builders Zártkörűen Működő Részvénytársaság (seat: H-4025 Debrecen, Simonffy utca 4-6. 1. em. 123.; company registry number: 09-10-000597);
Data Privacy Incident	Unlawful handling or processing of personal data, including in particular unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction or damage;
Data Processing	Regardless of the method used, any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, including but not limited to collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Data Processor	Any natural or legal person, or any organization without legal personality, which processes personal data on behalf of the Data Controller;
Data Subject or You	Any natural person who is identified or identifiable – either directly or indirectly - on the basis of any specified personal data;
EEA State	Member state of the European Union and other state that is member of the Agreement on the European Economic Area, furthermore, state citizen of which shall enjoy the same legal status as a citizen of a member state of the European Economic Area, based on the international agreement concluded between the European Union and its member states and states that are not members of the Agreement on the European Economic Area;
Electronic Logbook	An automated processing system for the purpose of ensuring the verifiability of the lawfulness of processing operations carried out with Personal Data by electronic means;
Personal Data	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Collectively all information that was submitted to the Website;
Profiling	Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
Third Country	Any state that is not an EEA State;
Third Party	Any natural or legal person or any organization without legal personality, who is not the Data Subject, the Data Controller or the Data Processor;
Website	www.rocketshepherd.com .

2 YOUR DATA CONTROLLER AND ITS CONTACT DETAILS

Company name: Unlimited System Builders Zártkörűen Működő Részvénytársaság

Seat: H-4025 Debrecen, Simonffy utca 4-6. 1. em. 123.

Company registry number: 01-10-049363

Website: www.rocketsshepherd.com

Contact person: [dr. Kuzder Judit](#)

Contact details: kuzderjudit@yahoo.com, info@rocketsshepherd.com

3 SCOPE AND LEGAL BASIS OF THE DATA PROCESSING

We only process Personal Data of individuals who agreed to the processing or transferring of their personal data to third parties (including but not limited to other users of the Website) or if it is ordered by law or decree of the local government - adopted on the basis of any act, within the scope specified therein - for public interest purpose.

The Operator manages the data of the

- (i) registered users of the Website;
- (ii) persons whose Personal Data is available in public databases or/and websites which operators are entitled to transfer personal data to third parties based on the Consent of the Data Subject.

3.1 Sources of Personal Data

Personal Data are either (i) provided by You or (ii) provided by a registered user or (iii) partially inferred from publicly available sources over which you have full editing control that are referenced for your benefit and to enable the services the Operator provides.

3.2 Data Processing based on your consent

By (i) submitting your Personal Data to the Operator through the registration process, (ii) verifying your Consent to the Data Processing via email without visiting the Website, (iii) submitting Personal Data while using the Website without registration, your consent to data processing is deemed to be granted. By storing the information provided during registration, the Operator is enabled to provide a more convenient service but registration is nevertheless optional.

Your Consent is deemed to be granted when You (i) click to the relevant box of the pop-up message of the Website, (ii) send personal data to our postal, email or other address, (iii) make technical settings while using information society services, and (iv) make any other statement or action which clearly indicates, in the given context, that it is your Consent.

By submitting your personal information to us, you warrant that you are entitled to such processing including in particular the transfer of data and that all data provided are accurate. The Operator disclaims all liability for any claim made in connection with the breach of the above warranty, and at the same time, You shall be liable for any loss or damage suffered by the Operator as a result of the falsity or mistake of these warranties.

3.3 Data gathered from publicly available resources

The Operator uses application programming interface (“**API**”), crawling and scraping software to collect information on natural and legal entities and create a database where the natural persons are linked to the legal entity they work in or for. The Operator creates a profile on the Website for each legal entity and lists every natural person in connection with it who marked themselves professionally connected to the legal entity on an online interface.

Once the profile is established, the Operator notifies the particular persons on the processing of their Personal Data and their related rights and options, in line with the applicable laws, without delay. The profile is not reachable for public and the data therein cannot be transferred until the Operator has procured the Consent of the Data Subject.

The Website does not crawl, scrape or otherwise retrieve any data whatsoever except through the interfaces that support direct, non-automated use by users.

3.4 Scope of the processed data

3.4.1 Account information

When You sign up to our Website, your name, email address and password are required to create a personal account. Once you have an account, you can edit your personal profile with the information you acknowledge that you would like to make public to make use of our services and to connect/link yourself to companies to which You would like to make it known that You are publicly affiliated. You may choose to share your social media profiles, sex, and video links as well.

3.4.2 Information You connect to your account

We are a database of real identities. You can connect your identity to a company, startup or other organization by ‘claiming’ that listing and following our prompts that cross-check your personal information (name, email, corporate email, public social media, public corporate databases) to verify that You indeed have editing rights to that listing. You can edit your preferences for any connections and You can hide, edit and remove any personal information associated with publicly viewable companies at any time. To the extent of our services, only your name, profile picture, job position and selected social media page link shall be shared publicly when connecting your personal profile to a company listing.

3.4.3 Information You provide otherwise

If You contact us (via email, phone, chat or through third party services) for technical support or to inquire about any of our services, You may share information about your company listings or personal profile that may be recorded on your behalf. You can edit any information added to your personal profile or company listings at any time at your convenience.

3.4.4 Information provided to make payments

If You opt to upgrade to our premium services or to pay to access third party services, or if we need to send You money, we may require that You provide bank information, payment card details and names of people responsible for payment or billing contacts. We do not store payment card details and all payments are processed and handled by third party payment processors. While some of the payment pages’ interfaces may resemble our livery, they are operated by such payment processors, which we may choose to change per our full discretion.

The Operator also may process Personal Data if it is required for Know Your Customer (KYC) and Anti-Money Laundering (AML) purposes, and when We need to process your information to execute payments.

3.4.5 Information we automatically receive when You use our services

The only personally identifiable information that is collected by automated systems that are necessary to operate the Website or when You take specific actions while using the Website include your name, job position, public profile picture and social media handle. These are necessary to

provide the service and give You a base profile that You can edit, hide, delete at your discretion at any time.

4 PURPOSE OF THE DATA PROCESSING

The Operator gathers different types of Personal Data to improve its services, in order to personalize valuable features for your benefit, also to enable You to set up an account and customize your public personal profile to help improve the discoverability of the companies which may be connected to your personal account that You may wish to render publicly discoverable.

The Operator is focused on corporate listing data and trends rather than personal information to provide value to our users. The personal information as aforementioned is solely made public via personal profiles (at a user's sole discretion) to contextualize associated company profiles and improve the discoverability of those companies and their affiliated contacts to the startup world, whose benefit it is to usually be visible online to increase their search engine optimization (SEO) and discoverability to be contacted for funding, marketing or commercial purposes.

We use your personal information to help You log in, authenticate You and your associated company administrators, to edit settings, and provide support. Your name, profile picture, job position and social media handle are used to identify You when You connect with or contact other users through our services. We use your personally identifiable information as it relates to your publicly visible company profiles to personalize our services, our product recommendations and offers and to match your company, not your person, to prospective business or amelioration opportunities. We may provide your name, company affiliation, email and company connections to other users when You get a benefit from them, such as getting an invite to attend an event, getting suggested an event that may be relevant to one of your company listings, to offer funding opportunities and similar.

When you connect with other users using our Website, such as a startup or an incubator or accelerator's program, You acknowledge that You are interested in receiving more information from them, for which We enable them to connect with You per your submitted contact information so as to provide the experience and beneficial values of our services.

In its operation, the Website may display content of or direct people to external websites and connects the users with each other who – based on the research of the Operator - might be interested in a business cooperation.

We may provide access to our partners to generally post advertisements on the platform that our service may automatically notify You of (via email, internal message, phone call) depending on the preferences You have set. These are intended to provide the service and provide value for improving the company listings associated to your personal profile.

Accordingly, the purpose of the data processing is as follows:

- (i) using the services of the Operator;
- (ii) creating and managing a user account in the Website;
- (iii) service development;
- (iv) maintaining contact between the Operator and the users;
- (v) enable users to find economic opportunity, express opinions, exchange information, and conduct business;

- (vi) conducting direct marketing activities;
- (vii) providing support services, including answering any questions you may have about the services advertised by the Operator;
- (viii) enhancing the security and safety of the Website and other users, such as by investigating suspicious activity or violations of applicable terms or policies;
- (ix) to identify and fix bugs that may be present; and
- (x) conducting data and system analytics, including research to improve the service.

5 DURATION OF THE DATA PROCESSING

Unless a longer retention period is required or permitted by law, we will hold your Personal Data on our system for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Personal Data be deleted or depersonalized. Even if we delete or depersonalize your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

6 PROFILING

The Operator creates a database where it collects all publicly available and voluntarily provided information on the business of the affected legal and natural entity and matches the presumed needs with the offers by contacting them through their email address or profile.

In case the Personal Data of the Data Subject is collected from publicly available sources, the Operator will automatically create a profile on the Website for the Data Subject and the company he/she works in or for. The profile is not reachable for public and the data therein cannot be transferred until the consent of the Data Subject is procured.

Operator represents that profiling is conducted in line with the applicable laws.

The profile includes the Personal Data of the Data Subject, especially but not limited to name, photo and link to the social media profiles of the Data Subject.

Editing the profile shall be deemed as consent to the transfer of any Personal Data indicated therein and to make the profile available to other users and the public.

We do not share any personally identifiable information about You in any of our reports. We may refer anonymously your data and to batch your de-identified Personal Data into groups that reflect trends. Our reports focus on corporate trends that pertain exclusively to companies with general trend information about the teams that manage those companies.

7 E-LOGBOOK

For the purpose of ensuring the verifiability of the lawfulness of processing operations carried out with Personal Data by electronic means, the Operator records in an automated processing system (“**Electronic Logbook**”)

- (i) the scope of the personal data affected by the processing operation;
- (ii) the purpose of and the reason for the processing operation;
- (iii) the exact time of carrying out the processing operation;
- (iv) the person carrying out the processing operation;
- (v) the recipient of the data transfer if data transfer is implemented.

The Personal Data recorded in the Electronic Logbook may only be accessed and used for the purpose of verifying the lawfulness of processing and enforcing data security requirements, as well as conducting criminal proceedings.

At the request of the authority or a person or organisation engaged in an activity specified by the law for a purpose described in the above paragraph the Operator shall provide access to the Electronic Logbook and shall transfer data from the logbook to the requesting party.

The data recorded in the Operator's record, as well as the Electronic Logbook, shall be retained for 10 years after the deletion of the processed data.

8 PERSONS WITH ACCESS TO PERSONAL DATA

Personal Data provided to the Operator may be known and handled by the Operator's employees, executives, consultants, data processors to whom You consented for your Personal Data to be transferred.

In accordance with the legal requirements, courts and certain authorities have the right to ask for Personal Data processed by the Operator. The court, prosecutor's office and other authorities (e.g. police, tax authorities, Hungarian National Authority for Data Protection and Freedom of Information) may contact the Operator for provision of information or documents or data transfer. In these cases, We have to fulfil our reporting obligation to the extent necessary to achieve the purpose of the request.

9 HANDOVER AND TRANSFER OF DATA

By using the Website - in order to achieve the Website's purpose – You expressly consent to the transfer of your Personal Data to the other users of the Website.

We only share Personal Data with third parties if it is required by law, requested by a government entity with due reason, to protect ourselves and users from harm or illegal actions and the general integrity of our services, to respond to an emergency, to fulfil support requirements, or in order to execute a service ordered by You. Our partners include third parties who deliver certain elements and parts of our services. We may utilize such partners to process payments, localise services for your region, deliver elements of services to features, provide support for certain programs and premium services. We may share information with our affiliates to operate affiliate programs. These include data that are outlined in partner and our cookies policies. This data is intended to internally track when You are routed to partner websites to make purchases or benefit from complimentary services. We may share personal data with affiliates to provide their professional services in order to deliver a financial, technological or commercial service to You on our behalf if required. These may include designing infographics, preparing videos and promotional materials to providing mentoring and consulting services when requested.

If there is a significant change in ownership to our business (acquisition, merger, bankruptcy, sale of our assets or similar) then we shall notify you as soon as possible. When a service requires sharing your personal information with third parties, we explicitly request your consent. For example, when a company You are connected with applies to an investor for funding or an incubator's program, we shall transfer elements of their requested application form to that partner per your profile settings to provide a service of not having to repeatedly complete the same information in similar data fields.

Further to the above primary transfer, the Operator shall rely on the assistance and services of data processors (in particular, but not exclusively accountants, IT service providers) for its data

controlling activities. Data Processing is carried out on the basis of a data processing contract concluded between the Operator and the data processor, which ensures the data processor's confidentiality obligation and thus the security of data processing.

We may share Personal Data provided to us in specific cases with third parties who cooperate with us or act on our behalf if this is necessary to achieve the purpose for which the data has been provided. However, We made sure that these third parties shall properly protect the information and data.

The Operator may use external service providers for routine server maintenance, data storage, or other IT tasks in accordance with generally accepted privacy practices.

As soon as the conditions for the lawful control or transfer of data are not met, the Operator shall promptly take action to erase Personal Data from the database and notify You of the fact of erasure.

10 TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

Your Personal Data may be forwarded to third countries, especially to the United States of America, because in certain cases the employees, contractors, sub-contractors of the Operator are located outside of EEA states and perform services from these states. In this case – such as in case of data transfer within the EEA – the transfer of data is conducted in compliance with the applicable laws.

11 DATA SECURITY

Personal Data stored in the electronic information systems or the ordinary paper data carriers is processed with the utmost discretion as strictly confidential, and the Operator protects them by all legal means, particularly by technical and organisational measures against unauthorised access, alteration, transfer, publishing, other abuse, erasure and eradication or accidental loss. Within the scope of organisational measures, we ensure surveillance of physical access to our buildings, and store our paper documents confidential with adequate protection and the Personal Data may only be accessed by duly authorized staff that have undertaken confidentiality.

We collect information from multiple sources and your input and primarily store them on global servers that are based in the European Economic Area and in the United States. These server providers, due to their locations, may have different data privacy standards than those that apply to the Central and Eastern European area.

We will use technical and organisational measures to safeguard your Personal Data. The Operator securely stores your data in the secure cloud services of Amazon Web Services (AWS). The RocketShepherd portal data is provided by this cloud provider's storage infrastructure. Services responsible for storage are not provided via a public network but a private network. Only services necessary for the operation of the platform are available to the public (located within the AWS VPC), and these are only accessible by providing a username and password. Access to data even within the closed private network protected by username and password. All services involved in the infrastructure are continuously updated to the highest security standards. Meanwhile, all RocketShepherd personal profiles are only accessible by username and password.

The closed IT system of the Operator offers adequate protection for the processing of Personal Data in electronic information systems, the authenticity and validity of data is ensured, the Personal Data is unaltered, and protected against unauthorised access. We and our partners ensure the protection of the Personal Data and only strictly use them with purpose limitation. Only authorised persons have access to Personal Data, the authenticity and validity of Personal Data is ensured, the Personal Data is unaltered and protected against unauthorised access.

The Operator ensures the security of Personal Data through such technical, management and organisational measures, which offer a level of protection appropriate for the risks arising in connection with Data Processing. We have adopted widely accepted technological and operation safety solutions in order to counter the loss, alteration, eradication or abuse of identifiable Personal Data. We make every effort to ensure the protection of Personal Data processed by the Operator through appropriate confidentiality and technical and security measures.

12 INTELLECTUAL PROPERTY RIGHTS

The Operator represents that the data collected on the Website is a database on the basis of Section 60/A Subsection 1 of *Act 1999 on Copyright*. The infringement of the rights indicated in the Copyright Act may lead to legal consequences.

13 COOKIES

Cookies are stored on the browser or hard drive of your computer or mobile device when someone visits or browses a webpage, based on their consent. The most frequent purpose of cookies is to elevate user experience and data collection regarding the use and visitation of the webpage. Cookies do not identify the visitor and are not appropriate to run applications or viruses. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information.

When You visit our Website, We may collect information from you automatically through cookies or similar technology.

The cookies gather statistical data relating to the visits to the Website (e.g. number of visitors, approximate geographical location etc.).

The Operator uses the statistical data received regarding the traffic and use of the Website for the development of the Website.

You can delete the cookies at any time and set your browser to prevent the use of cookies. However, while blocking the use of cookies, occasionally the Website may not operate as expected and designed.

13.1 Log information

Upon your consent, We may collect log information about your use of the Website, including the type of browser that you use; the time, duration and frequency of your access; your IP address; and the previous website from which you accessed RocketShepherd.com. We may transfer this information for third parties for direct managing our marketing.

13.2 Device information

Upon your consent, We may collect information about the computer or mobile device that You use to access our Website, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

13.3 Location information

Upon your consent, We may collect information about the location of your device each time you use our Website. We may transfer this information for third parties for direct marketing purposes.

We use cookies to provide more personalized services for our users and to measure the efficacy of the affiliate marketing programs (*cross-selling services*) we provide third party partners via the website's Collections section or similar. The Collections section displays different topic-based third party products & services that users can utilize to meet their individual needs. When a user clicks on any of these, they are linked to that item's third party website. In order to manage and measure these affiliate marketing services and their clickouts, RocketShepherd collects cookies. These cookies may be shared with a third party service, but exclusively to a third party service provider that only helps RocketShepherd in aggregating all of the clickout metrics from its website in one place for billing & accounting purposes.

14 LINKS TO OTHER WEBSITES

The Website may contain links, call to action buttons to links or promotions that highlight other affiliate or partner websites not operated or controlled by us. We are not responsible for the content, accuracy or opinions expressed on such websites, and We do not consistently monitor or check for accuracy or completeness on these websites. In providing our services, We strive to ensure that only the most relevant partners of the highest quality are recommended, promoted or shown to users. Your browsing and interaction on any other website linked to from www.rocketsshepherd.com, are subject to that website's own rules and policies. Such third parties may use their own cookies or other methods to collect information about you, for which We bear no responsibility.

15 YOUR RIGHTS IN CONNECTION WITH DATA PROCESSING

15.1 Request for information, right to access

You have the right to request copies of the information We hold about You at any time, furthermore about the source, purpose, legal basis, duration, data processor's name, address and activities related to data processing, as well as the legal basis and recipient of the data transfer.

Requests for information may be sent to the Operator in writing via post, by email to the attention of the Operator's data protection officer (please see the officer's contact details in section **Hiba! A hivatkozási forrás nem található.** below). The Operator shall provide the information to the address provided by You in writing, as soon as possible but at the latest within 30 days counted from the delivery of your request.

Please be informed that information on any data is provided free of charge, unless your request is manifestly unfounded or excessive.

15.2 Correction

You have the right to have your Personal Data rectified if it is inaccurate or incomplete.

If You inform the Operator that your Personal Data being processed is inaccurate or incomplete or the Operator itself becomes aware of the inaccuracy during the operation of the Website, the Personal Data will be corrected by the Operator.

The Operator will notify You of the correction or of the rejection of your request for rectification.

15.3 Erasure

You have the right to request the deletion or removal of your Personal Data from our systems.

Personal data shall be blocked if, on the basis of our information, it is presumable that the deletion would harm your legitimate interests. The blocked Personal Data shall only be processed for as long as there is a particular purpose for the data processing which prevented the deletion of the Personal Data.

The Operator will notify You of the erasure or the blocking, or of any refusal of your related request.

15.4 Marking

The Operator shall mark the personal data it processes if the you dispute its correctness or accuracy but the inaccuracy of the disputed personal data cannot be clearly established.

15.5 Objection or Restriction of Processing

You have the right to ask us to stop using all or some of your Personal Data or to limit our use of it.

The Operator shall examine the objection or restriction request as soon as possible, but not more than 15 days from the submission of the request, and shall make a decision on its merits and inform you in writing of its decision.

If the request is well founded, the Operator shall restrict the data process accordingly or terminate the processing of the data, including further data collection and transfer, shall block the data, and inform all persons to whom the Personal Data subject to the objection have previously been transmitted, and who are required to take action to enforce the right of objection.

15.6 Data portability

You have the right to receive Personal Data made available to us in a structured, widely used, machine-readable format, and to transfer such data to another data controller without any hindrance from us.

15.7 Non-cooperation in direct marketing

You have the right to refuse cooperation in relation to so-called direct marketing letters at any time without giving any reason. Within this framework, You have the right to refuse or prohibit the inclusion of your name on the contact or acquisition list, the use for direct marketing purposes.

If You have agreed to receive marketing, You may always opt out at a later date. If You no longer wish to be contacted for marketing purposes, please write to info@rocketshepherd.com .

15.8 Notification of change of data

You are entitled and obliged to report any changes in the data processed by the Operator within 15 days. You are solely responsible for the consequences of your failure to do so.

15.9 Withdrawal of consent

The legal basis of Operator's data processing is your consent, You may withdraw your consent to the data processing at any time, without prejudice to the legal basis of the data processing prior to the withdrawal of the consent. We shall not process your Personal Data after your consent has been withdrawn and it shall be erased from our records of any kind.

15.10 Right to legal remedy

You may seek the advice of the National Authority for Data Protection and Freedom of Information (address: H-1125 Budapest, Szilágyi Erzsébet fasor 22 / c.) in relation to complaints

regarding the protection of Personal Data and data processing issues, and may seek legal remedy before a court. Should you wish to report a complaint or if you feel that Operator has not addressed your concern in a satisfactory manner, you may contact the authority via the below contact details:

Postal address: 1530 Budapest, Pf. 5.

Email: ugyfelszolgalat@naih.hu.

16 RESTRICTION OF RIGHTS

In exceptional cases, the above rights may be restricted by statutory provision, in particular to protect the rights of the data subject or others.

The Operator shall provide data contrary to your data processing statement to any authorized entity, in cases determined by law exclusively.

17 DATA PROTECTION OFFICER

Operator shall employ a data protection officer to comply with the applicable laws and fulfill the rights of the Data Subject.

The name of the data protection officer: dr. Kuzder Judit

E-mail address: kuzderjudit@yahoo.com

Postal address: Telepes utca 103, 1147 Budapest, Hungary

18 MANAGING PRIVACY INCIDENTS

In order to prevent and manage data protection incidents and comply with applicable legal requirements, the Operator shall log and continuously analyse and monitor access and access attempts on its information systems.

If the employees of the Operator authorised for inspection in the course of performing their duties detect a data protection incident, they shall immediately inform the Operator's manager.

Employees of the Operator are required to report to their direct superior or to the person exercising the employer's rights if they become aware of a privacy incident.

A privacy incident can be reported to the Operator's email address and telephone number specified in Section 2 above. If a privacy incident is reported, the Operator shall promptly investigate the incident, identifying the incident and deciding whether it is a genuine incident or a false alarm.

In the event of a data protection incident, the Operator shall demarcate, isolate the systems, persons and data concerned and ensure that the evidence supporting the occurrence of the incident are collected and retained, moreover it shall notify the competent authority immediately, but no later than 72 hours after becoming aware of the privacy incident. Thereafter, the Operator shall begin to repair the damage and restore legally compliant operation.

The Operator shall keep a record of privacy incidents, which shall include:

- (i) the scope of Personal Data concerned;
- (ii) the scope and number of persons affected by the data protection incident;
- (iii) time of the data protection incident;
- (iv) circumstances and effects of the data protection incident;
- (v) the measures taken to remedy the privacy incident;

(vi) other data as defined by the law governing the Data Processing.

Records of incidents of data protection incidents shall be retained for 5 years.

19 PRIVACY POLICY OF OTHER WEBSITES

The Website contains links to other websites. Our privacy policy applies only to our Website, so if You click on a link to another website, You should read their privacy policy.

20 CHANGE OF CONTROL

We can also share your Personal Data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys the whole or part of our business will have the right to continue to use your Personal Data, but only in the manner set out in this privacy policy unless You agree otherwise.

21 OTHER PROVISIONS

You may use our Website only as per this privacy policy and permitted by law.

The Operator reserves the right to unilaterally amend this privacy policy at any time. In the event of any change to any of these provisions as a result of the above, we shall publish a modified version of this privacy policy on the Website, so please periodically review the current content of this privacy policy.

If We make material changes, We will provide notice through our Website, or by other means, to provide you the opportunity to review the changes before they become effective.

You acknowledge that your continued use of our Website after We publish or send a notice about our changes to this privacy policy means that the processing, use and transfer of your Personal Data is subject to the updated privacy policy.

If You have any questions about this privacy policy, the Personal Data we hold on You, or You would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: info@rocketshepherd.com

Call us: +36705510170

Effective Date: April 16, 2020