



# Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally identifiable information' (PII) is being used online. PII, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

OrthoGraph Kft., including its affiliates ("OrthoGraph"), collects, stores, and uses your personal information as a data controller in connection with and in order to provide and develop OrthoGraph's products, mobile applications, services and websites (together "Services") according to this privacy policy ("Privacy Policy").

OrthoGraph is committed to ensuring that any personal information and/or company data supplied by our customers or otherwise generated by our business activities is collected and processed fairly and lawfully.

The controller of your personal information and company data is: OrthoGraph Kft., 49 Honvéd utca, Pilisszentlászló, HUNGARY, 2009.

## **1. What personal information do we collect from the people that visit our blog, website or app?**

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address or other details to help you with your experience. Services may collect information about your visit, including the pages you view, the links you click and other actions taken in connection with the Services. Furthermore Services also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring Web site addresses.

## **2. Location Data**

To the extent OrthoGraph makes location enabled Services available and you use such Services, OrthoGraph may collect and process your location data to provide location related Services and advertisements. For example, some add-ons or offers may be available at dedicated locations. The location data is processed and stored only for the duration that is required for the provision of the location related Services.

OrthoGraph may use, depending on the service (1) IP-based location based on the IP address presented by the end-user, (2) fine geo-location data based on coordinates obtained from a mobile device's GPS radio, or (3) coarse, network-based geo-location data based on proximity of network towers or the location of WiFi networks.

Your fine, GPS-based geo-location is not accessed without your consent. Notwithstanding OrthoGraph's partners who are providing location related parts of the Services, OrthoGraph will not share your GPS geo-location with third parties



without your consent. To the extent OrthoGraph makes available GPS geo-location to third parties in accordance with this Privacy Policy, it will be provided anonymously.

### **3. When do we collect information?**

We collect information from you when you register on our site, subscribe to a newsletter, respond to a survey, fill out a form, place an order, use live chat, open a support ticket, provides us feedback on our products or services or enter information on our site or inside our mobile applications.

### **4. How do we use your information?**

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To provide you with legally required, proper, internationally accepted invoices and bills of your purchases
- To personalize user's experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- To quickly process your transactions.
- To ask for ratings and reviews of services or products
- To follow up with them after correspondence (live chat, email or phone inquiries)
- To send periodic emails or notifications (e.g. Push messages) regarding your order or other products and services.

### **5. How do we protect visitor information?**

We do not use vulnerability scanning and/or scanning to PCI standards.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures enters, submits, or accesses their information to maintain the safety of your personal information.

All financial transactions are processed through a gateway provider and are not stored or processed on our servers.



## 6. How long do we store your data?

We store your data as long as you have a valid account. Anytime you ask us to delete your stored data we will process your request as soon as possible, typically within 3 days from your request as:

- If possible then we delete your account and all related data stored on our servers
- If not possible, then we anonymize your data replacing every personal related or identifying information with randomized data ensuring your personal account and any kind of personal data cannot be identified in total and also in its parts.

In both cases all your projects and working data will be discarded from our servers. This also means we will not be able to restore or recover your data and projects if you ask for the deletion of your data.

For requesting the deletion of your personal data you should initiate it

- Either from the e-mail address that is registered to your account
- Or by sending us at least two official documents legally identifying you as Customer.

**Please note:** as legal requirement by the Hungarian law all invoices and information stored on these invoices will be kept for at least 8 years from the date of purchase.

## 7. Do we use 'cookies'?

Yes. The Services may use "cookies" and other technologies such as local shared objects, hardware-based device identifiers, Operating System-based identifiers, web tokens and web beacons. OrthoGraph treats information collected by cookies and similar technologies as non-personal data. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services.

## 8. We use cookies to:

- Help remember and process the items in the shopping cart.
- Understand and save user's preferences for future visits.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies.



## 9. If users disable cookies in their browser:

If you disable cookies off, some features will be disabled. It will turn off some of the features that make your site experience more efficient and some of our services will not function properly.

However, you can still place orders.

Features affected:

- automatic login
- language settings

## 10. Third Party Disclosure and Transfer of Personal Data

Personal data may be disclosed to third parties including third parties located outside the European Union or the European Economic Area in accordance with applicable legislation and this Privacy Policy.

OrthoGraph may store and/or transfer your personal data to its affiliates and partners in and outside of EU/EEA member states and the United States in accordance with mandatory legislation and this Privacy Policy.

OrthoGraph may use third parties to collect and process personal data on OrthoGraph's behalf and in according to OrthoGraph's instructions. OrthoGraph is not liable for the acts and omissions of these third parties, except as provided by mandatory law.

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice and you confirm it with prior approval. We are not responsible for content entered by you or third parties (e.g. other users of the Services) and then shared in the Services for third parties (e.g. Real Estate Data Sheet web functionality of OrthoGraph). We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for operating, marketing, advertising, or other uses.

## 11. Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

## 12. Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>



We have not enabled Google AdSense on our site but we may do so in the future.

### **13. Analytics**

OrthoGraph uses your information to perform its own analytics and to enable analytics provided by third parties. We use analytical information for supporting business analysis and operations, business intelligence, product development, improving products and services, personalizing content, providing advertising, and making recommendations. OrthoGraph may also use third-parties, such as a Flurry or Google Firebase in order to develop and analyze use of the Services. For more information about Flurry and its services please see <http://www.flurry.com/>. For more information about Firebase and its services please visit <https://firebase.google.com/>

### **14. California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. – See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

### **15. According to CalOPPA we agree to the following:**

Users can visit our site anonymously

Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our website.

Our Privacy Policy link includes the word 'Privacy', and can be easily be found on the page specified above.

Users will be notified of any privacy policy changes:

- On our Privacy Policy Page

Users are able to change their personal information:

- By emailing us
- By logging in to their account

### **16. How does our site handle do not track signals?**

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.



## **17. Does our site allow third party behavioral tracking?**

It's also important to note that we allow third party behavioral tracking

## **18. COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13.

## **19. Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

## **20. In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:**

We will notify the users via email

- Within 7 business days

We will notify the users via in site notification

- Within 1 business day

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

## **21. CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:



- Send information, respond to inquiries, and/or other requests or questions
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at

Follow the instructions at the bottom of each email.

and we will promptly remove you from ALL correspondence.

## **22. Contacting Us**

If there are any questions regarding this privacy policy you may contact us using the information below.

<http://support.orthograph.net>

[support@orthograph.net](mailto:support@orthograph.net)