

Privacy Policy

This Privacy Policy (hereinafter as: “**Policy**”) describes how we at HalloInvest PTE. LTD., (seat: 28C Stanley Street Singapore, (068737), registration number: 201827982W, hereinafter as: “**We**” or “**Us**” or “**Our**”) use Our users’ (hereinafter as: “**User**” or “**You**” or “**Your**”) Personal Data during providing our services available at <https://www.goinggris.com> (hereinafter as: “**Site**”).

When using the Site We will manage Your Personal Data in accordance with the legal provisions binding upon Us and in accordance with present Policy.

In the event of any questions in relation to data handling, feel free to contact Us and We will be happy to assist You with regard to any questions.

Definitions and collection of Personal Data

“*personal data*” means 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, which you have provided to us in registration forms, application forms or any other similar forms and/or any information about you that has been or may be collected, stored, used and/or processed by us from time to time. If you are a service provider, we may also collect telematics data (such as your speed, acceleration, and braking data).

„*processing*” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as 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;

“*controller*” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

“*processor*” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

“*consent of the data subject*” means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

„*sensitive data*” means personal data revealing racial origin or nationality, political opinions and any affiliation with political parties, religious or philosophical beliefs or trade-union membership, and personal data concerning sex life, personal data concerning health, pathological addictions, or criminal record;

“*genetic data*” means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question

„*biometric data*” means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data

„*personal data breach*” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

The provision of Your Personal Data is voluntary. However, if you do not provide Us Your Personal Data, We will not be able to process Your Personal Data for the Purposes and Additional Purposes outlined below and may cause Us to be unable to provide services or accept payments from You. We assure that We only process data that is absolutely necessary to provide the services. We inform You that because of the latter reason in the course of processing We do not process any sensitive, genetic or biometric data of Our Users by any means.

Purposes of handling

We may use and handle, process Your Personal Data for business, payment and financial services activities, which shall include, without limitation the following (“**Purposes**”):

Where You are a customer of the services provided by Us:

- to perform Our obligations in respect of any contract entered into with You;
- to provide You with any service You have requested;
- to validate Your requests for services and process payments relating to any services You have requested;
- to understand and analyze Our sales as well as Your needs and preferences;
- to develop, enhance and provide products and services to meet Your needs;
- to use Cookies to enhance Our processes, advertising, notifications, authentication, security and compliance, analytics and preference management.

General:

- to respond to questions, comments and feedback from You;
- to communicate with You for any of the purposes listed in this Policy;
- for internal administrative purposes, such as auditing, data analysis, database records;
- for purposes of detection, prevention and prosecution of crime;
- to maintain the safety and security of Our services;

and You agree and consent to Us using and handling, processing Your Personal Data for the Purposes and in the manner as identified in this Policy.

Details of controller:

Company name: **HalloInvest PTE LTD.**
Registered seat: 28C Stanley Street Singapore, (068737)
Company registration number: 201827982W
Registration Authority: ACRA
Represented by: HalloInvest
E-mail: info@goinggris.com
(hereinafter as: “**Controller**”)

Why and how We collect your Personal Data

Registration

Registration on the Site is free of charge however it is necessary to use the services, without registration You are not able to use Our services. For registration We request Your first and last name, Your e-mail address and We ask you to set a password. After registration We send an e-mail to the given address

with which the registration may be and shall be confirmed. In order to ensure that only You can access to your account, We need to be able to identify you clearly, therefore sending an e-mail after the registration is intended to prevent unauthorized users from creating an account on behalf of You. Our obligation also dictates that We shall not collect other Personal Data from the User for registration other than your first and last name and e-mail address.

After registration within the personal account there is a feature with which You are able to enter and save Your personal data. The data that may be optionally saved are the same which are the following: address and billing address and phone number. We use this information to be able to provide Our services and to communicate with You regarding the service. If there is a problem when providing the service, We use these personal information to contact You.

If You provided Your personal data within the personal account We process the data by Your consent until the consent is withdrawn namely You deleted them within the account. If You withdraw Your consent We immediately delete the data unrecognizably and make them unrecoverable. An exemption from the deletion is when there is an ongoing service in which case the data is still processed after the fulfillment of the order/provision of the service until the expiry of the warranty period regarding the ordered product/service under the title that processing is necessary for the performance of a contract.

The legal ground for processing data in case of voluntarily providing data within the personal account is Your consent and in connection with the performance of the service is the performance of a contract.

Using the Service

After the registration when you start, we may ask further personal data in order to provide you the service which you intend to purchase, or use. If you intend to purchase some of our products we only collect and handle your data such as your name, e-mail address, address in order to meet our legal obligation to issue you an invoice which after successful payment will be sent to the designated e-mail address. Also, in some cases we need to know along with your address your telephone number. This cases is for example when you purchase a printed material from our site, and we need to deliver it to your address and telephone number, to know where your material shall be sent, and how we, or our partner can achieve you if they have further question regarding the delivery. As you know there is possibility to contact us if you have question, or request. With this respect we also need to know your name and e-mail address, firstly to identify you as our user, and secondly to know whom we shall answer. In this context we handle your data in order to perform our contractual obligations, and also for our legal interest, notwithstanding you give the data voluntary. We need to handle your personal data for the purpose of customer services for 8 years, because if arises disagreement between us we need to prove our standpoint. In case of purchasing anything from us we need to handle your data while it is prescribed by the law, in order to enforce your warranty claim. Finally, we need to handle your personal data regarding payment and invoicing issues as long as the relevant law prescribes for us due to taxation issues.

Marketing and promotional purposes

We may also use and process Your data for other purposes (hereinafter as: **“Additional Purposes”**) such as to send you alerts, newsletters, updates, mailers, promotional materials by online messaging service or by email.

The ground for processing e-mail address regarding the Additional Purposes is Your consent which is always asked separately and related to each purpose case by case generally by ticking a checkbox. Because the ground for processing Your e-mail address is Your consent therefore You are entitled to withdraw Your consent by clicking on the *“unsubscribe”* button at the bottom of the e-mail or You may notify Us about such request at the following e-mail address: info@goinggris.com.

Transfer of Personal Data

Your Personal Data may be transferred to, stored, used and processed in a jurisdiction other than Your home nation or otherwise in the country, state and city (hereinafter as: “**Alternate Country**”) in which You are present while using any services provided by Us, to companies which are located outside of Your home nation or Alternate Country and/or where Our servers and/or service providers and partners are located outside of Your home nation or Alternate Country. You understand and consent to the transfer of Your Personal Data out of Your home nation or Alternate Country as described herein.

One example when We transfer Your personal data to an Alternate Country may be when You use the service because the servers where your personal data is stored are outside the territory of Your home country and We have no impact on the decisions made by the server owner where the server houses fiscally are.

Disclosure to Third Parties

Your personal data may be transferred, accessed or disclosed to third parties for the Purposes and Additional Purposes. Further, we may engage other companies, service providers or individuals to perform functions on its behalf, and consequently may provide access or disclose to Your Personal Data to such service providers or third parties. The third parties include, without limitation:

- Carriers;
- Payment providers;
- Information technology (IT) service providers for infrastructure, software and development work;
- Professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- Accountant;
- Governmental authorities to comply with statutory, regulatory and governmental requirements.

Your Personal Data may also be shared in connection with a corporate transaction, such as the formation of a joint venture, a sale of a subsidiary or a division, merger, consolidation, or asset sale, or in the unlikely event of winding-up.

Carriers

As there is a possibility to order printed materials from the Site, and we have no appropriate staff to deliver your order, therefore we need to forward your Personal Data to third parties who will deliver the ordered printed materials to your address. In this case we have to provide your Name, address and telephone number to our sub contracted carriers who will perform the delivery.

Payment

As You may know to register for the service and to create a personal account is free of charge however to provide certain parts of the service (e.g. lectures, video materials, knowledge measuring materials etc.) there is possibility You need to pay a service fee for Us by using a third party payment solution available within the Site through an API.

We use **FINNET Electronic Payment Provider (by Telkom Indonesia)** (company name: PT. Finnet Indonesia, seat: Menara Bidakara 1 Lt. 1 Jl. Jend. Gatot Subroto Kav 71-73 Jakarta 12870,, phone: +62 (021) 829 9999 fax: +62 (021) 828 1999, e-mail: info@finnet-indonesia.com, web: <http://www.finnet-indonesia.com>, represented by: Paulus Djatmiko president of the board of directors, hereinafter as: “**Finnet**”).

We inform You that You not provide Your payment information to Us but directly to Finnet through a built-in software module (plugin or API) on the Site or after redirecting to the payment service provider's site.

Access & Correction Requests and Inquiries, Limiting the Processing of Personal Data

Subject to any exceptions under applicable laws of Your home nation or Alternate Country, You may have different rights regarding the Personal Data. You can make any inquiries regarding Your Personal Data by contacting Us at the following e-mail address: info@goinggris.com.

In respect of Your rights, We have the right to refuse Your requests to access and/or make any correction to Your Personal Data for the reasons permitted under law, such as where the expense of providing access to You is disproportionate to the risks to Your or another person's privacy.

You have the following rights – among others – regarding the process of Your personal data:

right to withdraw consent: the consent given by You to process Your personal data may be withdrawn at any time, however it does not affect legality of the processing made before withdrawal;

access to personal data: You are entitled to get feedback from Us regarding that whether Your data is being processed by Us and furthermore to request information on the facts detailed in the respective legal regulation;

right of rectification: You are entitled to right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning You and also to have incomplete data completed;

right of erasure: You are also entitled to obtain from Us the erasure of personal data concerning You without undue delay and We shall have the obligation to erase personal data without undue delay;

right to restriction of processing: You are also entitled to obtain the restriction of processing;

right to data portability: You are entitled to receive the personal data concerning You, which You have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Duration of processing data and deadline of deletion: By the principles laid down by the law We process Your Personal Data for the shortest possible term, which is equal to the existence of Your registration. In case of Additional Purposes until unsubscribing.

Data protection

Our Site includes physical, electronical and administrative methods and processes in order to ensure the safety and confidentiality of Personal Data for example SSL encryption to protect payments initiated through us. We also use SSL encryption to protect the Personal Data online and take many efforts to keep the data protected in our facilities.

Access to Your personal data is restricted. Only those of our employees gain access to them whose work and tasks needs it.

To protect Our computers and other hardware We rely on a third party. We believe that Our safety protocols are appropriate. E.g.: when You visit one of our Site You gain access to such servers that are located in a safe physical environment in a closed room and which software is protected with firewalls.

Despite We make every effort meeting the industrial standards in order to protect personal data We can not guarantee full protection. 100% effective security unfortunately does not exist neither in online nor offline environment.

Handling of personal data breach

Personal Data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

We report the breach of Personal Data to the competent authority without any causeless delay and if possible within 72 hours after We became aware of a Personal Data breach.

If the Personal Data breach possibly carries high risk regarding the rights and freedoms of natural persons, We also notify the Users about the Personal Data breach without causeless delay.

We are glad to answer Your questions regarding data processing and data protection. For further information regarding data protection Our Users may also contact the competent authority of your home country or Alternate Country.

Cookies

We and third parties with whom We partner, may use cookies, web beacons, tags, scripts, local shared objects such as HTML5 and Flash (sometimes called “flash cookies”), advertising identifiers (including mobile identifiers such as Apple’s IDFA or Google’s Advertising ID) and similar technology (“Cookies”) in connection with Your use of the Site. Cookies may have unique identifiers, and reside, among other places, on Your computer or mobile device, in emails We send to You, and on Our Site. Cookies may transmit information about You and Your use of the services, such as Your browser type, search preferences, IP address, data relating to advertisements that have been displayed to You or that You have clicked on, and the date and time of Your use. Cookies may be persistent or stored only during an individual session.

We may allow third parties to use Cookies on the Site to collect the same type of information for the same purposes We do for ourselves. Third parties may be able to associate the information they collect with other information they have about You from other sources. We do not necessarily have access to or control over the Cookies they use.

Additionally, We may share non-personally identifiable information from or about You with third parties, such as location data, advertising identifiers, or a cryptographic hash of a common account identifier (such as an email address), to facilitate the display of targeted advertising.

If You do not wish for Your Personal Data to be collected via Cookies on the Site, you may deactivate cookies by adjusting Your internet browser settings to disable, block or deactivate cookies, by deleting Your browsing history and clearing the cache from your internet browser. You may also be able to limit our sharing of some of this information through Your mobile device settings.

For the most popular browsers the method of disabling cookies can be found below:

Google Chrome: https://support.google.com/chrome/answer/95647?hl=hu-hu&p=cpn_cookies

Firefox: <https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalnak-tarolnak-szami>

Internet Explorer: <https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>

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

If You do not disable the use of cookies, then You give Your consent to the use and storing of them when browsing Our Site with Your device. If You disable cookies please note that it may cause certain functions be unavailable on the Site and may slow down the performance of the Site.

Links to Third-Party Websites

The Sites may contain links to third parties' websites. Please note that We are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If You provide information directly to such sites, the privacy policy and terms of service on those sites are applicable and We are not responsible for the information processing practices or privacy policies of such sites.

Personal Information from Minors and Other Individuals

As a parent or legal guardian, please do not allow the minor (individuals under 18 (eighteen) years of age) under Your care to submit Personal Data to Us. In the event that such Personal Data is provided, You hereby consent to the processing of the minor's Personal Data and personally accept and agree to be bound by this Policy and take responsibility for his or her actions.

In some circumstances You may have provided personal data relating to other individuals (such as your spouse, family members or friends) and in such circumstances you represent and warrant that You are authorized to provide their personal data to Us and You have obtained their consent for their personal data be processed and used in the manner as set forth in this Policy.

Updating of the data protection guidelines

In case We make any changes or updates in this Policy We communicate this on Our Site to make Our Users up to date regarding the processing, use, publishing and forwarding of personal data. Besides that We also recommend to read through the guideline from time to time to be aware of the possible changes and the actualities of the guideline.

Present Policy may be available in several languages, if there is any discrepancy between the texts the English version shall prevail.