

FOR DRFACTOR LLC, TO THE DR-FACTOR.COM PAGE AND APP SERVICE
DATA PROTECTION AND DATA SHEET INFORMATION
PURPOSE AND SCOPE OF THE PRESENT INFORMATION BULLETIN

I.

The purpose of this Prospectus is to register with Drfactor LLC. (hereinafter referred to as Data Manager), as well as its privacy and management policy, which is compulsory for the data controller as a data controller.

This Prospectus contains the principles of managing the Personal Data provided by the Users on the operator's websites.

In setting out the provisions of the Prospectus, the operator has taken particular account of the provisions of the European Parliament and Council Regulation 2016/679 ("General Data Protection Regulation" or "GDPR"), Act CXII of 2011 on Information Freedom of Information and Freedom of Information. ("Infotv."), Act V of 2013 on the Civil Code ("Act"), and Act XLVIII of 2008 on the Fundamental Terms and Limitations of Commercial Advertising Activity. ("Grtv.").

In the absence of any other information, the Prospectus does not extend to the services and data processing provided by any of the websites referred to in this Prospectus or on other websites, promotions, prize games, services, other campaigns, and content that they publish to third parties other than the Data Controller. Likewise, in the absence of any other information, the scope of this Prospectus does not extend to the services and data management of websites, service providers that are referred to on the websites covered by this Prospectus. Such services are governed by the provisions contained in the Third Party Privacy Information Provider of the Service and for these data management the Data Manager does not assume any liability.

II. Concept Definitions

2.1 Data management: irrespective of the method used, any operation or operation of any personal data, such as the collection, capture, systematization, tagging, storage, transformation, alteration, use, retrieval, access, use, communication, transmission and dissemination of Personal Data or otherwise made available, disclosed, aligned or linked, restricted, deleted, or destroyed.

2.2 Data Manager: who determines the purposes and tools of Data Management, independently or with others. DRFACTOR LLC. (906 W 2ND AVE STE 100, SPOKANE, WA. US 99201)

For the Services referred to in this Prospectus, you are considered a Data Administrator DRFACTOR LLC. (906 W 2ND AVE STE 100, SPOKANE, WA. US 99201)

2.3 Personal Data or Data: any data or information that allows a natural person to be identified, directly or indirectly, by the user.

2.4 Data Processor: a service provider who manages personal data on behalf of the Data Manager. For services included in this Prospectus, Data Processors may be:

- - Fakturownia Sp. Z o.o. Juliana Smulikowskiego 6/8 00-389 Warszawa, Poland VAT ID PL5213704420, online invoicing (invoiceocean.com)
- - Videotex Bt. 2310 Szigetszentmiklós Recreational Line 195 A. 28181910-1-13, marketing activities, IT services, operator tasks

- - c / o The Rocket Science Group, LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta GA 30308 US EIN 58-2554149, Send Automated and Mailing Emails (mailchimp.com)
- - Contabo GmbH, Aschauer Straße 32a, 81549 Munich, Germany server service (contabo.com)
- - Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Deutschland, Server (hetzner.com)

2.5 Service (s): Free or reimbursable services available at dr-factor.com are available to users after registration.

2.6 User is the natural person who registers on the dr-factor.com website, and in this context gives you the following III.

2.7 External service provider: third party service partners, whether directly or indirectly, connected to the provision of certain Services, for whom Personal Data may be transferred or may be transferred or personal data to the Data Controller data can be transmitted. In addition, when the hosting service is provided, the Data Controller also considers the User to be an External Provider for the data management activity in the storage space it uses.

2.8 Information: Data Handler's prospectus for this Privacy Policy.

III. The scope of the Personal Data Handled

3.1 If the User visits the website of dr-factor.com, the Data Management System automatically records the user's IP address.

3.2 At the discretion of the User, the Data Handler can manage the following data related to the use of the Services:

At registration, you must enter: e-mail address, name

Next after the first purchase: Phone number, Exact address (country, city, postal code, street, floor, door)

In addition, the User may provide additional information on a voluntary basis: interest, introduction.

3.3 If the User sends an e-mail for the purpose of dr-factor.com, the recipient's e-mail address will be stored by the Data Management System, but only for the sender of the invitation, for information purposes. No mail will be sent to these email addresses later than the Data Management System and will not be handed over to third parties.

3.4 If, at the User's own discretion, you link your Facebook account to dr-factor.com, the Data Manager may, in addition to the aforementioned, manage the following Personal Information of the User: Facebook Profile Name, Facebook Profile URL, Facebook Profile ID, Facebook Profile Image, mail address.

3.5 Regardless of the foregoing, it may occur that a service technically connected to the operation of the Services is engaged in data management activities without informing the Data Operator. Such activity is not considered Data Management by Data Manager.

The Data Handler will do its utmost to prevent and block such data processing.

IV. The scope of additional data managed by the Data Manager

4.1 The Data Manager places a small data packet (so-called "cookie") on the user's computer for tailor-made service. The purpose of the cookie is to ensure that the site

operates at the highest level, to provide personalized services and to increase the user experience. The user can delete the cookie from your computer or set up your browser to disable cookies. By prohibiting the use of cookies, the User acknowledges that without the cookie, the operation of the site is incomplete. In this case, the Data Manager does not take any responsibility for the lost data.

4.2 The Data Manager manages personal data by using cookies by providing personalized services: interest information, habits, preferences (based on browsing history).

4.3 Technically recordable data during the operation of the systems: the data of the user's logged in computer generated during the use of the Service and recorded by the Data Management System as an automatic result of the technical processes. The information that is automatically recorded will be logged automatically upon logging in or exiting without the user's specific statement or action.

V. The purpose and the legal basis of Data Management

5.1 The purpose of data management by the Data Controller is to:

- (a) identification of the User, contact with the User
- (b) to allow or prohibit access to services on dr-factor.com.
- (c) managing and managing unique user requests;
- (d) production of statistics and analyzes;
- (e) direct marketing or marketing inquiries (eg. newsletters, eDMs, etc.)
- (f) Providing hosting for content-generated content (introduction, uploaded videos, pictures);
- (g) Ensuring the identification of users by means of community services (chat, messaging), allowing them to communicate with each other;
- (h) Organizing, conducting, organizing and organizing prize games, awarding prizes and winning prizes;
- (i) in the case of a webshop service, the creation of a contract between the parties, the definition, modification, monitoring of their performance, the delivery of the ordered product and the use of the ordered service, the invoicing of the purchase price and related claims, ;
- (j) technical development of the IT system;
- (k) the Protection of Users' Rights;
- (l) Validating the legitimate interests of the Data Controller. The Data Handler does not use the Personal Data provided for purposes other than those stated in these points.

5.2 Data Management shall be based on a voluntary, informative Declaration of Users which shall contain the express consent of the Users to use their Personal Data and the Personal Data generated by them during the use of the Site. The User is entitled to revoke his consent at any time in the case of consent-based data handling, which, however, does not affect the lawfulness of the pre-revocation of data handling.

The Data Handler enters the User's dr-factor.com IP address in connection with the provision of the Service, in connection with the legitimate interest of the Data Controller and on the lawful provision of the Service (eg for the purpose of eliminating unlawful use or unlawful content), without the User's separate consent

5.3 Transmission of data to Data Processors as defined in this Prospectus may be made without the user's own consent. Issuance of personal data to a third party or

authorities may, unless otherwise provided by law, be made solely on the basis of a final authority decision or in the prior express consent of the User.

5.4 The User warrants that the natural person concerned has legitimately obtained the consent of the natural person concerned when handling the personal data that he or she has made available or made available to other natural persons when using the Services (eg, when publishing the User-generated content, etc.). All responsibility for the shared user content uploaded by the User to the Services is borne by the User.

5.5 When giving any user's e-mail address and registration information (such as user name, ID, password, etc.), you are also responsible for entering the e-mail address or email address you entered. using the information provided by him only uses the service. With respect to this responsibility, any liability associated with any given access to a given e-mail address and / or data shall be borne exclusively by the User who has registered the e-mail address and entered the data.

VI. Principles and Methods of Data Management

6.1 The Data Controller manages the Personal Data in accordance with the principles of good faith and fairness and transparency, as well as the applicable legislation and this Prospectus.

6.2 The Personal Data is indispensable for the use of the Services by the Data Handler on the basis of the consent of the User concerned and solely on purpose.

6.3 The Data Controller shall only disclose Personal Data in this Prospectus or in this Prospectus. for the purposes specified in the relevant legislation. The scope of the Personal Data handled is proportionate to the purpose of data management and can not be expanded.

In all cases where the Personal Data is intended to be used by the Data Controller for purposes other than the purpose of the original recording, he / she shall inform the User of this and obtain his or her prior express consent or give him the opportunity to prohibit the use.

6.4 The Data Manager does not control the Personal Data you have entered. Only the person who gave it will be responsible for the compliance of the provided Personal Data.

6.5 The Data Controller shall transfer the Personal Data that it manages to the Data Processors specified in this Prospectus and, in some cases referred to in this Prospectus, to third parties other than External Providers.

In certain cases, the Data Controller violates the Data Manager's interests, endangers the provision of Services, etc. In cases of official court, police inquiries, legal proceedings against copyright, property or other breaches or their reasonable doubts - make available to the third parties the Personal Data available to the User concerned.

6.6 The Data Management System collects data on the Activity of Users that can not be combined with other data provided by Users during registration, nor with any other data generated by the use of other websites or services.

6.7 The Data Handler is responsible for correcting, limiting or limiting the Personal Data it manages. deletes the affected User and informs those who previously transferred Personal Data for Data Management. Notification may be omitted if it does not prejudice the legitimate interest of the data concerned for the purposes of Data Management.

6.8 The Data Controller shall ensure the security of Personal Data, take the technical and organizational measures and establish the procedural rules that ensure that the recorded, stored or managed data is protected or preventing accidental loss,

unauthorized destruction or unauthorized access , unauthorized use and unauthorized alteration or unauthorized disclosure. In order to comply with this obligation, the Data Controller invites all third parties to whom Personal Data is transmitted.

6.9 Subject to the relevant provisions of the GDPR, the Data Controller is not required to appoint a Data Protection Officer.

VII. The duration of the Data Handling

7.1. Automatically recorded IP addresses are stored by the Data Manager for up to 12 months after recording.

7.2 In the case of invitations sent by the User, the invited e-mail address is stored until the user or the person invited to cancel it.

7.3 The User-defined Personal Data Management shall be maintained until the User requests deletion. In this case, the Personal Data will be deleted from the Data Management System. Once the Personal Data has been deleted, the User will no longer be able to access the services provided by the dr-factor.com website at the same time as the user account will be terminated.

7.4 Unlawful, misleading In the event of the use of personal data or in the event of an offense or system attack by the User, the Data Controller shall be entitled to delete his / her personal data at the same time as the User's registration is terminated. However, in the event of suspicion of a criminal offense or civil liability, for the duration of the procedure.

7.5 Data that is automatically recorded during operation of the system will be stored in the system for a reasonable period of time from the time they are generated to ensure the system's operation. The Data Controller ensures that these automatically recorded data can not be linked to other Personal Data, except in cases that are legally binding. If you have requested the deletion of the User's Personal Data, then the technical data will not be identified without their personal investigators or experts.

7.6 In the event that a court or authority has ordered the deletion of Personal Data definitively, the deletion will be executed by the Data Controller. Instead of deleting, the Data Handler restricts the use of Personal Data, while informing the User, if the User so requests or if, based on the information available to him, it may be assumed that deletion would undermine the legitimate interest of the User. The Personal Data shall not be cleared by the Data Manager until such time as the Data Management Purpose is excluded that excludes the deletion of Personal Data.

VIII. Rights of the User and their Validation

8.1 The User may request that the Data Controller informs him that he or she manages the User's personal data and, if so, has access to the Personal Data he or she manages. The Personal Data provided by the User can be viewed and modified by the profile data in the user's account.

Regardless of this, you may be able to request information from the User's Personal Data Management by email, by registered mail or by e-mail sent to info@dr-factor.com, in writing to the Data Manager address. The information request sent by letter is considered by the Data Manager as authentic if the User is clearly identifiable on the basis of the request sent. By requesting a request for information by e-mail, the Data Manager will only consider it authenticated if it is sent by the User from a registered

email address but this does not preclude the Data Manager from identifying the User before providing the information.

The request for information may cover the data of the User managed by the Data Controller, their source, the purpose, the legal basis, the duration of the Data Processing, any Data Processor's names and addresses, the Data Management related activities and, in the case of the transmission of Personal Data, who and for what purpose and user information.

8.2 The User may at any time modify his / her data on the website, entering his / her own account. However, after the change, data prior to the modification can not be recovered.

8.3 The User may request the deletion of the Personal Data handled by the Data Controller. Cancellation may be refused (1) for the purpose of exercising the right to freedom of expression and access to information, or (2) if the law governing the processing of Personal Data is authorized; and (3) submitting, enforcing, or protecting legal claims.

In any case, the Data Handler informs the User of the denial of the cancellation request, indicating the reason for the cancellation of the cancellation. After the request for deletion of personal data, previous (deleted) data can no longer be recovered.

You can unsubscribe from newsletters sent by the Data Manager at any time by clicking on the link in the letter. In case of unsubscribe, the data manager will delete the user's personal data in the newsletter database. You can subscribe to System Accounts by email in your account.

8.4 The User may request that his or her personal data is handled by the Data Controller if the User disputes the accuracy of the Personal Data Handled. In this case, the restriction refers to the time period that the Data Controller may check for the accuracy of Personal Data. The Data Controller denotes the Personal Data it manages if the User disputes its accuracy or accuracy, but the incorrect or imprecise nature of the disputed Personal Data can not be ascertained clearly.

The User may request that his or her personal data is handled by the Data Controller even if Data Management is illegal, but the User opposes the deletion of the treated Personal Data and instead asks for their use limitation.

The User may also request that the processing of his Personal Data is restricted by the Data Controller if the purpose of the Data Management is achieved but the User requests their Data Management to handle, enforce, or protect legal claims.

At the same time suspending data management, the account associated with the User is suspended.

8.5 The User may request that the Data Handler hand over and / or transfer the Personal Data handled by the User to the Machine and processed by the User in an automated manner in a machine-readable, widely used machine-readable format.

8.6 You may object to the handling of your Personal Data (1) if the processing of Personal Data is only required to fulfill the legal obligation of the Data Manager or to enforce the legitimate interests of the Data Controller, any Service Operator or third party; (2) if the purpose of Data Processing is to direct business acquisition, polling or scientific research; or (3) if Data Management is performed in the interest of a public interest task. The Data Controller examines the legitimacy of the User's protest and, if it establishes the validity of the protest, terminates the Data Management and retains the Personal Data processed, and notifies the protest and any action taken against it for any person for whom the Personal Data affected by the protest was previously forwarded.

IX. Data processing

9.1 For the purpose of performing the activities of the Data Controller, the Data Processors mentioned above in this Prospectus shall use the above mentioned Data Processors.

9.2 Data processors will not make a stand-alone decision, they will only be entitled to proceed with the contract with the Data Manager and the instructions received.

9.3 The Data Controller checks the work of Data Processors.

9.4 They are entitled to further consent by the Data Processors.

X. External service providers

10.1 In many cases, the Services Operator or the Data Controller in connection with the provision of the Services use Outsourcing Services, which the Data Manager cooperates with External Providers.

For Personal Data handled by External Service Providers, the terms and conditions of the External Service Providers' own privacy policy are governed. The Data Controller shall do its utmost to ensure that the External Provider manages the Personal Data transmitted to you in accordance with the law and uses it solely for the purposes specified by the User or in this Prospectus for the purposes set out below.

The Data Controller informs Users about the data transmission to External Providers in the context of this Prospectus.

10.2 External Service Providers who can register or access

The Service Providers and / or the Data Controller cooperate with External Providers for the provision of Services that provide users with registration and access applications. Within this cooperation, some Personal Data (such as IP Address, Email, Registration Name) may be transferred to the Data Controller and / or Data Processor by External Service Providers. E External Service Providers collect, manage and transmit Personal Data according to their own privacy policy.

External Service Providers who cooperate with the Data Administrator: Facebook Inc.

10.3 Webanalytical and Ad Server External Service Providers

Related to the Services pages, the Operators of the Service and / or the Data Controller work with the Webanalytical and Ad Server External Operators.

E External service providers can access the User's IP address, and in many cases cookies, occasionally web beacons (IP address, Web tag for web pages, occasionally e-mail or mobile apps), clicktag (one by using a marking metric code identifying clicks on a particular ad) or other click metrics to provide personalization or analysis of the Services or to generate statistics.

Cookies placed by these External Service Providers can be deleted from the User's Device at any time by choosing the appropriate settings for the browser (s) to refuse cookies. The cookie placed by External Providers can be identified based on the domain associated with that cookie. Rejection of web beacons, clicktags, and other click metrics is not possible.

E External Service Providers will transfer their Personal Data to their personal data according to their own privacy policy.

10.4 Web analytics and ad server that cooperates with the Data Manager External Providers:

Facebook Inc.

Google Inc.

10.5 Payment Providers

The Service Operators will contract for some of their services available for remuneration and with the External Providers providing payment for the provision of the webshop service. The Outsourcing Service Providers provide personal data (such as their name, bank card number, bank account number etc.) available to them in accordance with the provisions of their respective privacy notice, for which further information can be obtained on the website of the External Provider providing that payment. These data are not stored by the Data Manager.

Outsourcing providers that work with Data Manager: PayPal, Stripe

10.6 Provision of a placeholder service

For the purposes of providing the Services, the Data Controller shall consider External Providers the Users who use the data provided by the Data Controller as storage space. The User may upload personal information on his / her own storage site.

In all cases where the Data Controller provides hosting services as a service provider, data management activities are not performed in connection with the Personal Data handled on the storage site. For the management of the data processed here, all users are responsible for hosting the hosting service.

10.7 Other External Service Providers

There are External Service Providers who neither the Services Operator nor the Data Controller have any intentional cooperation with any contractual relationship or with respect to the particular data management, however, regardless of the Website of the Services, either by the User's involvement (eg by linking the Individual Account to the Service) , whether they are accessed or accessed on the Users or on the Services' websites, from which they may, individually or individually, associate with the data collected by this External Provider, be capable of identifying the User. Such External

Service Providers may, in particular but not limited to:

Facebook Ireland LTD., Google LLC, Instagram LLC., PayPal Holdings

X. External Providers Inc., Pinterest Europe Ltd., Twitter International Company, Viber Media LLC, Vimeo INC., Yahoo! EMEA Ltd., YouTube LLC

E External Service Providers will transfer their Personal Data to their personal data according to their own privacy policy.

XI. Transfers to third parties

11.1 The Data Controller is entitled and obliged to transmit to the competent authorities any personal data that is available to him and which he or she has legally stored, which is required by law or by a statutory obligation to transmit Personal Data. Due to such Data Transfer and the resulting consequences, Data Controller can not be held responsible.

11.2 The Data Controller shall keep a data transfer record for the legality of the data transfer and to ensure that the User is informed.

XII. Modify the Privacy Statement

12.1 The Data Controller reserves the right to modify this Prospectus at any time by its unilateral decision.

12.2 The User accepts the applicable provisions of this Prospectus at the next entry, and there is no need to request the consent of each User.

XIII. Law Enforcement Options

13.1 Any data processing issues or observations can be searched by the Data Processing Staff at info@dr-factor.com.

13.3 In the event of a violation of the User's rights, you may refer the matter to the court. The trial is governed by the jurisdiction of the court. The case may be initiated before the tribunal of the domicile or place of residence of the person concerned, according to his choice. The Data Handler informs the User of the opportunity and means of redress upon request.

28. March 2019.