

**PRIVACY NOTICE
FOR CONTRACTUAL PARTNERS AND FOR THE
CONTACT PERSONS/REPRESENTATIVES OF CONTRACTUAL PARTNERS**

EFFECTIVE FROM: 1 March 2026

LIWO FM Zártkörűen Működő Részvénytársaság (registered seat: 1133 Budapest, Váci út 116-118., Hungary; company registration number: 01-10-143608; tax number: 23480874-2-44, the **“Company”** or the **“Controller”**) respects and protects the fundamental right of its partners to the protection of personal data. On the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (the **“GDPR”**), as well as Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (the **“Infotv.”**) and other applicable provisions of Hungarian law governing data processing, the Company hereby informs (i) its contracted partners, (ii) the representatives acting on behalf of its contracted partners, and (iii) the contractual contact persons designated by the partner, about the processing of their personal data as follows.

I. DEFINITIONS, PRINCIPLES, APPLICABLE LEGISLATION

For the purposes of clarity, unambiguity, and providing information in clear and plain language, Annex 1 sets out (i) the meanings of the terms used in this privacy notice (the **“Privacy Notice”**), (ii) the principles relating to processing in line with those laid down in the GDPR, and (iii) the relevant legislation applicable to the Company’s data processing activities.

II. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER AND THE DATA PROTECTION OFFICER

Pursuant to Article 13(1)(a)–(b) and Article 14(1)(a)–(b) of the GDPR, the Company provides the data subject with the following information regarding the Controller, its representative, and the Data Protection Officer.

1. Controller

Name: LIWO FM Zártkörűen Működő Részvénytársaság

Registered seat: 1133 Budapest, Váci út 116-118., Hungary

Company registration number: 01-10-143608

Postal address: 1133 Budapest, Váci út 116–118., Tower 1, 15th floor, Hungary

E-mail: liwofm@liwofm.com

Telephone: +36-30-670-8752

Website: <https://liwofm.com/>

2. Representative(s) of the Controller

Representative: Ferenc Kis-Szölgvényi, Chief Executive Officer, or two employees authorised to represent the Company jointly

Postal address: 1133 Budapest, Váci út 116–118., Tower 1, 15th floor, Hungary

E-mail: liwofm@liwofm.com

3. Data Protection Officer (DPO)

Name: Acronym Kft., represented by Gábor Farkas

E-mail: dpo@liwofm.com

III. CHARACTERISTICS OF THE PROCESSING

1. The Company processes the following personal data of the contracted partner, the representatives acting on its behalf, and the contractual contact persons:

Categories of personal data processed	Purposes of processing	Legal basis for processing	Retention period (storage period)
The contracted partner's representative's name, position/title, signature, specimen signature (signature card/signature sample) and the data contained therein (in particular: name, basis of representation, place of residence, signature sample, ID card number, passport number, address card number), the data contained in any power of attorney.	Verification of the authority to represent in connection with the contract concluded between the parties, and the establishment, exercise and defence of legal claims relating to the contract within the applicable limitation period.	Article 6(1)(f) of the GDPR, i.e., the legitimate interests of the Company as the controller (legitimate interests related to the performance of contracts)	Until the document retention period specified in Section 169 of Act C of 2000 on Accounting (i.e. 8 years from termination of the contract).
where the contracting party is a natural person or a sole proprietor: the contracting party's name; identification data necessary for identification (in particular: mother's name, place and date of birth, ID card number, tax number/tax identification number, registration number, registered office/place of residence, correspondence address); bank account number; signature; and contact details (telephone number, e-mail address).	Preparation and performance of the contract; ensuring smooth business operations and effective communication between the parties during the performance of the contract; and the establishment, exercise and defence of legal claims relating to the contract within the applicable limitation period.	Article 6(1)(b) of the GDPR (Preparation and performance of the contract).	Until the document retention period specified in Section 169 of Act C of 2000 on Accounting (i.e. 8 years from termination of the contract).
the name and contact details of the contracted partner's employee or other contributor designated for communication and, where applicable, for certification/confirmation of performance (in particular: telephone number, e-mail address, position/title, and the name of the employer).	Preparation and performance of the contract; ensuring smooth business operations and effective communication between the parties during the performance of the contract; and the establishment, exercise and defence of legal claims relating to the contract within the applicable limitation period.	Article 6(1)(f) of the GDPR, i.e., the legitimate interests of the Company as the controller (legitimate interests related to the performance of contracts)	Until the document retention period specified in Section 169 of Act C of 2000 on Accounting (i.e. 8 years from termination of the contract).

2. Source of the data

Where the contracting party is a natural person or sole proprietor, the source of the data is the data subject. Where the contracting partner is a legal entity (non-natural person), the source of the data is the contracted partner, who provided the data subject's data in the contract concluded with the Company and/or in connection with the performance of such contract.

Pursuant to Article 13(2)(e) of the GDPR, the Company informs the natural person or sole proprietor contracting party that the provision of personal data is a precondition for entering into the contract between the parties. The provision of personal data is not mandatory; however, failure to provide the data will result in the contract not being concluded between the parties.

3. Processing based on legitimate interests

Where the contracting partner is a legal entity, the legal basis for the processing of the personal data of its representatives and/or contact persons is the Company's legitimate interests. Accordingly, the Company is required to carry out a balancing test, during which it identifies (i) the Controller's legitimate interests and (ii) the competing interests and fundamental rights and freedoms of the data subject, and then determines—based on the outcome of the balancing—whether the personal data may be processed. The Company has carried out the balancing test described above and concluded that the Company's legitimate interests in processing the personal data listed in Section III herein for the purposes of managing contractual relations prevails over the data subjects' interests in the protection of their personal data. The legal basis therefore exists and the processing is necessary and proportionate, as there is no other method or solution by which the objectives required for the enforcement of the Company's legitimate interests could be achieved without the processing of personal data. Upon request, the Company will make the balancing test available to the data subject.

IV. AUTOMATED DECISION-MAKING, INCLUDING PROFILING

The Company declares that it does not carry out automated decision-making, including profiling, on the personal data it processes.

V. RECIPIENTS OF PERSONAL DATA / CATEGORIES OF RECIPIENTS

Disclosure or transfer of personal data may take place only, in accordance with the purpose and extent of the data processing, to a limited circle of persons. The Company may disclose the above data, to the extent necessary for the fulfilment of its statutory obligations, to the tax authority or, in the case of a request from another authority, to the authority requesting the information, and in the event of legal proceedings, to the competent authority or court.

For the purposes of audit, accounting and banking administration, the Company may transfer data to the companies performing the Company's accounting and audit, as well as to banks. Data may also be transferred to another undertaking belonging to the same group of companies as the Company, which provides, among others, legal, financial, accounting, records management and administrative services to the Company.

Where the Company engages a Processor, it pays particular attention to ensuring that it only contracts with Processors that provide sufficient guarantees—under a written agreement—for compliance with the GDPR and for the implementation of appropriate technical and organisational measures ensuring

the protection of the data subject's rights. The Processors engaged by the Company are listed in Annex 2 to this Privacy Notice.

VI. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

In accordance with the applicable legal regulations, the Company may, among other cases, transfer the data of data subjects to third countries (international data transfer) in the following circumstances:

Transfers on the basis of an adequacy decision (Article 45 of the GDPR)

Pursuant to Article 45 of the GDPR, personal data may be transferred to a third country or an international organization if the European Commission has adopted a decision establishing that the third country, or a specific territory or one or more sectors thereof, or the relevant international organization, ensures an adequate level of protection equivalent to that of the European Union. Article 45(2) of the GDPR sets out the general considerations that the Commission takes into account when assessing the adequacy of the level of protection. Further information on adequacy decisions is available on the official website of the European Commission:

<https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/...>

VII. RIGHTS OF THE DATA SUBJECT

The data subject's rights and available remedies, and their limitations, are set out in detail in the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82). The data subject may request information about their personal data at any time, may request rectification, erasure or restriction of processing at any time, may object to processing based on legitimate interests and to processing for direct marketing purposes, and has the right to data portability.

The data subject has the following rights in relation to the processing of their personal data:

1. Right of access (Article 15 of the GDPR)

1.1. The data subject has the right to obtain from the Company confirmation as to whether or not personal data concerning them are being processed and, where that is the case, access to the personal data and the following information:

- a) the purposes of processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved and the significance and envisaged consequences of such processing for the data subject.

- 1.2. Where personal data are transferred to a third country or to an international organisation, the data subject has the right to be informed of the appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer.
- 1.3. The Company shall provide a copy of the personal data undergoing processing to the data subject. For any further copies requested by the data subject, the Company may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, the information shall be provided in a commonly used electronic form, unless the data subject requests otherwise. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

2. Right to rectification (Article 16 of the GDPR)

- 2.1. The data subject has the right to obtain from the Company, without undue delay, the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- 2.2. The Company shall communicate any rectification of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company shall inform the data subject about those recipients if the data subject requests it.

3. Right to erasure (“right to be forgotten”) (Article 17 of the GDPR)

- 3.1. The data subject has the right to obtain from the Company the erasure of personal data concerning them without undue delay, and the Company has the obligation to erase personal data without undue delay where one of the following grounds applies:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b) the data subject withdraws consent on which the processing is based pursuant to Article 6(1)(a) or Article 9(2)(a) of the GDPR and there is no other legal ground for the processing;
 - c) the data subject objects to the processing pursuant to Article 21(1) of the GDPR (see Section 6.1 of this Privacy Notice) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR (see Section 6.2 of this Privacy Notice);
 - d) the personal data have been unlawfully processed;
 - e) the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject.
- 3.2. Where the Company has made the personal data public and is obliged to erase the personal data pursuant to Section 3.1., the Company—taking account of available technology and the cost of implementation—shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
- 3.3. The provisions set out in Sections 3.1 and 3.2 shall not apply to the extent that processing is necessary:
 - a) for exercising the right of freedom of expression and information;

- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
- c) for reasons of public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, insofar as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- e) for the establishment, exercise or defence of legal claims.

3.4. The Company shall communicate any erasure of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company shall inform the data subject about those recipients if the data subject requests it.

4. Right to restriction of processing (Article 18 of the GDPR)

4.1. The data subject has the right to obtain from the Company restriction of processing where one of the following applies:

- a) the data subject contests the accuracy of the personal data, for a period enabling the Company to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Company no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pursuant to Article 21(1) of the GDPR (see Section 6.1 of this Privacy Notice), in such case, the restriction shall apply for the period necessary to determine whether the legitimate grounds of the Company override those of the data subject.

4.2. Where processing has been restricted under Section 4.1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

4.3. A data subject who has obtained restriction of processing pursuant to Section 4.1 shall be informed by the Company before the restriction of processing is lifted.

4.4. The Company shall communicate any restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company shall inform the data subject about those recipients if the data subject requests it.

5. Right to data portability (Article 20 of the GDPR)

5.1. The data subject has the right to receive the personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the Company, where:

- a) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the GDPR, or on a contract pursuant to Article 6(1)(b) of the GDPR; and
- b) the processing is carried out by automated means.

5.2. In exercising the right to data portability referred to in Section 5.1., the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

5.3. The exercise of the right to data portability referred to in Section 5.1. shall be without prejudice to Article 17 of the GDPR. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

5.4. The right to data portability shall not adversely affect the rights and freedoms of others.

6. Right to object (Article 21 of the GDPR)

6.1. The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on the Company's legitimate interests, including profiling based on those provisions. In such case, the Company shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

6.2. Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing.

6.3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

6.4. Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject has the right to object, on grounds relating to their particular situation, to processing of personal data concerning them, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7. Automated individual decision-making, including profiling (Article 22 of the GDPR)

7.1. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

7.2. Section 7.1. shall not apply if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and the Company;
- b) is authorised by Union or Member State law to which the Company is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

7.3. In the cases referred to in points (a) and (c) above, the Company shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, including at least the right to obtain human intervention, to express their point of view, and to contest the decision.

7.4. Automated decision-making and profiling shall not be based on special categories of personal data unless the data subject has given explicit consent or it is necessary for reasons of

substantial public interest and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.

8. Right to be informed

8.1. Where the Controller processes personal data relating to the data subject, the Controller is obliged to provide the data subject — even without a request from the data subject — with information on the key characteristics of the processing, including the purpose, legal basis and duration of processing, the identity and contact details of the Controller and its representative, the recipients of personal data (and, in the case of transfer to a third country, the appropriate and adequate safeguards), in the case of processing based on legitimate interests, the legitimate interests of the Controller and/or a third party, and the data subject's rights and available remedies (including the right to lodge a complaint with a supervisory authority), insofar as the data subject does not already have this information.

VIII. THE COMPANY'S MEASURES WHERE THE DATA SUBJECT EXERCISES THEIR RIGHTS

1. The Company facilitates the exercise of the data subject's rights. Requests may be submitted to the Controller as follows:
 - a) **by post: LIWO FM Zártkörűen Működő Részvénytársaság**, 1133 Budapest, Váci út 116–118., Tower 1, 15th floor, Hungary
 - b) **by e-mail: dpo@liwofm.com**
2. The Company shall provide information on action taken on a request without undue delay and in any event within one month of receipt of the request. Where necessary, taking into account the complexity and number of requests, that period may be extended by two further months. The Company shall inform the data subject of any extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic means, the information shall be provided by electronic means where possible, unless the data subject requests otherwise.
3. If the Company does not take action on the request, it shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.
4. The Company provides the information, communications and actions taken free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either (i) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (ii) refuse to act on the request.
5. The Company bears the burden of demonstrating that a request is manifestly unfounded or excessive.
6. Where the Company has reasonable doubts concerning the identity of the natural person making the request, it may request the provision of additional information necessary to confirm the identity of the data subject.

IX. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

1. Pursuant to Article 13(2)(d) and Article 14(2)(e) of the GDPR, the Company informs the data subject that if, in the data subject's view, the Company has not complied with the GDPR and thereby infringed the data subject's rights in relation to the processing of their personal data, the data subject has the right to lodge a complaint with the supervisory authority.
2. To ensure effective remedy of an alleged infringement, the Company recommends that, prior to lodging a complaint, the data subject first notify the Company's DPO of the alleged infringement. The initiation or conduct of the consultation does not exclude the data subject's right to lodge a complaint; however, if the consultation is successful, the legal dispute between the parties may be resolved directly.
3. **Name and contact details of the supervisory authority:**
National Authority for Data Protection and Freedom of Information (NAIH)
Registered seat: 1055 Budapest, Falk Miksa utca 9–11., Hungary
Postal address: 1363 Budapest, Pf.: 9, Hungary
Telephone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu
Website: www.naih.hu

X. RIGHT TO SEEK A JUDICIAL REMEDY

1. In the event of an infringement of their rights, the data subject may also bring the matter before the courts. Generally, the competent court is the tribunal having jurisdiction over the Controller's registered seat; however, at the data subject's choice, the action may also be brought before the tribunal of the data subject's domicile or place of residence. The tribunal shall act as a matter of priority.
2. Where the data subject has suffered material or non-material damage because of an infringement of the GDPR, the data subject may be entitled to compensation from the Controller or the Processors in accordance with the provisions of the GDPR. Where the Controller infringes the data subject's personality rights by unlawful processing or by breaching data security requirements, the data subject may claim compensation for non-pecuniary damage from the Controller.

XI. SECURITY OF DATA

1. The Company processes the personal data of the data subject confidentially, in accordance with the applicable legal regulations, and ensures an appropriate level of security of the personal data. The Company establishes the technical, organisational and administrative rules necessary to comply with applicable law, in particular the data security requirements set out in Article 32 of the GDPR.
2. When processing personal data that comes to its knowledge, the Company fully complies with the data security requirements set out in the GDPR, as well as with other applicable national and international legislation governing data processing. Personal data provided via the internet are protected with the same level of security as personal data provided by other means. The Company implements appropriate measures to protect personal data, in particular against unauthorized access, alteration, transfer, disclosure, erasure or destruction, and against accidental destruction and damage, as well as against becoming inaccessible due to changes in the applied technology.

3. In light of the above, the Controller pays special attention to:
 - a) strictly and precisely regulating access to data;
 - b) granting access only to persons for whom access is necessary to perform their tasks, and only to the data that is strictly necessary for carrying out such tasks;
 - c) selecting Processors with due care and ensuring data security through appropriate data processing agreements;
 - d) ensuring the integrity, authenticity and protection of the processed data;
 - e) maintaining appropriate and regular backups in order to ensure that the personal data of data subjects are protected against destruction or loss;
 - f) where transfer is necessary, ensuring appropriate protection of the transferred data (for example through the encryption of data files).

XII. PERSONAL DATA BREACHES

1. The Company will inform the data subject about a personal data breach — in compliance with the applicable legal provisions, where the Controller is required to inform the data subject of the incident in light of the nature of the incident — by (i) publishing a notice on the website <https://liwofm.com/> and/or (ii) sending a postal letter to the data subject.
2. If the data subject becomes aware of an incident affecting their own data or the data of another person processed by the Controller, they are kindly requested to notify the Company without delay at: dpo@liwofm.com

XIII. AMENDMENT OF THIS PRIVACY NOTICE

The Company is entitled to amend this Privacy Notice unilaterally at any time. The amended Privacy Notice will be published on the Company's website.

ANNEX 1 TO THE PRIVACY NOTICE

1) DEFINITIONS

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

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.

Restriction of processing: the marking of stored personal data with the aim of limiting their processing in the future.

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.

Personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, 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.

Data Subject: a natural person who is identified or otherwise, directly or indirectly, identifiable on the basis of any specific personal data. A natural person shall be considered identifiable if he or she can be identified, directly or indirectly, in particular by reference to a name, an identification number or to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity. For the purposes of this Privacy Notice: the Company's contractual partner and the representatives/contact persons acting on behalf of the contractual partner.

Supervisory authority: an independent public authority which is established by a Member State pursuant to Article 51 of the GDPR.

Third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

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, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2) PRINCIPLES RELATING TO PROCESSING

The Company applies, in particular, the following principles relating to processing when processing the data subject's personal data:

- a) **Principle of lawfulness, fairness and transparency:** the Company shall process the data subject's personal data lawfully, fairly and in a transparent manner in relation to the data subject;
- b) **Principle of purpose limitation:** the Company shall collect personal data only for specified, explicit and legitimate purposes and shall not further process them in a manner that is incompatible with those purposes; provided that, in accordance with Article 89(1) of the GDPR, further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes;
- c) **Principle of data minimisation:** the personal data processed by the Company shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) **Principle of accuracy:** the data processed by the Company shall be accurate and, where necessary, kept up to date; the Company shall take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) **Principle of storage limitation:** the Company shall keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely, in accordance with Article 89(1) of the GDPR, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- f) **Principle of integrity and confidentiality:** the Company shall process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- g) **Principle of accountability:** the Company shall be responsible for compliance with the principles set out in points (a)–(f) above and shall be able to demonstrate such compliance.

3) LEGISLATION APPLICABLE TO DATA PROCESSING

The Company carries out data processing in particular in compliance with the following legislation:

- a) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- b) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

- c) Act V of 2013 on the Civil Code
- d) Act C of 2000 on Accounting

ANNEX 2 TO THE PRIVACY NOTICE

1) PROCESSORS

In the course of its data processing activities, the Company engages the following Processors under written agreements for this purpose:

- a) B + N Magyarország Korlátolt Felelősségű Társaság (registered seat: 1133 Budapest, Váci út 116-118., Hungary)
(records management, administrative, accounting, financial, procurement, logistics and fleet management services)
- b) Ernst & Young Könyvvizsgáló Korlátolt Felelősségű Társaság (registered seat: 1132 Budapest, Váci út 20., Hungary)
(statutory audit)
- c) SAP Hungary Rendszerek, Alkalmazások és Termékek az Adatfeldolgozásban Informatikai Korlátolt Felelősségű Társaság (registered seat: 1031 Budapest, Záhony u. 7, Graphisoft Park, Hungary)
(provision of a cloud-based Integrated Enterprise Resource Planning (ERP) system for the management of accounting, financial and logistics processes)
- d) VCC Live Hungary Korlátolt Felelősségű Társaság (registered seat: 1117 Budapest, Október huszonharmadika utca 8-10. Allee Corner Irodaház Bercsényi Tower. 4. em., Hungary)
(Provision of a cloud-based call center and customer service software for handling incoming and outgoing calls)
- e) Microsoft Magyarország Számítástechnikai Szolgáltató és Kereskedelmi Korlátolt Felelősségű Társaság (registered seat: 1031 Budapest, Graphisoft Park 3., Hungary)
(Provision of cloud services, office software, and enterprise IT infrastructure solutions)
- f) SFDC Ireland Limited (Salesforce) (registered seat: 3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown, 18 Dublin, Ireland)
(Provision of a cloud-based CRM system, Attention CRM – Support for the Salesforce system)
- g) monday.com Ltd. (registered seat: 52 Begin Menachem Rd TEL AVIV-JAFFA, Central District, 6713701 Israel) Israel has an adequacy decision (Article 45 of the GDPR)
(Provision of an online project and workflow management platform for team collaboration and task management)