

Privacy Policy

This document provides information on data processing on the websites of Bard Solutions Kft, as the data controller (hereinafter referred to as the Data Controller), at <https://bardtest.gg/> and <https://online.bardtest.gg/>.

1. Purpose of this Document

The Data Controller processes the personal data of users of the website services (hereinafter referred to as Data Subjects) in accordance with Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as Infotv.), as well as the Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter referred to as GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

The Data Controller informs the Data Subjects about the personal data it processes, the purposes of the data processing, the duration of data storage, the manner of data storage and transmission, the principles and practices followed in the processing of personal data, and the ways and possibilities for exercising the rights of the Data Subjects.

The Data Controller reserves the right to unilaterally amend this document at any time.

2. The Data Controller

The personal data controller is Bard Solutions Kft,
Headquarters: 1138 Budapest, Dunavirág utca 2-6, 1st tower, 5th floor.
Company registration number: 01 09 412643
Contact for data protection: hello@bardtest.gg

3. Data Processing by the Data Controller on the Website

3.1. Personal Data Processed During Registration

Using the website requires registration.

Purpose of data processing: To identify customers and authorize their login.

Source of data: The personal data is always provided directly by the Data Subject during registration or via a third-party service (e.g., logging in with Facebook or Google account details using the connect feature).

Facebook-Connect is a service provided by Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, D2 Dublin), which allows users to log into the website via their Facebook registration without needing to register separately for the application. In this case, the user's Facebook profile and the application are linked. Through the connection of these

two services, the application automatically receives the data that the user has approved for transfer from Facebook (e.g., first name, last name, email address, profile picture, gender, list of friends). This data is used to identify the user when logging into the application. Information regarding the Facebook-Connect service and privacy settings can be found at the following link: www.facebook.com/about/privacy.

Google Sign-In shares the user's name, email address, and profile picture with the Data Controller. More information on Google connect can be found here:

<https://support.google.com/accounts/answer/10130420#siwg&zipy=%2Chogyan-történika-z-adato-k-megosztása>

Mandatory data provision: Yes

Legal basis for data processing: GDPR Article 6(1)(b), necessary for the performance of a contract to which the Data Subject is a party.

Processed data: Username, email address

Data retention period: Until profile deletion

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller.

Data storage method: Electronic.

Data transmission: No transmission of data involved in this data processing.

Data processors involved in data processing:

Data Processor	Which personal data does it have access to?	How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can it store the data?
AB Consulting Group Zrt, 1138 Budapest, Dunavirág utca 2-6 1st tower, 5th floor	The personal data provided on our website	Our website hosting provider, providing the necessary storage space for the personal data provided there	As long as our contract with them is active

3.2. Personal Data Processed After Registration, During Profile Completion

Purpose of data processing: To facilitate communication with the user (e.g., addressing them by name in emails, offering personalized discounts on birthdays) and for statistical purposes (country) to see where users register from.

Source of data: Provided by the Data Subject.

Mandatory data provision: Yes

Legal basis for data processing: GDPR Article 6(1)(a), the Data Subject has given consent to the processing of personal data for one or more specific purposes. Consent is given by checking the appropriate box before saving the profile data.

Processed data: Last name, first name, date of birth, country

Data retention period: Until profile deletion

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller.

Data storage method: Electronic.

Data transmission: NONE.

Data processors involved in data processing:

Data Processor	Which personal data does it have access to?	How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can it store the data?
AB Consulting Group Zrt, 1138 Budapest, Dunavirág utca 2-6 1st tower, 5th floor	The personal data provided on our website	Our website hosting provider, providing the necessary storage space for the personal data provided there	As long as our contract with them is active

3.3. Personal Data Processed During Player Profile Completion

Purpose of data processing: Collecting statistical information.

Source of data: Provided by the Data Subject.

Mandatory data provision: No

Legal basis for data processing: GDPR Article 6(1)(a), the Data Subject has given consent to the processing of personal data for one or more specific purposes. Consent is given by checking the appropriate box before saving the profile data.

Processed data:

Demographics:

Gender

How often do you engage in physical activity?

Age

What kind of settlement do you live in?

Gaming habits:

How often do you play?

Which 3 games do you have the most hours played in?

Do you have competitive experience?

What platforms do you play on?

Personality:

Are you generally satisfied with your performance?

Are you generally satisfied with your stress tolerance?

Do you like trying new games?

Do you usually lead your team?

Hardware-related questions:

What monitor do you use?

What mouse do you use?

What keyboard do you use?

How fast is your internet connection? mbps/mbps

Data retention period: Until profile deletion

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller.

Data storage method: Electronic.

Data transmission: Collected personal data is used for statistical purposes and anonymized, meaning it cannot be traced back to the user, for statistical analysis and reports.

Data processors involved in data processing:

Data Processor	Which personal data does it have access to?	How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can it store the data?
AB Consulting Group Zrt, 1138 Budapest, Dunavirág utca 2-6 1st tower, 5th floor	The personal data provided on our website	Our website hosting provider, providing the necessary storage space for the personal data provided there	As long as our contract with them is active

3.4. Personal Data Processed During Player Competency Assessment

Our website is created for e-sport enthusiasts to assess their skills through tests specifically designed for this purpose, compare their results with others, and identify areas for improvement.

Purpose of data processing: Measuring the e-sport competencies of the Data Subjects.

Source of data: Provided by the Data Subject, generated during the completion of tests and tasks on the website.

Mandatory data provision: Yes

Legal basis for data processing: GDPR Article 6(1)(b), necessary for the performance of a contract to which the Data Subject is a party.

Processed data: Perception, Fine motor skills, Quick decision-making, Reaction time, Eye-hand coordination, Judgment, Multitasking, Logical thinking.

Data retention period: Until profile deletion

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller.

Data storage method: Electronic.

Data transmission: Generally not applicable, but personal data of players using voucher codes will be transmitted to the Hungarian E-sport Association (Address: 1135 Budapest, Szegedi út 37-39., Tax number: 18943777-2-41, Registration number: 01-02-0016706).

Data processors involved in data processing:

Data Processor	Which personal data does it have access to?	How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can it store the data?
AB Consulting Group Zrt, 1138 Budapest, Dunavirág utca 2-6 1st tower, 5th floor	The personal data provided on our website	Our website hosting provider, providing the necessary storage space for the personal data provided there	As long as our contract with them is active

3.5. Personal Data Processed During Payment and Billing

Purpose of data processing: Fulfillment of accounting obligations

Legal basis for data processing: GDPR Article 6(1)(c), necessary for compliance with a legal obligation to which the data controller is subject

Processed data: Name, billing address, and email address for the delivery of online invoices

Data retention period: 8 years following the issuance of the invoice, according to Act C of 2000 on Accounting, Section 169 (1)

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller

Data storage method: Electronic

Data transmission: During card payment, you will be redirected from our website to the secure payment page of Stripe (Stripe Payments Europe, Ltd. The One Building, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland dpo@stripe.com).

The payment is processed directly on the page operated by Stripe, in accordance with the rules and security requirements of international card organizations. Upon redirection, the Data Controller provides the following data to Stripe Payments Europe, Ltd.: last name; first name; country; phone number; email address.

The purpose of data transmission is to provide customer service assistance, confirm transactions, and protect users. Please note that for data provided on the Stripe payment page, Stripe Payments Europe, Ltd. is considered an independent data controller.

Data you provide in the Stripe system for successful payment includes:

- Credit card number;
- Name of the credit card holder;
- Credit card expiration date;
- CVC/CVV code associated with the credit card, which you provide in a closed system for security purposes to ensure successful payment.

Stripe's current privacy policy is available at the following link:

<https://stripe.com/enhu/legal/privacy-center>

Data processors involved in payment and billing:

Data Processor	Which personal data does it have access to?	How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can it store the data?
Google Workspace, Gordon House, Barrow Street, Dublin 4, Ireland	The personal data related to our email system infrastructure	Our email system infrastructure provider	As long as our contract with them is active
Billingo Technologies Zrt., 1133 Budapest, Árbóc utca 6. I. emelet	Personal data on the invoices	Has access to personal data on the invoices	As long as our contract with them is active
Répássy Enikő individual entrepreneur, 1131 Budapest, Madarász V. u. 13/C	Personal data on the invoices	Our accounting service partner, who can view personal data on the invoices during accounting processes	As long as our contract with them is active

3.6. Personal Data Processed During the Use of Voucher Codes

Users can redeem voucher codes received from our partners on our website to receive various discounts, and by redeeming the voucher code, they make the competency assessment data achieved on the website accessible to our partners.

Purpose of data processing: Providing discounts and sharing data with the third party providing the voucher
Legal basis for data processing: GDPR Article 6(1)(a), the Data Subject has given consent to the processing of personal data for one or more specific purposes. Consent is given by redeeming the voucher.

Processed data: Perception, Fine motor skills, Quick decision-making, Reaction time, Eye-hand coordination, Judgment, Multitasking, Logical thinking

Data retention period: Until the user’s profile is deleted

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller
Data storage method: Electronic

Data transmission: Personal data is transmitted to the Hungarian E-sport Association (Address: 1135 Budapest, Szegedi út 37-39., Tax number: 18943777-2-41, Registration number: 01-02-0016706)

Data processors involved in voucher code data processing:

Data Processor	Which personal data does it have access to?	How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can store the data?
AB Consulting Group Zrt, 1138 Budapest, Dunavirág utca 2-6 1st tower, 5th floor	The personal data provided on our website	Our website hosting provider, providing the necessary storage space for the personal data provided there	As long as our contract with them is active

3.7. Personal Data Processed During Contact and General Inquiries

The Data Controller can be contacted through any communication channel, and handling certain personal data of interested customers is essential for providing responses.

Purpose of data processing: Responding to inquiries from interested parties

Legal basis for data processing: GDPR Article 6(1)(b), necessary for the performance of a contract to which the Data Subject is a party, or for taking steps at the request of the Data Subject prior to entering into a contract. Our company considers communication as preliminary data processing related to a future contract (subscription, registration), or data processing related to an already concluded contract.

Processed data: Name and contact information necessary for providing a response (email address), and any other personal data provided by the customer, such as a phone number.
Data retention period: If any kind of contract or agreement is concluded between our company and you, the personal data provided during communication will be processed in relation to that contract, up to the expiration of the limitation period. If no contract or agreement is concluded following preliminary data processing, the messages will be deleted after the conclusion of communication.

Data processing location: At the Data Controller's premises and IT equipment used by data processors engaged by the Data Controller

Data storage method: Electronic

Data transmission: No transmission of data involved in this data processing.

Data processors involved in contact and appointment scheduling:

Data Processor	Which personal data does it have access to? How can it use the personal data (what activities does it perform for the Data Controller)?	For how long can it store the data?
Google Workspace Gordon House, Barrow Street, Dublin 4, Ireland	Provider of our email system infrastructure	As long as our contract with them is active
Tárhely.Eu Kft. 1144 Budapest, Ormánság utca 4. X. emelet 241. Tax number: 14571332-2-42	Our website hosting provider, providing the necessary storage space for the personal data provided there	As long as our contract with them is active

3.8. Cookies

When certain parts of the website are downloaded, the web server automatically places small data files, known as cookies ("Cookies"), on the User's Device and reads them back during subsequent visits. In some cases, these data files may be considered personal data under Infotv. and GDPR, as the browser sends back a previously saved cookie, allowing the service provider to link the current visit of the User with previous ones, but only regarding their own content.

The website places cookies on the user's device for the following purposes during use:

- **Essential cookies**, placed by the webshop to identify the user's session. If you do not allow any cookies in your browser, you will not be able to use the webshop application or only with limitations. Therefore, these cookies do not require the user's consent.
- **The Data Controller uses Google Analytics for statistical data collection**, which places cookies in your browser and sends data to the Data Controller about what you visited on the site. These cookies do not store personal data and are used to track user activity on the site. These cookies are placed based on the user's consent, given by clicking the "Agree" button in the popup window. If you do not want to participate in data collection by Google Analytics, you can reject it by not allowing the installation of these cookies in your browser.
- **Functional cookies** help perform certain functions, such as sharing website content on social media platforms, collecting feedback, and other third-party features. These cookies are placed based on the user's consent, given by clicking the "Agree" button in the popup window. If you do not want to allow functional data collection, you can reject it by not allowing the installation of these cookies in your browser.
- **Performance cookies** are used to understand and analyze key performance indicators of the website, contributing to a better user experience for visitors. These cookies are placed based on the user's consent, given by clicking the "Agree" button in the popup window. If you do not want to allow data processing by performance cookies, you can reject it by not allowing the installation of these cookies in your browser.
- **Advertising cookies** are used to deliver personalized advertisements to visitors based on previously visited pages and to analyze the effectiveness of advertising campaigns. These cookies are placed based on the user's consent, given by clicking the "Agree" button in the popup window. If you do not want to allow data processing by advertising cookies, you can reject it by not allowing the installation of these cookies in your browser.

Cookie Name	Owner	Collects Personal Data?	Purpose	Data Retention Period
_ga	Google	No	Statistical	One year
sbjs_migrations	Sourcebuster	No	Session	Session
sbjs_current_add	Sourcebuster	No	Session	Session
sbjs_first_add	Sourcebuster	No	Session	Session
sbjs_current	Sourcebuster	No	Session	Session
sbjs_first	Sourcebuster	No	Session	Session
sbjs_udata	Sourcebuster	No	Session	30 minutes
_tt_enable_cookie	TikTok	No	Marketing	One year
_ttp	TikTok	No	Marketing	Session
_fbp	Facebook	No	Marketing	Three months
clwxx0h3j00asaioi29503ycl	WordPress	No	Statistical	Session
clwxx0h3s00auaioi73cig04r	WordPress	No	Statistical	Session
_hjSessionUser_3738729	WordPress	No	Statistical	Session
adonis-session	WordPress	No	Operational	Session
_ga_CYEQGPX9LJ	Google	No	Statistical	Session
clwxx8c4u00avaioihxx3852m	WordPress	No	Operational	Session

Purpose of Data Processing: Identification and differentiation of users, session identification.

Legal Basis for Data Processing: Legitimate interest for essential cookies, consent for other cookies.

Data Processed: Identifier, date, time.

Data Storage Method: Electronic.

Data Transfer: For cookies installed by third parties, data is transferred to the third party.

4. Data Security

The Data Controller respects the regulations regarding the security of personal data and takes all necessary technical and organizational measures, and establishes the procedural rules required to enforce the confidentiality and security rules of Infotv. and GDPR. The Data Controller protects the data it processes against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as against accidental destruction or damage.

The Data Controller maintains:

- a) **Confidentiality:** protects the information so that only those authorized can access it;
- b) **Integrity:** protects the accuracy and completeness of the information and the processing method;
- c) **Availability:** ensures that the authorized user can access the information when needed, and the related tools are available.

The Data Controller protects its IT systems and networks against computer fraud, espionage, fire and flood, viruses, and computer break-ins. The operator ensures security with server-level and application-level protection procedures. The Data Controller monitors its systems to record any security incidents and provide evidence of all security events. System monitoring also allows the effectiveness of the applied precautionary measures to be checked. The Data Controller requires and monitors compliance with the information protection measures it employs, based on the provisions of the contracts with the data processors it engages.

5. Rights of Data Subjects and Enforcement

All personal information provided by the Data Subject to the Data Controller must be true, complete, and accurate in all respects.

The data subject may request information about the processing of their personal data and may request the correction or, except for mandatory data processing, the deletion or withdrawal of their personal data, and may exercise their right to data portability and objection as indicated at the time of data collection or via the contact details provided above.

Right to Information: The Data Controller takes appropriate measures to provide the data subjects with all information regarding the processing of personal data in a concise, transparent, understandable, and easily accessible form, clearly and comprehensibly, as mentioned in Articles 13 and 14 of the GDPR and all information pursuant to Articles 15 to 22 and 34. The right to information can be exercised in writing via the contact details provided in section 2 of this notice. Information may also be provided orally upon request, following the verification of the data subject's identity.

Right of Access: The data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning them is being processed and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; the envisaged period for which the personal data will be stored; the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or object to such processing; the right to lodge a complaint with a supervisory authority; information as to the source of the data; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data is transferred to a third country or international organization, the data subject has the right to be informed of the appropriate safeguards relating to the transfer.

The Data Controller provides a copy of the personal data undergoing processing to the data subject. For any further copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, the information shall be provided in a commonly used electronic form. The data controller shall respond to the request without undue delay and at the latest within one month of receipt of the request.

Right to Rectification: The data subject has the right to obtain from the data controller without undue delay the rectification of inaccurate personal data concerning them and the right to have incomplete personal data completed.

Right to Erasure: The data subject has the right to obtain from the data controller the erasure of personal data concerning them without undue delay where one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- The data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- The personal data have been unlawfully processed;
- The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;

The personal data have been collected in relation to the offer of information society services.

Erasure of data cannot be initiated if processing is necessary:

- For exercising the right of freedom of expression and information;
- For compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- For reasons of public interest in the area of public health;
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- For the establishment, exercise, or defense of legal claims.

Right to Restriction of Processing: The data subject has the right to obtain from the data controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- The data controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims;

The data subject has objected to processing pending the verification of whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The data controller shall inform the data subject who has obtained restriction of processing before the restriction is lifted.

Right to Data Portability: The data subject has the right to receive the personal data concerning them, which they have provided to a data controller, in a structured, commonly used, and machine-readable format, and have the right to transmit those data to another controller without hindrance from the data controller to which the personal data have been provided.

Right to Object: The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. The data controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Automated Decision-Making in Individual Cases, Including Profiling: The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

This right does not apply if the processing:

- Is necessary for entering into or performing a contract between the data subject and the data controller;
- Is authorized by Union or Member State law to which the data controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or Is based on the data subject's explicit consent.

Right to Withdraw Consent: The data subject has the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Procedural Rules: The data controller shall inform the data subject without undue delay, and in any event within one month of receipt of the request, about the actions taken in response to a request under Articles 15 to 22 of the GDPR. This period may be extended by two further months where necessary, taking into account the complexity and number of requests. The data controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. If the data subject makes the request by electronic means, the information shall be provided by electronic means where possible unless otherwise requested by the data subject.

If the data controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of

the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Data Controller provides the requested information and action free of charge. If the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive character, the data controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on the request. The data controller shall inform all recipients to whom the personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out unless this proves impossible or involves disproportionate effort. The data controller shall inform the data subject about those recipients if the data subject requests it.

The data controller provides a copy of the personal data undergoing processing to the data subject. For any further copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs. If the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Right to Compensation and Damages: Any person who has suffered material or non-material damage as a result of an infringement of the GDPR has the right to receive compensation from the data controller or data processor for the damage suffered. A data processor shall be liable for the damage caused by processing only where it has not complied with obligations of the GDPR specifically directed to processors or where it has acted outside or contrary to lawful instructions of the data controller.

Where more than one data controller or data processor, or both a data controller and a data processor, are involved in the same processing and where they are responsible for any damage caused by processing, each data controller or data processor shall be held liable for the entire damage.

A data controller or data processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

Complaint to the Supervisory Authority: The data subject has the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information regarding the processing of their personal data.

Name: National Authority for Data Protection and Freedom of Information

Headquarters: 1055 Budapest, Falk Miksa utca 9-11

Mailing Address: 1363 Budapest, Pf.: 9.

Email: ugyfelszolgalat@naih.hu

Website: <https://www.naih.hu>

Right to Court: The data subject has the right to seek judicial remedy if their rights under the GDPR are infringed. The court shall handle the case out of turn.