Privacy Policy

1. **General information:**

On the processing of data during the use of the Zenctuary application **(hereinafter referred to as the "Application").**

The purpose of this Privacy Policy is to provide information about data processing to the users of the Application (hereinafter: User).

The Data Controller shall process any data obtained by it in compliance with the data protection regulations in force at all times, in particular Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Information Act) and Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR or General Data Protection Regulation).

Data Controller: for the purposes of this Privacy Policy, the Moholy-Nagy University of Art and Design, which determines the purposes and means of data processing independently or jointly with others; if the purposes and means of data processing are determined by EU or Member State law, the Data Controller or the specific criteria for the designation of the Data Controller may also be determined by EU or Member State law;

Data processing: any operation or set of operations performed on data or data sets by automated or non-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.

2. **About data protection**

The Data Controller ensures the protection of data, the management and preservation of data. The Data Controller may only use the data for the purposes indicated below, will not merge them with databases from other sources, and will make all reasonable efforts to protect the data.

3. **Name of the Data Controller:**

- name: Moholy-Nagy University of Art and Design; (hereinafter: MOME)
- Registered office: 1121 Budapest, Zugligeti út 9-25.
- e-mail: info@mome.hu;
- representatives of the Data Controller: Csaba Kovács, acting rector; Réka Matheidesz CEO
- Data Protection Officer: Dr. Márk Kovács
- e-mail: jog@mome.hu

4. Scope of processed data:

The Data Controller does not collect or process personal data in any form.

a) Spatial data: Scene, mesh, depth and point cloud data to understand the environment.
b) User interaction metrics: Anonymized performance, feature usage, and in-app activity.

5. Purpose of data processing:

Sections 4.a) and 4.b) points: research goal and app optimization goal

6. Duration of data processing

In cases 4.a)-b), 5 years from the date of its recording.

7. Availability of data:

Regarding points 4.a) and 4.b) : employees of MOME and employees of Code and Soda Ltd., who are developing the app.

8. Data storage and data security:

Sections 4.a) and 4.b): Meta's Developer Analytics dashboard

9. Other facts related to data processing:

During data processing, no automated decision-making or profiling is carried out based on your data. The data is stored electronically, and the electronically stored data can only be accessed by the appropriately authorized employees for the purposes specified in this Privacy Policy.

10. *Right to legal remedy (Chapter VIII of the GDPR):* if you believe that the University has violated your rights related to your personal data, you may request the University to remedy your adverse situation, file a complaint with the National Authority for Data Protection and Freedom of Information (hereinafter referred to as *the Authority),* or turn to the court.

The seat of the Authority: 1055 Budapest, Falk Miksa utca 9-11.
The postal address of the Authority: 1374 Budapest, Pf. 603.
Telephone number of the Authority: +36 1 391 1400
Fax number of the Authority: +36 1 391 1410
Authority's email address: ugyfelszolgalat@naih.hu
Address of the Authority's website: www.naih.hu

If you consider that we are not acting lawfully in the course of data processing, please first communicate your comments or requests to us as Data Controller - *at one of our contact details listed above* **- in order to be able to process and manage the comment as quickly and efficiently as possible.**

11. How to submit privacy requests

You can submit your requests to exercise your data protection rights electronically at the jog@mome.hu email address.

The University will inform you of the measures taken in response to the application as soon as possible, but no later than within 30 days. This deadline may be extended once, by a maximum of 60 days, due to the complexity of the application or the number of applications, of which the University will officially inform you within 30 days of the receipt of the request.

12. Warranty and safety measures

The University implements appropriate technical and organizational measures to ensure that, by default, only data that is necessary for the specific purpose of data processing is processed. This obligation applies to the amount of data collected, the extent to which they are processed, the duration of their storage and their accessibility.

In addition to the above, the University protects the data with additional physical (electronic property protection systems at the University's headquarters), logical (password protection, firewall, access management) and administrative (creation of a dedicated policy for the property protection systems, training of staff in data protection and information security) measures proportionate to the risk of data processing, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against the accidental destruction and damage.