

PRIVACY NOTICE

Grepton Informatikai Zrt.

Grepton Informatikai Zrt., as data controller, respects the privacy of all persons who provide personal data to it and is committed to protecting such data. Pursuant to Article 13 of the General Data Protection Regulation of the European Union (Regulation 679/2016, hereinafter: "GDPR"), it provides the following information:

Grepton Informatikai Zrt. processes the personal data recorded by it confidentially, in accordance with data protection legislation and international recommendations, and in line with this privacy notice (hereinafter: "Notice"), and takes all security, technical and organisational measures that guarantee the security of the data.

This Notice contains the principles governing the processing of personal data provided by Data Subjects.

The purpose of this Notice is to provide detailed information on all material facts relating to the processing of their personal data – in particular on the purpose and legal basis of the processing, the persons entitled to process the data, the duration of the processing, and who may become aware of the data, in accordance with the provisions of the GDPR – to persons who, in the course of using the services provided by the Data Controller (hereinafter: "Service"), enter into a customer relationship with Grepton Informatikai Zrt. as data controller (hereinafter: "Company" or "Data Controller"), or to other contracting or cooperating partners, or to persons entering the registered seat of the Company (hereinafter: "Customers"), as well as to visitors (hereinafter jointly with the foregoing: "Data Subjects") of the website <https://grepton.hu/> operated by the Company (hereinafter: "Website").

The Company provides information on other personal data processing operations to the data subject in another notice or policy, or at the time the data are collected.

Information relating to the data processing activities of Grepton Informatikai Zrt. (hereinafter: "Data Controller" or "Company"), as well as the version of the policy in force at any given time, is continuously available at www.grepton.hu.

Name of the Data Controller: Grepton Informatikai Zrt.

Company registration number: 01 10 044561

Tax number: 12613056-2-42

Representative of the Data Controller Company: Zoltán Madár, Chief Executive Officer

Contact details of the Data Controller: address: 1087 Budapest, Könyves Kálmán krt. 48-52.

e-mail: mail@grepton.hu

telephone number: +36 1 2047730

1. Scope of Data Subjects, scope of the Notice

The scope of the Notice extends to everyone whose personal data are processed by the Company for business purposes, and to everyone whose data are made available to the Company. By transferring their personal data to the Company, the Data Subject also accepts the provisions of this Notice and consents to the processing of their data in accordance with the Notice.

The personal scope of this Notice extends to the Company as Data Controller, to those persons whose data are contained in the data processing operations falling within the scope of this Notice, and to those persons whose rights or legitimate interests are affected by the data processing.

The Company primarily processes the data of natural persons who, for example, contacted it electronically with data sent to the e-mail address mail@grepton.hu, or by telephone, or in person for

the purpose of establishing a customer relationship, requested a quotation, use or have ordered the Company's services, or contacted the Company at its contact details for any other reason or purpose outside the establishment of a customer relationship, as well as persons entering the Company's registered seat. The Company also processes the data of its natural person Customers, as well as the data made available by the representatives and contact persons of its non-natural person Customers, or possibly by other Customers.

In the case of personal data of Data Subjects where the Data Subject and the person providing the personal data relating to the Data Subject are not the same, the person providing the data is responsible for having appropriate authorisation from the Data Subject in respect of the data provided, and it is that person's obligation to inform the Data Subject of the provisions set out in this notice.

The scope of this Notice extends to all data processing of the Company involving personal data, carried out electronically and/or on paper.

This Notice is in force from 26.08.2026 until further provision or withdrawal. The Company is entitled to amend this Notice unilaterally.

2. Interpretative provisions

For the purposes of this Notice, the individual definitions named below have the following meanings:

"personal data": any information relating to an identified or identifiable natural person; a natural person is identifiable who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"data processing": any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by 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;

"data controller": the Company, and furthermore any natural or legal person or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

"data processor": a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

"recipient": a natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

"third party": a natural or legal person, public authority, agency or any other body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

"consent of the data subject": any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

“special category data”: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic and biometric data aimed at the unique identification of natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons;

“health data”: personal data relating to the physical or mental health of a natural person, including data on healthcare services provided to the natural person which carry information about the health status of the natural person;

“data transfer”: making personal data accessible to a specified recipient;

“personal data breach”: a personal data breach means a breach of security relating to the processing of personal data which results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data transmitted, stored or otherwise processed.

“website”: the website <https://grepton.hu/> operated by the Data Controller

Other concepts defined by the GDPR are contained in Article 4 thereof.

3. Principles and legal basis of data processing, the data security applied, storage of personal data

General purposes of the data processing carried out by the Company:

- a.) Processing of the data of the users of the Service in connection with the performance of the Company's activities or the Service provided by it, and, in the case of legal person Customers, of their employees or of the natural persons whose data are made available by the Customers, for the purpose of the preparation, conclusion and performance of contracts, as well as the fulfilment of legal obligations and the maintenance of the customer relationship;
- b.) Processing of the Data Subject's data in connection with ensuring the rights and performing the obligations arising from the contractual relationship (including the use of the Services and the fulfilment of orders, as well as the processing of the Customers' contact persons' data);
- c.) Processing of the personal data of potential Customers for direct marketing purposes on the basis of the Company's legitimate interest;
- d.) Fulfilment of the legal obligations of the Data Subject and the Company, and enforcement of their legitimate interests;
- e.) Transfer of the Data Subject's data to business partners, where this is unavoidable, facilitates the provision of the Service to the Data Subject and the Data Subject has consented to it in advance;
- f) Following the termination of the contract concluded with the Company, the exercise of rights and the performance of obligations arising from the contract or from the provision of the Service, in particular the enforcement of claims based on the contract or arising from the provision of the Service;

Legal bases of the data processing:

- a.) The legal basis of the data processing is primarily the prior, voluntary consent of the Data Subject given on the basis of the Data Controller's prior information, and its general purpose is to ensure the provision of the Service and to keep in contact. In addition, the Company processes the data for the purpose of performing the Service, for the purpose of fulfilling its legal obligations, and for the purpose of enforcing the legal interests of the parties.

b.) In the case of voluntary data provision by the Data Subject, the Company processes the personal data with the Data Subject's consent. Voluntary consent on the part of the Data Subject also includes the conduct whereby the Data Subject, by using the Website, accepts that all rules relating to the use of the Website, including this Notice, apply to them automatically.

c.) The Data Subject has the right to withdraw their consent at any time; however, under the GDPR, if the personal data were collected with the Data Subject's consent, the Company may, in the absence of a provision of law to the contrary, continue to process the collected data even after the withdrawal of the Data Subject's consent, without further separate consent, for the purpose of fulfilling a legal obligation applicable to it, or for the purpose of enforcing its own or a third party's legitimate interest, provided that the enforcement of such interest is proportionate to the restriction of the right to the protection of personal data. The withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal. In the cases prescribed by law, data processing is mandatory.

d.) In the case of personal data of Data Subjects where the Data Subject and the person providing the personal data relating to the Data Subject are not the same, the person providing the data is responsible for having appropriate authorisation from the Data Subject in respect of the data provided, and it is that person's obligation to inform the Data Subject of the provisions set out in this Notice.

e.) The Company further draws attention to the fact that in certain cases the possible consequence of a failure to provide data is that business communication or the performance of the Service itself may encounter increased difficulties during the term of the Service, and that the provision by the Data Subject of the data to be given in the course of individual data processing activities may be a condition for the use of the Services provided by the Company.

The Company processes the personal data of Data Subjects only to the extent and for the duration necessary for the purposes set out above. Only such personal data may be processed which are indispensable for the achievement of the purpose of the processing and suitable for attaining that purpose.

The Company takes all necessary measures to ensure the accuracy, completeness and up-to-date nature of the personal data. However, given that Data Subjects are responsible for the authenticity of the data provided, Data Subjects are obliged, in the event of a change in their data, to report the changed data, where necessary, to the Company as soon as possible after the change, but no later than within 3 working days, at the contact details indicated in this Notice.

Source of the data:

The Company receives the data of Data Subjects either directly from the Data Subjects, or from its Customers, who make available to the Company the data of their contributors, employees and business partners as Data Subjects.

Duration of the data processing:

The duration of the data processing is as set out below – with the proviso that individual data processing purposes may establish a different duration, and therefore the processing periods detailed at the individual data processing purposes shall primarily prevail.

As a general rule, the duration of the processing lasts (i) until the realisation of the given data processing purpose and the erasure of the personal data, (ii) until the withdrawal of the consent relating to the processing of the Data Subject's data and, consequently, until the erasure of the Data Subject's personal data, (iii) until the enforcement of the erasure decision of the acting court/authority, (iv) in the absence of a provision of law to the contrary, until the lapse of the limitation period for the

enforceability of the rights and obligations arising from the legal relationship underlying the Company's data processing, which is 5 years under Act V of 2013 on the Civil Code.

In the case of mandatory data processing based on legislation, the relevant legislation determines the duration of the processing. With regard to invoices issued, a retention obligation of 8 years applies on the basis of the provisions of the Act on the Rules of Taxation and the Act on Accounting.

The Company retains the personal data specified in this Notice – with the exceptions set out in the points relating to the individual data processing purposes – for the period specified as a general rule in this Notice, and then erases them, or erases them at the Data Subject's request or in the event of the withdrawal of the authorisation relating to the processing of the Data Subject's data.

Review of personal data: In order to ensure that the storage of personal data is limited to the necessary duration, the data controller establishes erasure or periodic review deadlines. The periodic review deadline established by the Data Controller: 1 year

Only those employees of the Company are entitled to access the data for whom this is necessary for the performance of their job. Persons having access to personal data at the Company are subject to an obligation of confidentiality with regard to the personal data of Data Subjects, i.e. they are obliged to treat confidentially the personal data and other information that come to their knowledge in the course of the performance of their job duties or otherwise, and not to make them accessible to third parties.

Data security

The Company ensures that the data security rules prescribed by the relevant legislation are complied with. When determining and applying the measures serving data security, the Company takes into account the state of the art at any given time and, from among several possible data processing solutions, selects the one that ensures a higher level of protection of personal data, unless this would entail a disproportionate difficulty. The Company takes the technical and organisational measures and establishes the procedural rules that are necessary to give effect to the applicable legislation and the rules on the protection of data and secrets. The Company protects the data with appropriate measures against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as against accidental destruction and damage, and against becoming inaccessible as a result of a change in the technology applied.

In order to ensure the security of personal data processed on paper, the Company applies the following measures, in line with the measures set out in the Information Security Policy:

- it places the documents in a properly lockable, dry room and, within it, in a separately lockable filing cabinet;
- documents containing personal data may be transmitted exclusively in a sealed envelope, on which the marking "confidential" must be indicated;

In order to ensure the security of personal data stored on computers or on the network, the Company applies the following measures:

- The data on the computer may be accessed by persons entitled to access only with a valid, personal, identifiable authorisation (at least a user name and password).
- it ensures that only those of the Company's staff members have access to personal data for whom this is indispensable for the performance of the tasks arising from their job duties;
- only persons with the appropriate authorisation may access the data stored on the Company's central server; the Company continuously ensures measures providing protection against

unauthorised access, including the protection of software and hardware devices, as well as physical protection (access protection, network protection);

- in order to ensure the security of the stored data, the Company avoids data loss on the server by means of continuous mirroring/backup;
- the Company continuously ensures virus protection;
- it takes measures ensuring the possibility of restoring the data files, including regular backups and the separate, secure handling of the copies (mirroring, backup);
- it ensures the physical protection of the data files and the devices carrying them, including protection against fire damage, water damage, lightning strike and other natural disasters, as well as the recoverability of damage occurring as a result of such events (archiving, fire protection).

4. Description of the individual data processing operations:

Processing of the data of visitors to the Website

When the Website is viewed, the host server may automatically log technical data (e.g. IP address, browser data, visit parameters) without a separate declaration by the User. The Company processes these data for the purpose of monitoring the secure operation of the service and preventing abuse, typically for a period of less than 1 day, and then erases them. The legal basis of the processing is the voluntary consent of the Data Subject.

Scope of the data processed: session identifier

Purpose of the processing: identification

Duration of the processing: 3 days from viewing the Website.

Contact, request for information

In the event of contact or a request for information on the Website or by e-mail, the Company processes the personal data provided by the Data Subject (name, e-mail address, date, subject and text of the message, and any other data voluntarily disclosed by the Data Subject) for the purpose of identification and reply.

Legal basis: the Data Subject's consent (Article 6(1)(a) GDPR).

Duration of the processing: the time necessary to achieve the purpose, at most 5 years from the disclosure of the data, or the potential limitation period for the enforcement of claims, or until the withdrawal of consent. If no contract or agreement is concluded between the parties following the consultation, the Company erases the messages after the closure of the communication, unless another data processing purpose exists.

Data processing for business operation, partner relations and record-keeping purposes

The Data Controller also processes personal data in the course of its business activities and for administrative and record-keeping purposes, on the basis of the Data Subject's voluntary and definite consent based on prior information, which it records in writing.

Data processing for such purposes extends in particular to the following categories of data subjects:

the members and employees of the Company (on the basis of a statutory obligation);
persons in an agency (mandate) legal relationship with the Company (for contact, settlement and record-keeping purposes);

the contact and identification data of the contact persons of organisations in a business relationship with the Company (for the purposes of contact, submitting quotations, providing services, identifying customers, keeping in contact and fulfilling accounting obligations)

Scope of the data processed: name (for identification purposes), e-mail address, telephone number (contact), personal data provided in the course of performance (identification), billing/ mailing address (contact, accounting obligation), the product/activity requested (provision of the service)

The legal basis of the processing is, on the one hand, a statutory obligation and, on the other hand, the Data Subject's consent (e.g. in connection with an employment contract, a business contract or partner registration).

The personal data appear exclusively in the files and records of the given case, and their processing lasts until the document is disposed of. In order to limit storage to the necessary duration, the Data Controller reviews the data annually and erases inaccurate data without delay.

Duration of the processing: the time necessary to achieve the purpose, which typically lasts until the contractual legal relationship exists, but at most until the withdrawal of consent, or until the limitation period for the enforcement of claims (5 years from performance, limitation period), as well as until the retention period under the accounting legislation (8 years from the preparation of the report, business report or accounting record).

Presence on social media sites:

The Company is available on the Facebook social media portal, as well as on other social media sites (for example, but not exclusively: LinkedIn). The primary purpose of the content placed on these pages is to present the Company's activities and structure, job opportunities and company-related news, and to share, publish and market the content available on the website on social media.

Legal basis of the processing: Contacting and keeping in contact with the Company within and through social media sites, and other operations permitted by the social media site, are based on voluntary consent.

Scope of Data Subjects: Those natural persons who voluntarily follow, share or like the Company's social media pages, in particular the page on the facebook.com social media site, or the content appearing thereon. The Company communicates with Data Subjects through the social media site if the Data Subject contacts the Company through the given social media site, i.e. the contact is initiated by the Data Subject.

Scope and purpose of the data processed: the data published by the Data Subject themselves (name, photo, e-mail, message, rating) – for identification and contact purposes.

The Company may link the Facebook page to other social media sites in accordance with the rules of the facebook.com social media portal; therefore, publication on the Facebook page shall also be understood to include publication on such linked social media portals.

The Data Subject may obtain information on the data processing of the given social media site on that social media site.

Duration of the processing: until erasure at the Data Subject's request.

Data processing activity carried out by the Company

The Company undertakes, and provides appropriate guarantees, that the data processing activity carried out by it as data processor complies with the system of requirements laid down in the GDPR and

that appropriate technical and organisational measures ensuring the protection of the rights of data subjects are implemented.

The Company, as Data Processor, is subject to an obligation to pay damages exclusively where it has failed to comply with the instructions of the Data Controller, or with the provisions of this Notice, or with the statutory provisions applicable to the Data Processor. The upper limit of the liability of the Company as Data Processor in respect of indirect and direct damage caused by it to the Data Controller or to third parties is limited to the amount of the contractor's fees paid to the Data Processor in the year in which the damage occurred.

The Company reserves the right to engage further data processors for the data processing activity specified in this point, by amending this Notice, which the Data Subjects expressly accept.

Data processing relating to complaint handling

The Company provides the opportunity for the Data Subject to communicate their complaint relating to the product ordered, the repair carried out and/or the conduct, activity or omission of the Company orally (in person, by telephone) or in writing (e-mail, postal mail).

Purpose of the processing of the data: to ensure that the complaint can be made, to identify the Data Subject and the complaint, and to record the data arising from statutory obligations, as well as to keep in contact and to handle complaints.

Legal basis of the processing: the consent of the Data Subjects and the legitimate interest of the Data Subject (Article 6(1)(f) GDPR), and the fulfilment of a legal obligation (Article 6(1)(c) GDPR).

Scope of the data processed/purpose of the processing: name/identification, postal address/notification, e-mail address/notification, telephone number/notification, subject of the complaint/investigation of the complaint, complaint identifier/registration of the complaint

The Company examines the oral complaint immediately and remedies it as necessary. If the Customer does not agree with the handling of the complaint, or if its immediate investigation is not possible, a record is drawn up of the complaint, a copy of which is handed over to the customer.

The record drawn up of the complaint contains the following:

- the name of the Customer;
- the Customer's residential address, registered seat, and, where necessary, mailing address;
- the place, time and manner of lodging the complaint;
- a detailed description of the Customer's complaint, recording separately the objections concerned by the complaint, in order to ensure that every objection contained in the customer's complaint is fully investigated;
- a list of the documents, records and other evidence presented by the Customer;
- the signature of the person taking the record and of the customer (the latter formal element is required in the case of an oral complaint communicated in person);
- the place and time of taking the record.

Duration of the processing: Pursuant to Section 17/A(7) of Act CLV of 1997 on Consumer Protection, the Company processes the record drawn up of the complaint and the copy of the reply for five years.

Use of an electronic surveillance system (camera)

In the office building serving as the registered seat of the Company, security cameras have been installed by the operator of the office building for the purposes of protecting human life, physical

integrity and personal freedom, guarding hazardous substances, protecting business and payment secrets, testing developed systems, preventing accidents occurring in the monitored area and exploring the circumstances of accidents that have occurred, quality assurance reasons, and property protection.

Automated decision-making and profiling:

Does not take place in the course of the data processing.

Processing of the data of Data Subjects applying for a job

Purpose of the processing: The Company operates a careers page on the website www.grepton.hu, the purpose of which is to provide information on the Company's current job offers and to receive applications for them. Uploading a CV to the careers page requires becoming acquainted with and acknowledging the Privacy Notice for Job Applicants published on the website www.grepton.hu.

In addition, the Company provides – exclusively with the Data Subject's separate, voluntary consent – the opportunity to retain the Data Subject's CV for a maximum of 3 years within the framework of the Company's Talent Program, for the purpose of contacting them with future job opportunities. This consent is a voluntary declaration independent of the acknowledgement of the above notice; giving or refusing it does not affect the assessment of the pending job application, and it may be withdrawn at any time without giving reasons.

The relevant detailed rules are contained in the Privacy Notice for Job Applicants.

Processing of the data of visitors entitled to single entry

Purpose of the processing: Only private individuals or businesses holding a permit are entitled to enter the Company's premises. The Company reserves the right to determine the range of persons entering its premises. Duration of the processing: for a maximum period of 24 hours from departure.

Data processing relating to marketing

Sending newsletters:

The Data Subject may subscribe to the newsletter with the data specified below before or during the use of the services, or in any other manner. Legal basis of the processing: Subscription to the newsletter is based on voluntary consent. Scope of Data Subjects: Every natural person, and every natural person acting on behalf of a legal person, i.e. the representative of such a Customer, who wishes to be regularly informed about the Company's news and therefore subscribes to the newsletter service by providing their personal data. Scope and purpose of the data processed: name (identification), e-mail address (sending the newsletter)

The purpose of the data processing relating to the sending of newsletters is to provide the addressee with comprehensive general or personalised information on the Data Controller's latest events, news and promotional products. The Data Controller processes the personal data collected for this purpose only until the data subject unsubscribes from the newsletter list or fails to provide confirmation.

The data subject may unsubscribe from the newsletter at any time, at the bottom of the electronic messages, as well as by means of a cancellation request sent to the e-mail address mail@grepton.hu.

The newsletter may be unsubscribed from by post at the following address: Grepton Informatikai Zrt., 1087 Budapest, Könyves Kálmán krt. 48-52.

The Data Controller reviews the newsletter list every two years and, after two years, requests confirmatory consent for sending the newsletter. The Data Controller permanently erases from the data file the data of any data subject who does not give confirmatory consent. Duration of the

processing: until erasure at the Data Subject's request, or if the Data Subject does not give further consent.

Data processor engaged for sending newsletters – Mailchimp

For its newsletter-sending and e-mail marketing activities, the Company uses the Mailchimp service (operator: Intuit Inc.) as data processor.

If the Data Subject subscribes to the newsletter, the Data Subject's name and e-mail address are transferred to and stored in the Mailchimp system for the duration of the subscription.

Name of the data processor: Intuit Inc. (Mailchimp)

Registered seat: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA

Purpose of the data processing: sending marketing e-mail communications (newsletters, promotional offers) to the Data Subjects

Scope of the data processed: name, e-mail address, date of subscription, opening and click statistics

Basis of the data transfer: the transfer of data to the USA takes place on the basis of the standard contractual clauses (SCCs) approved by the European Commission

Privacy notice of the data processor: <https://www.intuit.com/privacy/statement/>

Mailchimp's data processing terms and privacy policy are available on the data processor's website. The data processor processes the data exclusively in accordance with the Data Controller's instructions, within the framework of the data processing agreement.

Debt management

Debt management includes all measures taken to collect the Company's legitimate claims and outstanding receivables. Scope of Data Subjects: persons against whom the Company has an overdue claim, and persons who are indicated by the debtor companies as contact persons or contributors for the purpose of enforcing the claims.

Purpose of the processing: identification of customers, keeping in contact, management of claims

Legal basis of the processing: the Company's legitimate interest, consent

Scope and purpose of the data processed: name, e-mail, address, telephone number, billing/ mailing address – for identification and contact purposes

Activity and process affected by the data processing: the Company contacts the representative of the Customer having a debt by telephone and/or in writing, calling on them to pay; it may make the claims available to an external debt management company at its discretion; in the course of official proceedings, or in the event of recourse to non-contentious or contentious proceedings, the Company transfers the data to the competent authorities or courts to the extent necessary.

Duration of the processing: the period available for the enforcement of claims, or, in the case of official/contentious or non-contentious proceedings, the duration thereof.

5. Backup

The Company makes backups of the electronically stored data with a frequency based on a risk assessment, which it stores on a data storage device under its own control.

The legal basis of the processing is the Company's legitimate interest (Article 6(1)(f) GDPR): compliance with the GDPR, and ensuring the continuous availability and secure retention of the data processed.

Purpose of the processing: increasing data security, retaining and, where necessary, restoring documents relating to operations, and ensuring the continuity of work processes.

6. Data processing, data transfer

In order to achieve the data processing purposes, the Company uses the services of third parties for the performance of certain of its tasks, which services may also include the processing of the personal data of Data Subjects. These third parties ("Data Processors") carry out the processing in accordance with the Company's instructions and in compliance with the provisions of the legislation in force. Only the personal data necessary for the achievement of the given purpose are transferred to the individual Data Processors for data processing purposes. The Data Processors carrying out the processing of Data Subjects' data for the Company are listed in the annex to this Policy.

Data transfers take place with the Data Subject's consent, without prejudice to their interests, confidentially, while ensuring an IT system fully complying with this, and in compliance with the purpose, legal basis and principles of the data processing. The Company transfers data to the data controllers/data processors in a contractual relationship with it, the list of whom is contained in the annex to this policy. The Company is entitled and obliged to transfer to the competent authorities all personal data which it is required to transfer by law or by a decision. In the case of a data transfer – with the exception of transfers based on legislation – the Employer transfers the Employee's personal data exclusively to recipients that have their registered seat within the territory of the European Union, or that provide appropriate guarantees that the processing carried out by them complies with the requirements of the GDPR.

7. Handling of personal data breaches

The Company does everything possible to avoid personal data breaches. A personal data breach is a breach of security which results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data transmitted, stored or otherwise processed.

The Data Controller notifies the personal data breach to the Hungarian National Authority for Data Protection and Freedom of Information without delay, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of the Data Subjects. The Data Controller keeps a record of personal data breaches, together with the measures relating to the given breach. If the breach is serious (i.e. it is likely to result in a high risk to the rights and freedoms of the data subject), the Data Controller informs the Data Subject of the personal data breach without undue delay.

8. The Data Subject's rights relating to data processing

The Company draws the attention of Data Subjects to the fact that, in the event of a complaint or comment, it is above all advisable to contact the Company as Data Controller at one of the contact details indicated in this Notice.

Rights of the Data Subject:

Information/access: The Data Subject has the right to obtain confirmation as to whether their data are being processed and, if so, to become acquainted with all material details of the processing (purpose, categories, recipients, storage period, rights, source). Upon request, a copy of the data shall be provided. For any further copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs.

Rectification: The Data Subject may request the rectification without undue delay of inaccurate data concerning them, and the completion of incomplete data.

Erasure: The Data Subject may request the erasure of their data if the purpose of the processing has ceased, consent has been withdrawn and there is no other legal basis, or the processing was unlawful.

Restriction: The Data Subject may request the restriction of the processing if they contest the accuracy of the data, if the processing is unlawful but they request restriction instead of erasure, if they need the data for the enforcement of legal claims, or if they have objected to the processing. In the case of restriction, the data may be processed only exceptionally.

Data portability: The Data Subject has the right to receive their data in a machine-readable format and to transmit them to another data controller, where the processing is based on consent and is automated. Where technically feasible, direct transmission between data controllers may also be requested.

Objection: The Data Subject may object at any time to the processing of their data based on legitimate interest; thereafter the Company may continue the processing only for compelling legitimate grounds. The Data Subject has the right not to be subject to a decision based solely on automated processing, except in the case of contractual necessity, statutory authorisation or explicit consent.

Withdrawal of consent: Consent may be withdrawn by the Data Subject at any time, without consequences. In the event of withdrawal, the processing ceases and the data are erased, provided that there is no other legal basis. The withdrawal does not affect the lawfulness of the previous processing.

The Company provides the Data Subject with a copy of the personal data being processed. For any further copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs.

9. Procedure in the event of a request by the Data Subject:

The Data Subject may address their request as set out above, or any other question or request concerning their personal data, to the representative of the Company at any of the contact details indicated in this Notice.

The Company is obliged to assess the request within 30 days of receipt of the request submitted in writing. Where necessary, taking into account the complexity of the request and the number of pending requests, the Company may extend the deadline for assessing the request. The Data Subject must be informed in advance of the fact and the reasons for the extension.

If the Data Subject's request is well-founded, the Company implements the requested measure within the procedural deadline and provides the Data Subject with written information on the implementation. If the Company rejects the Data Subject's request, it is obliged to issue a written decision thereon. In its decision, it is obliged to indicate the facts underlying the decision, the reasoning of its decision, presenting the relevant legislation and case-by-case decisions, and it is further obliged to inform the Data Subject of the legal remedies available against the Company's decision.

If the Data Subject does not agree with the Company's decision, or if the Company fails to observe the relevant procedural deadline referred to above, the Data Subject may turn to the supervisory authority or to a court.

10. Supervisory authority

If the Data Subject considers that the processing of their personal data by the Company infringes the data protection legislation in force at any given time, in particular the provisions of the GDPR, they are entitled to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

Contact details of the Hungarian National Authority for Data Protection and Freedom of Information:

Website: <http://naih.hu/>

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf. 9.

Telephone: +36-1-391-1400 Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

The Data Subject also has the right to lodge a complaint with another supervisory authority established in the European Union Member State of their habitual residence, place of work or the place of the alleged infringement.

11. Right to bring an action (right to turn to a court)

The Data Subject – irrespective of their right to lodge a complaint – may turn to a court if their rights under the GDPR have been infringed in the course of the processing of their personal data.

Proceedings may be brought before a Hungarian court against the Company as a Hungarian Data Controller. If the Data Subject wishes to initiate court proceedings against the Data Processor, such proceedings must be brought before the court of the Member State in which the Data Processor has its place of activity.

The Data Subject may bring the action before the regional court (törvényszék) of their place of residence or place of stay. In Hungary, the contact details of the regional courts are available at the following link: <http://birosag.hu/torvenyszekek>.

If the Data Subject's habitual residence is in another Member State of the European Union, the action may also be brought before the court having jurisdiction and competence in the Member State of their habitual residence.

12. Other provisions

The Company reserves the right to amend this Notice unilaterally at any time.

This Notice is in force until further provision or until withdrawal.

Annexes:

- No. 1 – List of data processors and data transfers
- No. 2 – Information on the use of cookies

Dated: Budapest, 26 August 2026

Annex No. 1: Data processors of the Data Controller

Name of the data processor: WTS Klient Gazdasági Tanácsadó Kft.

Address of the data processor: 1143 Budapest, Stefánia út 101, Tax number: 13349525-2-42

Purpose of the data processing: payroll accounting, tax advisory

Name of the data processor: Allianz Hungária Biztosító Zrt. – office building operator

Address of the data processor: 1087 Budapest, Könyves Kálmán krt. 48-52. Tax number: 10337587-4-44

Purpose of the data processing: visual area monitoring, personal and property protection

Name of the data processor: Lajtos Ügyvédi Iroda (Lajtos Law Office)

Address of the data processor: 1134 Budapest, Úszódaru u. 6. I/1.

Purpose of the data processing: legal services, attorney activity

Annex No. 2 – Information on the use of cookies

(1) In line with generally widespread internet practice, our Company also uses cookies on its website. A cookie is a small file containing a string of characters, which is placed on the visitor's computer when they visit a website. When they visit that website again, thanks to the cookie the website is able to recognise the visitor's browser. Cookies may also store user settings (e.g. selected language) and other information. Among other things, they collect information about the visitor and their device, remember the visitor's individual settings, and may be used, for example, when using online shopping baskets. In general, cookies facilitate the use of the website, help the website provide users with a genuine web experience and constitute an efficient source of information, and furthermore they enable the operator of the website to monitor the operation of the site, prevent abuse and ensure the undisturbed provision of the services offered on the website at an appropriate standard.

(2) During the use of the website, our Company's website records and processes the following data about the visitor and the device used by them for browsing:

- the IP address used by the visitor,
- the type of browser,
- the characteristics of the operating system of the device used for browsing (language set),
- the time of the visit,
- the (sub)page, function or service visited.

In the case of technically indispensable (session) cookies, the legal basis of the processing is Section 155(4) of Act C of 2003 on Electronic Communications (Eht.), as well as the legitimate interest under Article 6(1)(f) GDPR (ensuring the secure and appropriate operation of the service). In the case of cookies requiring consent, the legal basis of the processing is the data subject's consent under Article 6(1)(a) GDPR.

Accepting and enabling the use of cookies – with the exception of strictly necessary cookies – is not mandatory. By changing the settings of their browser, the visitor may reject all cookies, or may request an indication when the system is sending a cookie, and may at any time modify or withdraw their previously given consent on the "Cookie settings" interface available on the website. Most browsers accept cookies automatically by default, but this setting may be changed in order to prevent automatic acceptance and to have the system offer the possibility of choice on each occasion.

You can find information on the cookie settings of the most popular browsers at the following links:

Google Chrome: <https://support.google.com/accounts/answer/61416?hl=en>

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Microsoft Edge: <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

Safari (macOS): <https://support.apple.com/en-us/HT201265>

Safari (iOS): <https://support.apple.com/en-us/HT201265>

Google Chrome (Android): <https://support.google.com/chrome/answer/2392971?hl=en>

In addition to the foregoing, however, we draw your attention to the fact that certain website functions or services may not work properly without cookies.

The cookies used on the website are not in themselves suitable for identifying the person of the user.

Cookies used on the Company's website:

Technically indispensable session cookies:

These cookies are necessary in order for visitors to be able to browse the website and to use its functions and the services available through the website smoothly and to their full extent, including – among other things – in particular the recording of the operations performed by the visitor on the given pages during a visit. The duration of the processing of these cookies relates exclusively to the visitor's current visit; at the end of the session, or upon closing the browser, this type of cookie is automatically deleted from their computer.

Scope of the data processed: AVChatUserId, JSESSIONID, portal_referer.

Legal basis of this processing: Section 155(4) of the Eht. and Article 6(1)(f) GDPR.

Purpose: ensuring the proper operation of the website.

Cookies requiring consent:

These make it possible for the Company to remember the user's choices relating to the website. The visitor may prohibit this processing at any time before and during the use of the service. These data may not be linked to the identification data of the user and may not be transferred to third parties without the user's consent.

Cookies facilitating use:

The legal basis of the processing is the visitor's consent. Purpose of the processing: increasing the efficiency of the service, enhancing the user experience, making the use of the website more convenient.

Duration of the processing: 6 months.

Performance cookies:

Google Analytics cookies – you can find information about these here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

We draw your attention to the fact that in the case of the use of Google Analytics, a data transfer to the United States of America to Google LLC may take place; the guarantee for the data transfer is provided by the EU-US Data Privacy Framework and the standard contractual clauses (SCC) applied by Google.

Google AdWords cookies – you can find information about these here:

<https://support.google.com/adwords/answer/2407785?hl=en>