

## Privacy Notice

### - Information on the processing of Users' personal data by the Platform Operator -

Terms, expressions and words starting with capitalized letters within this Privacy Notice shall be interpreted in accordance and together with the Terms and Conditions of Use.

## 1 Controller of your personal data

The data controller of the personal data processed as described below is the Platform Operator, who is:

Name: Neura Korlátolt Felelősségű Társaság (Neura Ltd.)

Registered seat: Tündérlaki mélyút 5 fszt. 3., 1016 Budapest, Hungary

E-mail address: mate.laszlo.nagy@gmail.com

Phone number: +36 20 935 72 01

## 2 Purpose and legal basis of data processing, categories of data and data retention

The Platform Operator is processing the personal data of the User for the following purposes in the course of the operation of the Platform and the provision of the Platform Services:

Purpose	Legal basis	Data categories	Retention period
<b>Registration of a User Account</b> <i>The data processing is necessary to create a User Account on the Platform.</i>	<b>Performance of the contract</b> , according to point b.) of Article 6(1) of the GDPR.	name and contact information  <i>The provision of these data is necessary for the conclusion of the agreement (Terms and Conditions of Use).</i>	For as long as the registration is not deleted by the User or terminated by the Platform Operator
<b>Use of the Platform, provision of the Platform Services</b> <i>The data processing is necessary to enable the use of the features of the Platform and Abilities.</i>	Your <b>consent</b> , according to point a.) of Article 6(1) and in case of special categories of personal data, point a.) of Article 9(2) of the GDPR.	consent, usage data, data provided or generated during the use of the Platform or the Platform Services	Until the User deletes the information, or withdraws consent.
<b>Memory feature (for improved functionality and personalization)</b> <i>The data processing is necessary to enable the "memory" function to store and utilize user data provided and generated during the use of the Platform and the Platform Services.</i>	Your <b>consent</b> , according to point a.) of Article 6(1) and in case of special categories of personal data, point a.) of Article 9(2) of the GDPR.	consent, usage data, data provided or generated during the use of the Platform or the Platform Services	Until the User deletes the information, or turns off the memory feature, or withdraws consent.

- 2.1** If a User deletes their User Account, the personal data processed by the Platform Operator in relation to their User Account will be deleted simultaneously with or without undue delay after the deletion of their User Account. Users may request the Platform Operator to electronically transfer their personal data processed in relation to the User at the time of the deletion of the account before the deletion of their personal data to a recipient designated by the User.
- 2.2** If the User Account is terminated by the Platform Operator, the User may request the electronic transfer of their personal data processed by the Platform Operator at the time of the termination of their User Account to a recipient designated by the User. Such request may be made via the contact channels provided in these Terms for which the User shall use its contact details it has registered the terminated User Account (i.e., their email address, name and/or telephone number). The User's such personal data, including their contact information is retained for a maximum of 30 calendar days following the termination of their User Account to enable the User to make such requests.
- 2.3** The personal data for the purposes listed above are provided either by the data subjects, or generated by or via the Platform, or received from third party sources pursuant to the instructions of the User.

### **3 Data transfer**

- 3.1** The Platform Operator transfers the personal data to the following recipients:

<b>Purpose of the transfer, activity of the recipient party</b>	<b>Recipient</b>
Provision and operation of speech to text, LLM and text to speech models	Data processor: OpenAI Inc., Delaware, USA
Azure cloud service	Data processor: Microsoft Inc., Redmond, USA
Realtime voice and cloud infrastructure	Data Processor: LiveKit Inc., San Jose, California, USA
Further processing of personal data outside of the Platform or the scope of the Platform Services	Various independent third parties, designated by the User

- 3.2** Please note that in addition to the above, in line with the laws applicable to the operation of the Platform, the provision of the Platform Services and the Platform Provider, we may be required to transfer personal data to authorities and courts as prescribed by the relevant laws.
- 3.3** In case you are an EU citizen and your personal data is transferred from the EU to a third country, we ensure that the adequate level of data protection is ensured in line with the requirements set out in the GDPR. In case of recipient parties located in the United States of America, we conclude agreements with them using the Standard Contractual Clauses published by the European Commission, except for companies participating in the EU-U.S. Data Privacy Framework approved by the European Commission by its relevant adequacy decision.

### **4 Your privacy rights**

**4.1** Data subjects may submit inquiries and requests regarding exercising their privacy rights on the Platform's dedicated feature or via email sent to the following email address: [mate.laszlo.nagy@gmail.com](mailto:mate.laszlo.nagy@gmail.com)

**4.2** With any comment, question, complaint and any other request in connection with the processing of Your personal data, we encourage You to contact us directly. We will give a substantive response to your request without delay, but no later than one month after receipt of your request. If the complexity of your request or the number of your requests justifies it, the deadline for replying may be extended by another two months, of which you will be notified by us within the original deadline.

**4.3** You have certain rights in connection with the processing of your personal data (data privacy rights), which might differ regarding each data processing activity. Below you can find a general description of data privacy rights you may be entitled to exercise. Please note that the GDPR and other relevant laws might set further conditions and/or limitations in connection with exercising these rights. Therefore, we advise you to closely study the GDPR and the applicable laws before filing a request. If you need any help in connection with the applicable laws, please get in contact with us.

(a) **Withdrawal of consent** (Article 7(3) of the GDPR)

Provided that a data processing activity is based on your consent, you have the right to withdraw your consent granted for such specific data processing activity any time, free of charge. Please note that the withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

(b) **Access** (Article 15 of the GDPR)

You have the right to request confirmation from the Platform Operator as to whether or not personal data concerning you are being processed, and where that is the case, access to the personal data and certain information determined in Article 15 of the GDPR.

(c) **Rectification** (Article 16 of the GDPR)

You have the right to request the Platform Operator to rectify any inaccurate personal data concerning you without undue delay. Considering the purpose of the processing, you have the right to have the incomplete personal data completed, including by means of providing a supplementary statement.

(d) **Right to erasure** ("right to be forgotten") (Article 17 of the GDPR)

You have the right to request the erasure of your personal data if any of the circumstances set out under Article 17(1) of the GDPR apply. If the exceptions in Article 17(3) of the GDPR do not apply and/or the Platform Operator does not have any legal ground to further process your personal data, then it will execute the request for deletion without undue delay.

(e) **Restriction of processing** (Article 18 of the GDPR)

You have the right to request a restriction on processing where the grounds determined in Article 18 of the GDPR apply.

(f) **Data portability** (Article 20 of the GDPR)

You have the right to receive your personal data provided to the Platform Operator, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Platform Operator if the processing is based on consent [point (a) of Article 6(1) or point (a) of Article 9(2)] or is conducted for the performance of a contract to which you are a party [point (b) of Article 6(1)] and the processing is carried out by automated means. In exercising your right to data portability, you have the

right to have the personal data transmitted directly from one controller to another, where technically feasible.

(g) **Objection** (Article 21 of the GDPR)

If the data processing is based on the legitimate interest of the Platform Operator: You have the right to object (on grounds relating to your particular situation) at any time to the processing of your personal data based on legitimate interest, also including profiling. The Platform Operator will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing, which override your interests, rights and freedoms or if the data processing is necessary for the establishment, assertion or defense of legal claims.

If the purpose of the data processing is direct marketing: You have the right at any time to object (on grounds relating to your particular situation) to the processing of your personal data if the purpose of the data processing is direct marketing, including also profiling if it is related to direct marketing. The Platform Operator will no longer process the personal data if you submit such objection to the processing of your personal data for direct marketing purposes.

**4.4** If you deem that your personal data is processed unlawfully and/or any of your data privacy rights have been violated you are entitled to seek the following legal remedies:

- (a) You have the right to **contact the Platform Operator** via the contact details provided above.
- (b) You have the right to contact directly the national supervisory authority: **Hungarian National Authority for Data Protection and Freedom of Information** (seat: Falk Miksa utca 9-11, 1055 Budapest, Hungary; postal address: 1363 Budapest, Pf.: 9.; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); telephone numbers: on their website; web: [www.naih.hu](http://www.naih.hu))
- (c) You are entitled to **file a claim with Your local court** having jurisdiction in the case, if You deem that your personal data is processed unlawfully and/or any of your data privacy rights have been violated. More information on courts' jurisdiction and contact details is available at the following website: [www.birosag.hu](http://www.birosag.hu).

## **5 Data security**

We employ several technical and organizational measures to ensure an appropriate and high level of data security. Such measures are based on market standards, best practices and recommendations set out in European data protection authorities' guidelines.

Of course, in an ever-changing technological environment it is not possible to ensure absolute protection of personal data, but we aim to ensure the high standard of data protection.

Among many other measures and techniques, we utilize

- protected hardware
- limited access to our premises
- limited access to our IT systems
- protection against viruses and malware
- monitoring and logging of our systems
- development and training of our personnel
- frequent assessment of our preparedness
- data archiving
- disaster recovery protocols
- careful selection of our data processors

