PRIVACY NOTICE AND PARTICIPATION TERMS

Ivy Technology | Move for Movember 2026

Effective date: November 1, 2026

1. About the challenge

Ivy Technology is organising Move for Movember, a voluntary international employee activity challenge supporting men's health awareness, physical activity and teamwork.

The challenge brings together employees from the Americas and Europe & Asia, working towards a shared goal of covering 10,000 miles throughout November.

Participation is entirely voluntary. Choosing not to participate, or deciding to leave the challenge, will not result in any employment-related disadvantage.

2. Data Controller

The organisation responsible for processing personal data in connection with the challenge is:

MarkCon Informatikai Kft. (Hungary)

Registered address: 18 Dózsa György Street, 7756 Bóly, Hungary

Contact: office@markcon.hu

3. Personal Data We Collect

When you register for and participate in the challenge, we may process the following information:

- Your work email address
- Your selected Ivy Technology site
- Account registration and login information
- Technical data necessary for account security and system operation
- Activity screenshots you voluntarily upload
- Activity information visible in those screenshots, such as distance covered or activity duration
- Technical records necessary to manage your account and uploads

Passwords must be stored securely using appropriate one-way cryptographic hashing, rather than in readable form.

You are not required to provide medical records, diagnoses or other health information.

Please do not upload screenshots containing medical information, other people's personal data or information unrelated to the challenge.

4. Purpose and Legal Basis of Processing

We process personal data to:

- Register and identify participants

- Create, manage and protect user accounts
- Receive and manage activity screenshots
- Verify activity submissions
- Monitor challenge progress
- Calculate regional and global totals
- Provide necessary information about the challenge

Proposed legal basis: Legitimate interests under Article 6(1)(f) of the General Data Protection Regulation (GDPR), subject to a completed legitimate interests assessment confirming that this legal basis is appropriate.

The legitimate interest pursued is organising and administering a voluntary employee wellbeing initiative and reporting on its overall results.

We limit processing to data necessary for these purposes.

Participation is voluntary, and employees will not face any disadvantage for declining to register or discontinuing their participation.

5. Activity Screenshots

Participants may upload screenshots showing their physical activity through their personal user accounts.

Uploaded screenshots will be used only to administer the challenge and verify submitted activity information.

Individual screenshots will not be made publicly available or accessible to other participants.

Only the participant and specifically authorised personnel responsible for administering or technically supporting the challenge may access the participant's uploads.

Uploaded information will not be used for employee performance reviews, workplace monitoring or employment-related decisions.

6. Communication and Publication of Results

Ivy Technology may share updates about the challenge through internal and external communication channels.

These updates will contain only aggregated information that does not identify individual participants, such as:

- Total miles covered by participating regions
- Overall progress towards the 10,000-mile goal
- Collective challenge achievements

We will not publicly disclose individual participants' names, email addresses, personal activity results or uploaded screenshots.

Participating in the challenge does not constitute permission to use an individual's identity, photograph or personal performance data for marketing or promotional purposes.

Any such use would require a separate data protection assessment and an appropriate legal basis.

7. Data Retention

Personal data will be retained only for as long as necessary to organise, administer and close the challenge, and to handle any relevant technical or privacy requests.

- Challenge period: November 1–30, 2026
- Planned deletion date for account data and uploaded screenshots: November 30, 2026
- Retention period for technical and security logs: November 30, 2026

After the applicable retention period, personal data will be securely deleted unless further retention is required by law or is necessary and justified for the establishment, exercise or defence of legal claims.

Truly anonymised, aggregated statistics that no longer identify individual participants may be retained and used after the challenge has ended.

8. Access, Security and Service Providers

Access to personal data is restricted to authorised personnel who require it to administer the challenge or maintain the technical system.

Appropriate technical and organisational security measures will be applied to protect personal data against unauthorised access, loss, alteration or disclosure.

9. Your Data Protection Rights

Subject to the applicable conditions under the GDPR, you have the right to:

- Request information about how your personal data is processed
- Access your personal data
- Request correction of inaccurate personal data
- Request deletion or restriction of processing
- Object to processing based on legitimate interests
- Exercise other applicable rights under the GDPR

You also have the right to lodge a complaint with a competent data protection supervisory authority, particularly in the EU Member State of your habitual residence, place of work or the alleged infringement.

10. Automated Decision-Making

Personal data collected through the challenge will not be used for solely automated decision-making or profiling that produces legal or similarly significant effects concerning participants.

11. Participation Terms

Participation in Move for Movember is voluntary.

By taking part, participants agree to:

- Upload only genuine screenshots of their own physical activities.
- Avoid submitting misleading information or information relating to other participants.
- Keep their account credentials secure.
- Take part in physical activities appropriate to their individual health and fitness levels.
- Respect the privacy and personal information of others.

Participation and individual activity results will not form part of employee performance evaluations.

12. Acknowledgement

By registering, participants acknowledge that they have read this Privacy Notice and agree to the participation terms of the Move for Movember challenge.

Acknowledging this notice does not constitute separate consent to marketing activities or the public disclosure of personal data.

Privacy contact: office@markcon.hu

Last updated: 01-11-2026