

InviteOnly – Privacy Policy

1 . Introduction

Thank you for choosing InviteOnly (the “**Service**”). We respect your privacy and process personal data transparently and in accordance with the EU General Data Protection Regulation (**GDPR**) and all applicable local laws.

This Privacy Policy applies to two user groups:

1. **Providers** who use our web application to publish service offers; and
2. **Influencers** who use our mobile application to discover and redeem those offers.

A plain-language, one-page summary is available **in-app** under **Settings > Privacy snapshot**. The present document contains the full legal text.

2 . Data Controller

Legal entity / trade name	Zentai Gábor Iván e.v. (trading as “InviteOnly”)
Registered address	Mohai út 26. fsz 3., 1119 Budapest, Hungary
Contact (privacy)	privacy@inviteonly.cc
Supervisory lead authority	Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH), H-1055 Budapest, Falk Miksa u. 9-11

3 . Personal Data We Collect

Data category (purpose)	When collected	Typical fields
Account data	At registration	Full name, e-mail, hashed password, year of birth (Influencers)

Data category (purpose)	When collected	Typical fields
Provider business data	Provider dashboard	Business name, address, photos, service description
Location data	When Provider enters address	Latitude & longitude
Instagram profile & analytics	When Influencer links Instagram	Username, profile photo, follower count, aggregated demographics, engagement metrics, short-lived access token
Campaign content	When Influencer selects story / post / reel	Media ID, caption, URL, performance metrics (snapshot after 1, 4, 7 days)

4 . Purposes & Legal Bases (GDPR Art. 6)

Purpose	Legal basis
Account creation & authentication	b) contract performance
Publishing & displaying offers	b) contract performance
Geolocation of shops	f) legitimate interest (accurate map display)
Instagram integration & campaign tracking	a) consent
Analytics, service improvement, fraud prevention	f) legitimate interest
Marketing communications (optional)	a) consent

5 . Data Storage & Retention

We store data only for as long as necessary for the purposes described in this Policy or as required by law.

- **Hosting.** All data are processed on EU-based servers operated by reputable cloud infrastructure providers.
- **Retention periods.**
 - **Contact data** (e-mail correspondence, support tickets, in-app chat): kept for up to **24 months** after the last mutual interaction, unless a longer period is required to meet legal obligations or defend legal claims.
 - **Access tokens:** up to **60 days**, then refreshed or deleted.
 - **Campaign metrics:** **12 months** after a campaign ends.
 - **Account data:** while the account is active; erased within **30 days** of confirmed deletion.
 - **Usage data** (aggregated analytics, log files): retained for a **maximum of 12 months** for security and service-improvement purposes.
 - **Back-ups:** encrypted and kept for a short, limited period (typically under **30 days**).
- **Future CRM integration.** If we migrate contact data to a customer-relationship-management (CRM) system, we will notify affected users in advance and update this Policy. Continued use of the Service after the effective date constitutes acceptance unless you object.

6 . Processors & Third-Party Services

We engage a small number of trusted service providers who process data solely on our instructions and under written agreements that meet GDPR requirements (Art. 28).

Examples include:

Category	Example provider(s)	Primary purpose	Safeguard
Cloud infrastructure	DigitalOcean LLC	Hosting of servers and databases	EU location / SCCs
Social media platform	Meta (Instagram API)	Social login & insights	SCCs + supplemental measures

Category	Example provider(s)	Primary purpose	Safeguard
Mobile services	Expo	Push notifications & OTA updates	SCCs
Error / usage analytics (optional)	Sentry, Amplitude	Crash & performance reporting	SCCs

7 . International Transfers

Where personal data leave the European Economic Area, we rely on **EU Standard Contractual Clauses (SCCs)** and strong technical measures such as encryption in transit (TLS) and at rest.

8 . Security Measures

We employ industry-standard safeguards, including encryption, access controls, network isolation and regular security testing, to protect your data against unauthorised access, alteration or loss.

9 . Your Rights

After we verify your identity, you may:

- **Access** your data (Art. 15)
- **Rectify** errors (Art. 16)
- **Erase** data (Art. 17)
- **Restrict / object** (Art. 18, 21)
- **Port** data (Art. 20)
- **Withdraw consent** at any time

Requests can be sent to kapcsolat@inviteonly.cc or via the in-app *Privacy Centre*. We respond within **30 days**. You can also lodge a complaint with your local supervisory authority (in Hungary: **NAIH**).

10 . Session & Tracking Technologies

- We use an essential, secure session mechanism to keep you signed in. No non-essential or marketing cookies are set on the web app.
- The mobile app stores your sign-in credentials securely on your device. No cookies are placed.
- If we introduce optional cookies or similar tracking technologies in the future, we will first seek your explicit consent and update this Policy.

11 . Automated Decision-Making

We do **not** carry out profiling or automated decisions that produce legal or similarly significant effects.

12 . Changes to This Policy

We may update this Policy occasionally. Material changes will be announced in-app and via e-mail at least **7 days** before they take effect. Continuing to use the Service after the effective date means you accept the changes.

13 . Contact

E-mail: kapcsolat@inviteonly.cc

Postal: **Zentai Gábor Iván e.v., Mohai út 26. fsz 3., 1119 Budapest, Hungary**

This English version prevails over any translations in case of conflict.