PRIVACY POLICY

1. WHO WE ARE?

Design Terminal Public Benefit Non-Profit Limited Liability Company (seat: 1 Stúdium tér, Tatabánya, H-2800; registration number: 11-09-024678; tax number: 25717002-2-11) ("**Design Terminal**" or "we") acts as data controller.

Design Terminal according to the Directive of the European Parliament and the Council on the protection of natural persons with regard to the processing of personal data, and the Regulation (EU) 2016/679 on repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as GDPR) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as Privacy Act), creates the Privacy Policy as follows.

This Privacy Policy applies to the processing of personal data provided by the User to Design Terminal website: https://www.nexthei.com/) and to any personal data collected by Design Terminal through the use of 'Cookies'.

2. DEFINITIONS

- **Personal data**: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person;

- **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;

- **Controller:** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

- **Processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

- **Data destruction:** full physical destruction of data storage containing the data; ▪

Data transmission: making the data accessible to a specific third party;

- **Erasure of data:** making the data unrecognisable in such a way that its restoration is no longer possible;

- **User:** a natural person who visits the online surface of Design Terminal, and in this context gives the data (concerned) listed in 3.3 below;

- **Online surface:** website operated by Design Terminal: (https://www.nexthei.com/);

3. HOW DO WE COLLECT PERSONAL DATA? (DATA PROCESSING PURPOSES)

3.1. Anyone can have access to the website of Design Terminal, without providing his/her personal data, can obtain free and unrestricted information on the website and its linked pages.

3.2. The Design Terminal processes personal data on visiting the website and using the online services, based on the express consent of the User.

3.3. The purpose of data processing:

a) **participating in our NEXT-HEI program** then you shall be required to provide the following personal data: name, e-mail address, phone number, name of your company, company website if any, profile of the company, description of your idea, professional challenges);

b) **sending newsletters** (the scope of the data processed for this purpose is): name, e-mail address);

c) **supporting administrative and legal purposes**, such as fraud prevention, security and defence purposes (the scope of the data processed for this purpose: IP address).

3.4. The data controller cannot use the personal data provided for purposes other than those specified in this section. If Design Terminal intends to use the User's personal data for a new purpose not covered by this Privacy Policy, prior to the new data processing, Design Terminal notifies the User in writing of any conditions that apply to the new data processing. If required, the User's consent must be requested before starting the new data processing activity.

3.5. Design Terminal can collect non-personal information on visitors to the online surface, outside the scope of personal data, without restriction and automatically, and can automatically record (i.e. not by registration) non-identifiable technical information (such as the type of browser and operation system used by visitors of online surfaces, or the website address from which the visitor accessed the Design Terminal's online surface).

4. PROFILING

4.1. Upon the consent of the User, the Design Terminal can make profiling in order to display content and advertisement on the site tailored to the needs, wishes and interests of the User.

4.2. Profiling is any form of automated personal data processing whereby personal information is used to evaluate certain personal characteristics attached to the User, in particular, to analyse or predict characteristics related to personal preferences, interests, reliability or behaviour.

5. THE LEGAL BASIS OF DATA PROCESSING

5.1 The legal basis for the data processing activities included in point 3.3. (a) of this Privacy Policy is provided by Article 6 (1) (b) of the GDPR, according to which processing is necessary for the performance of a contract to which the data subject (User) is a party or in order to take steps at the request of the data subject prior to entering into a contract.

5.2 The legal basis for the data processing activities included in point 3.3 (b) of this Privacy Policy is provided by Article 6 (1) (a), according to which personal data is processed on the basis of the voluntary declaration of Design Terminal's Users based on appropriate information, which includes the express consent of Users that their personal information provided by them and their generated personal data are used.

5.3 The legal basis for the data processing activities included in point 3.3 (c) of this Privacy Policy is provided by Article 6 (1) (f), according to which data is processed on the basis of the legitimate interest of Design Terminal so that Design Terminal thoroughly examines the interests and fundamental rights and freedoms of the User and whether they have no priority over the legitimate interest of Design Terminal (balancing).

5.4 Personal data whose processing is necessary to comply with a legal obligation on the controller or to enforce a legitimate interest of the controller or third party (if the enforcement of this interest is proportionate to the limitation of the right to the protection of personal data) can be processed without further special consent and even after the withdrawal of the consent.

5.5 The controller does not check the personal data provided therefor. The appropriateness of the data is the exclusive responsibility of the data provider.

5.6 When the e-mail address is entered by any User, he or she is responsible for solely receiving the service from the specific e-mail address. With respect to this responsibility, any liability related to the entries using the given e-mail address shall be borne exclusively by the User who has registered the e-mail address.

6. PRIVACY POLICY PRINCIPLES APPLIED BY THE DESIGN TERMINAL

6.1. The personal data indispensable for using Design Terminal's services are used on the basis of the consent of those concerned and exclusively for a specific purpose. Design Terminal uses the Users' personal data defined in Section 3 only in the way and for the purposes defined in this Privacy Policy.

6.2. Design Terminal as controller undertakes to process the received data according to the provisions of the GDPR and Privacy Act, as well as other related legislation and those determined in this Privacy Policy and will not transfer to any third party other than the data controllers or/and data processors specified in this Privacy Policy. The use of data in a statistically aggregated form is exempted from the provisions included in this Section, which cannot contain the name of the User concerned and any other data in any form suitable for his or her identification, therefore it is not considered data processing or transmission.

6.3. In certain cases, in particular at official court or police request, legal proceeding in copyright, property or other infringement, or due to the reasonable grounds of suspicion thereof that violates Design Terminal's interest or jeopardises its provision of services, on the bases of court or other official decisions – unless otherwise provided by law – or in case of the User's prior, express consent, Design Terminal makes the User's available data accessible to third party.

7. THE PERIOD OF DATA PROCESSING

7.1. Design Terminal processes the personal data provided by the User as long as it is necessary for the purposes specified in this Privacy Policy or if the limitation period prescribed by the relevant legislation expires.

7.2. Design Terminal does not keep personal data for a longer period than justified. It is a period of 8 (eight) years from the performance of the contract concluded between the Design Terminal and User.

7.3. In the event of the use of unauthorised, misleading personal data or in the event of an offense or system attack by the User, the Data Controller is entitled to delete the User's data simultaneously with the termination of his or her registration and at the same time, in the event of a suspicion of a criminal offense or civil liability, the Data Controller is entitled to keep the data during the period of the proceeding.

8. DATA TRANSMISSION

8.1. Design Terminal is entitled and obliged to transmit to the competent authorities any available personal data stored legally by Design Terminal, which data shall be transmitted by Design Terminal required by law or order from public authority. Design Terminal is not liable for such data transmission and the resulting consequences.

8.2. Design Terminal is entitled to forward the personal data to the following consortium partners:

a) Tor Vergata University of Rome – UNITOV, Via Cracovia, 50 – 00133 Rome, Italy
b) European Business Angels Network – EBAN, Avenue des Arts 56 – 1000 Brussels, Belgium,
c) Fondazione E. Amaldi, Via del Politecnico, snc, 00133 Rome, Italy,
d) Fasttrack Ventures, Rua Cais das Naus, 1B e 1C, Parque das Nações, 1990-305 Lisboa, Portugal
e) ATHENA RESEARCH AND INNOVATION CENTER IN INFORMATION, COMMUNICATION AND KNOWLEDGE TECHNOLOGIES, Artemidos 6 & Epidavrou, 15125, MAROUSSI, GREECE
f) University of Mons, Place du Parc , 20. 7000 Mons. Belgium
g) Beder University College, Rruga Jordan Misja, Tiranë, Albania
h) Fenerbahçe University, Ataşehir Blv., 34758 Ataşehir Istanbul Istanbul Turkey

9. DATA PROCESSORS

9.1. Design Terminal may utilize the services of various data processors and external service providers to handle and process your personal data for specific purposes.

9.2. The data processors shall process the personal data at the most as long as the term of the data processing contract concluded with them is valid and in force, or until they are required to keep your data under the applicable data retention laws.

9.3. We may disclose your personal data to the following categories of third parties for the purposes described below:

a) Supreme Element Ltd. (cg.: 19-09-517507) for providing IT services and IT support.

b) Google LLC. (USA, Google Data Protection Office, 1600 Amphitheatre Pkwy Mountain View, California 94043 – Google Analytics) for providing Google Analytics services.

9.4. The data processing of such third parties may also be governed by their own privacy policies. Please review the privacy policies on the website of such third parties directly for more information about their data processing practices.

10. HOW DO WE PROTECT YOUR PERSONAL DATA?

10.1. Design Terminal complies with its obligations under the relevant data protection legislation by

• keeping personal data up-to-date;

• storing and destructing them in a safe way;

• not collecting or keeping an excessive amount of data;

• protecting personal data from loss, abuse, unauthorised access or disclosure, and provides for suitable technical measures for protecting personal data.

10.2. Design Terminal will take the appropriate technical and organizational measures to protect the personal data of the User against accidental or unlawful destruction or accidental loss or modification or unauthorised transfer or access - particularly when network transmission of

data is part of processing – as well as against all illegal forms of processing.

10.3. Accordingly, Design Terminal uses rights of access to data at different levels, which ensures that data is accessed only by persons with the appropriate authority, who need to know the data in order to be able to fulfil their obligations arising from or related to their work.

11. YOUR PERSONAL DATA PROTECION RIGHTS

11.1. According to the law on data protection User is entitled to
a) request access to his or her personal data,
b) ask for the rectification of his or her personal data,
c) ask for the delete of his or her personal data,
d) ask for the restriction of his or her personal data,
e) object to the processing of his or her personal data,
f) ask for data portability,
g) object to the processing of his or her personal data (including objection to profiling and other rights related to automated decision making),

a) Right of access

User shall have the right to receive feedback from Design Terminal about whether his or her personal data is being processed and, if such processing is in progress, request access to his or her personal data.

User shall have the right to request a copy of the personal data subject of the data processing. For the purpose of identification, Design Terminal may request further information from the User, or may charge a reasonable fee covering administrative costs for additional copies.

b) Right to rectification

User shall have the right to ask Design Terminal to rectify inaccurate personal data concerning the User. Depending on the purpose of the data processing, the User shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) Right to erasure ('right to be forgotten')

User shall have the right to obtain from Design Terminal the erasure of personal data concerning him or her and Design Terminal shall have the obligation to erase these personal data. Further service cannot be provided for the User by Design Terminal.

d) Right to restriction of processing

User shall have the right to obtain restriction of processing his/her personal data. In this case Design Terminal indicates the relevant personal data which can only be processed for particular reasons.

e) Right to object

User shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her by Design Terminal, including profiling and shall have the right to ask Design Terminal to no longer process personal data concerning him or her.

In addition, where the User's personal data are processed by Design Terminal for legitimate purposes the User shall have the right to object to the processing of the relevant personal data concerning him or her for this purpose.

In addition, User shall have the right to request human intervention in individual cases related to automated decision making. We inform you that Design Terminal does not apply automated decision-making system.

f) Right to data portability
User shall have the right to receive the personal data concerning him or her, which he or she has provided, in a structured, commonly used and machine-readable format (i.e. in digital format) and have the right to request Design Terminal to transmit those data to another controller – if transmission can be technically solved – without hindrance from Design Terminal.

g) Right of withdrawal of consent
If the User's personal data is processed on the basis of consent, the User shall have the right to withdraw his or her consent at any time by clicking on the link included in the newsletter or by changing the settings of his or her website account or mobile device. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

If the User withdraws his or her consent to processing his or her personal data provided for Design Terminal, Design Terminal may only partially provide the requested services or may not provide them at all.

h) The right to lodge a complaint with a supervisory authority
If the User thinks that his or her personal data were abused, he or she may also lodge a complaint with a local data protection authority, primarily in the Member State of his or her place of residence, workplace or the place of the suspected infringement.

In Hungary he or she can lodge the complaint with the National Authority for Data Protection and Freedom of Information: H-1125, Hungary, Budapest, Falk Miksa u. 9-11.; telephone: +36-1 391-1400; telefax: +36-1 391-1410; e-mail: ugyfelszolgalat@naih.hu).

12. CONTACT
12.1. If the User intends to exercise his or her rights of data protection or to lodge a complaint, he or she can send an e-mail to the e-mail address below to the colleague designated thereto by Design Terminal. E-mail: nexthei@civitta.com

13. OTHER PROVISIONS

13.1. Design Terminal reserves the right to change this Privacy Policy at any time by its unilateral decision. Information on modifications can be obtained on the updated website of Design Terminal.

13.2. Design Terminal reviews its online surfaces as well as the information provided there regularly and will do its best that the information is up-to-date and accurate. However, there may be information on the online surfaces that are no longer up-to-date. Design Terminal does not assume any financial liability for such information.

13.3. Visitors to the online surfaces and Users may also visit other websites not operated by Design Terminal from the Design Terminal online surfaces. Design Terminal shall not be liable for the accuracy of the data provided there, the content of the websites or the security of the data provided by visitors to these online surfaces. Therefore, when using these websites, please check the privacy policy of the company concerned.

Effective as of 15 June 2025.