

Last updated: 17 August 2023

We are committed to protecting your privacy. This policy sets out how we collect, use and store your personal information so we may render our services to you.

The [Terms of Service](#), together with our [Privacy Policy](#) and [Cookie Policy](#) govern 4D Interactive Anatomy's relationship with you in relation to this Website (collectively: Terms). Please read them carefully. If you have any questions regarding these Terms, please use the contact us form.

Privacy Policy

1. Goals of this Privacy Policy

- 1.1 The purpose of this Privacy Policy (hereinafter referred to as the "Notice") is to ensure that we comply with the requirements of the Hungarian Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Information Act") and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "Regulation" or "GDPR").
- 1.2 In line with our commitment to the high level of protection of personal data, we provide you with simple and transparent information about the details of the processing of your data, what data we collect and for what purposes, how and for how long we process and store it, and what rights you have and how you can exercise them in relation to the processing of your personal data.

2. Who we are

- 2.1 "4D Interactive Anatomy", "4DIA", "4D Anatomy", "us", "we" are 4D Interactive Anatomy Zrt., a private company limited by shares, registered in Hungary (address: Teréz körút 38., Budapest 1066, Hungary; Hungarian tax registration number: 14561522-2-42, EU VAT registration number: HU26255585). Within the context of this Privacy Policy 4D Interactive Anatomy Zrt., is your data controller.

3. How can you contact us (Data Protection Officer)

- 3.1 If you have any questions about our privacy practices, please contact our Data Protection Officer, Dr. Attila Álmos Balogh by mailing us at 4D Interactive Anatomy Zrt., Teréz körút 38., Budapest 1066, Hungary or emailing us at dataprotection@4danatomy.com.

4. Why we need your information

- 4.1 In order to render you the services you seek, we need to gather certain information about you based on your legitimate interest. Furthermore, we also need information from you in order to comply with the relevant contractual obligations, laws, and regulations that apply to us.
- 4.2 By providing us with your information, you consent to our collection and use of the information you provide in the way(s) set out in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our website, social media, or any other services.

5. When do we collect information about you

- 5.1 When you sign up on our website to have a free trial, contact us through a contact form, respond to an open call, engage with our social media, visit us at an exhibition or conference in person and share your information with us.
- 5.2 When you give permission to third party organizations to share your information with us. For example, if you sign up to receive updates from Facebook, Twitter, or LinkedIn these organizations may share your information with us. This may also include an institution where you study (e.g. university) or work (hospital) that has an agreement with us in order to provide you with the services they requested.
- 5.3 When you visit our website. Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies are used by most major websites and work by placing small amounts of information on to your computer. A cookie often contains a unique number, which can be used to recognize your computer when a user of your computer returns to a website that it visited previously. Please also read our Cookie Policy for more information.

6. What kind of information we collect about you

- 6.1 Personal information is any information that can be used to identify you. The type and quantity of information we collect, and how we use it, depends on why you are providing it. But we will only ever collect the information we need, including data that can help us to improve our services.
- 6.2 We collect two types of information from you:

Non-personal information such as website pages accessed and files downloaded. This helps us to monitor how many people use our website, how many people visit on a regular basis, and how popular different pages are. This information doesn't tell us anything about you, it simply allows us to monitor and improve our service.

Personal information which may include your name and contact details (postal and email address). We collect this information in connection with specific activities, such as newsletter requests, free trial requests, competition entries etc. You don't have to disclose any information to us, however if you do choose to withhold requested information, we may not be able to provide you with certain services.

7. What we do with your information

- 7.1 Depending on your relationship with us, and the preferences you have indicated, the information you give us may be used to:
 - Fulfill your requests or provide you with the services, products or information you asked for – such as a free trial access, newsletters, etc.
 - Keep a record of your relationship with us
 - Ensure we know how you prefer to be contacted
 - If you have agreed to it, to provide you with information that we think may be of interest to you, e.g. news and product updates
 - Carry out research and analytics on the demographics, interests and behavior of our subscribers to help us improve our service
 - Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an e-newsletter from us is opened and/or how many links are clicked within the message. The data from this tracking is used in an

aggregated and anonymised form.

7.2 With your consent, we will contact you to keep you up to date with our news or events. Our forms and website have clear marketing preference questions and we include information on how to opt-out when we send you any marketing material. If you don't want to hear from us, please just let us know when you provide your data, by unsubscribing from our newsletters or emails at any time or by contacting us by email at dataprotection@4danatomy.com

8. Data processors, who can access your information, and how we keep it safe

8.1 We take looking after your information very seriously and we ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted and our network is protected and routinely monitored.

8.2 Unfortunately, information transmitted over the internet is never 100% secure, so while we do our best to try to protect the security of your information, we cannot guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

8.3 The information we collect about you will mainly be used by our staff so that we can support you and provide you with the services you have requested. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contractors. Need-to-know-basis is applied in all cases.

8.4 We will never sell or share your personal information with organizations so that they can contact you for any marketing activities.

8.5 When you sign up for our email newsletter, contact us for an institutional quote, and in some other cases we might share your information with our trusted suppliers and partners who work with us deliver our services or process personal data on our behalf to provide you with our services. This is in your legitimate interest. We do comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

8.6 Our current list of suppliers and why we work with them include:

- HubSpot Ireland Ltd. (for keeping communication records, managing email newsletters)
- ZenLeads Inc. (for managing one-to-one email communication)
- DigitalOcean LLC. (for login authentication)
- Mailgun Technologies Inc. (for automatic emails when you register for example)
- Google Commerce Ltd. (for keeping communication records, managing documents, etc.)

From time-to-time we may work with other suppliers not mentioned above. This is done to deliver a service level and quality that you would expect from service providers such as Us.

8.7 Some of these suppliers run their operations outside the European Economic Area (EEA). We will take steps to make sure all of our suppliers provide an adequate level of protection in accordance with data protection law. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside the EEA.

8.8 We may also need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and

informed consent.

9. How long will we keep your data?

9.1 We will only keep your data (based on your consent and legitimate interest) for as long as we need to in order to render the services which you have requested. You may request that we dispose of your data at any time if you no longer wish to receive the services, or limit the use of it to certain extents.

9.2 We are obligated to keep your data for as long as it is required based on the relevant legal, tax, and accounting rules. This may vary in accordance of the extent of the services you requested and used.

9.3 When your data is no longer needed, we will dispose of it in a secure manner.

10. Your rights

10.1 You have various rights under the relevant regulations in respect of the personal information we have about you:

- Right to access – you have a right to ask for a copy of any information we hold about you (known as a subject access request).
- Right to rectification – we will always endeavour to keep the information we hold on you up to date and would really appreciate it if you can let us know if any of your details change. If you do notice that any of your information is wrong, please let us know so that we can correct it.
- Right to erasure – you can ask us to ‘forget’ you. This means we will stop processing your personal data and erase it from our system. If the information is not necessary for the purpose you provided it to us (e.g. it is no longer necessary for us to use it for the processing of a live contract), and so long as it does not breach any legal obligations we have, we will do so.
- Right to restrict processing – alternatively, you may prefer to ask us to restrict the processing of your data. This means that we will keep your information, but will only process it in certain circumstances.
- Right to data portability – you have the right to obtain and reuse a copy of the personal information we hold on you to use for your own purposes. We will provide the information in an easily transferable form (usually a CSV file). This right only applies to information that you have provided to us and where we have processed it either with direct consent from you, or for the performance of a contract.
- Right to object – you have the right to object to the processing of your information if we have based the processing on a legitimate interest rule or are processing it for direct marketing, historical research or statistical analysis.
- Rights relating to automated decision making – we do not carry out any automated decision making or profiling activity.

10.2 If you wish to exercise any of your rights, please contact our Data Protection Officer, Dr. Attila Álmos Balogh by mailing us at 4D Interactive Anatomy Zrt., Teréz körút 38., Budapest 1066, Hungary or emailing us at dataprotection@4danatomy.com. You will need to tell us what information you would like to see and prove your identity with two pieces of approved identification.

- 10.3 We will aim to respond to your request as soon as possible and always within one month of receipt.
- 10.4 Please note that some of these rights only apply in certain circumstances and we may not be able to fulfill every request. If for any reason we are unable to fulfill your request, we will inform you as soon as possible and always within one month of receipt of the request.

11. Reporting a data breach

- 11.1 If we become aware that there has been a security breach, for example, the accidental or unlawful destruction, loss, alteration or unauthorized disclosure of somebody's personal data, we will report this to the relevant supervisory authority within 72 hours of becoming aware of the breach.
- 11.2 If the breach is likely to cause adverse effects to the individual whose data has been breached, we will also notify that individual as soon as possible.
- 11.3 If you become aware that a data breach happened or you find a security issue, please report it to us immediately at dataprotection@4danatomy.com so we may take the appropriate actions.

12. Concerns, complaints, and legal actions

- 12.1 If you have any questions relating to your personal information, please contact our Data Protection Officer, Dr. Attila Álmos Balogh by mailing us at 4D Interactive Anatomy Zrt., Teréz körút 38., Budapest 1066, Hungary or emailing us at dataprotection@4danatomy.com.
- 12.2 If having contacted us you still have any concerns regarding the way we handle your personal information, you have the right to lodge your concern with the supervisory body, the Hungarian Data Protection body: Nemzeti Adatvédelmi és Információszabadság Hatóság (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu).
- 12.3 If the supervisory authority does not deal with your complaint submitted to them, or if it does not inform you of the procedural developments related to the complaint or its result within three months, or if you consider that the processing of your personal data violates your rights related to the protection of personal data, you are entitled to go to court. In this case, legal proceedings against the supervisory authority must be initiated before the Budapest-Capital Court or the court of your usual place of residence.