

GENERAL DATA PROTECTION POLICY

1. Processing, groups of data subjects

1.1. Ferticad Kft. as controller shall process — in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: “**General Data Protection Regulation**”), Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter: “**Privacy Act**”) and any other applicable legislation on any services that may be provided by Ferticad Kft. under the applicable law (hereinafter: “**Services**”)— the personal data of:

- 1) natural persons using the Services of Ferticad Kft.;
- 2) natural persons (e.g. legal representatives, persons authorised for disposal, beneficial owners) establishing a relationship with Ferticad Kft. on behalf of legal persons or organisations without legal personality (e.g. civil law partnerships, civil companies, condominiums, other organisations not registered by court) using the Services of Ferticad Kft.;
- 3) natural persons establishing a relationship with Ferticad Kft. for the purpose of using its Services;
- 4) natural persons specified in Point b) above acting on behalf of legal persons or organisations without legal personality (e.g. civil law partnerships, civil companies, condominiums, other organisations not registered by court) establishing a relationship with Ferticad Kft. for the purpose of using its Services;
- 5) natural persons (legal representatives, authorised representatives, signatories) representing, or acting on behalf of, persons specified in Point a);

(the parties listed in Points a)–e) above shall be hereinafter collectively referred to as “**the Data Subject(s)**”).

2. Groups of data processed

2.1. As detailed in the Information on Data Processing, Ferticad Kft. processes the following main groups of the Data Subjects’ personal data:

- 1) data prescribed by law for personal identification.
- 2) data required for liaising;
- 3) data required for the conclusion and performance of a contract for the provision of the service concerned, including, in particular, data required for the amendment or termination of a contract for the provision of the given service, or for the enforcement or assignment of a claim, factoring;
- 4) data required for performing the tax liabilities of the Data Subject or of Ferticad Kft. in relation to the Data Subject.;
- 5) data required for Ferticad Kft. to fulfil its data reporting requirements in relation to the Data Subject;
- 6) data related to complaint handling;

2.2. As detailed in the Information on Data Processing, in addition to data submitted by the Data Subjects, Ferticad Kft. may also collect the Data Subjects’ personal data from the following sources:

- i) from filing systems containing data relevant to the Data Subject that are either public and/or accessible to anyone, subject to demonstration of their right or legitimate interest;
- ii) from organisations specified in the legislation on mandatory processing;

3. Purposes of processing

3.1. Ferticad Kft. processes the Data Subjects' personal data for the following main purposes or for one or more of those purposes:

- 1) identification of the Data Subject;
- 2) liaising;
- 3) exercise of contractual rights and performance of obligations, including settlement of accounts in accordance with the legal relationship stipulated in the contract;
- 4) direct marketing;
- 5) Ferticad Kft.'s fulfilment of its tax liability in relation to the Data Subject;
- 6) Ferticad Kft.'s fulfilment of its data reporting requirement in relation to the Data Subject;
- 7) enforcement of the legitimate interest and interests of Ferticad Kft.

4. Legal bases for processing

4.1. In distributing its products and rendering its services (hereinafter collectively: "service provision") and in preparing for the service provision, Ferticad Kft. shall process the Customers' data on the grounds of one (or more) of the following legal bases:

- 1) preparing the conclusion of service contracts and the performance thereof, including the establishment, exercise or defence of pertinent legal claims;
- 2) mandatory processing;
- 3) Ferticad Kft.'s legitimate interest, including processing for direct marketing purposes;
- 4) consent of natural persons defined in Section 1.1 Points a) and c) of this Annex.

4.2. Primarily, Ferticad Kft. processes the personal data of the Data Subjects specified in Section 1 on the legal basis of preparing the conclusion of contracts for service provision and performance thereof.

5. Preparation of the conclusion and performance of contracts

5.1. For the purposes and on the grounds of preparing the conclusion of contracts for the provision of Services and the performance thereof, Ferticad Kft. processes the following data:

- 1) data to verify the contractual terms;
- 2) personal data submitted on documents submitted during the preparations for contract conclusion or communicated via other channels;
- 3) personal data submitted to Ferticad Kft. on any documents or communicated via other channels during the performance of the contract, or contained in documents prepared or otherwise obtained by Ferticad Kft. during the performance of the contract; and

5.2. Some regulations on specific services may require for contract conclusion and performance – the provision of a phone number or email address for liaising purposes.

5.3. Ferticad Kft. shall be entitled to search for the current contact details if they are incorrect or missing.

5.4. Unless prescribed otherwise by law or by a binding legal act of the European Union, claims shall lapse after five years, which means that, in cases specified in the Civil Code, the limitation period may be interrupted and recommence after such interruption or following the final conclusion of the proceedings interrupting the limitation period; or, if the obligee is unable to enforce a claim for an excusable reason, the limitation period shall be suspended. In this case, the claim shall remain enforceable within one year from the time when the said reason is eliminated even if the period of limitation has already lapsed or less than one year is remaining.

5.5. Since Ferticad Kft. would be unable to prepare, conclude and perform a contract without the personal

data required for the conclusion thereof, the Data Subject shall supply personal data for these purposes to Ferticad Kft. In the absence of such data supply, Ferticad Kft. shall be entitled to refuse concluding and performing the contract.

6. Mandatory processing

6.1. Ferticad Kft. shall process personal data on the legal basis of mandatory processing where the processing is prescribed by law or a binding legal act of the European Union. The data categories to be processed, the purpose(s) of processing, the data retention period, potential recipients of the data transfer and any other conditions for the processing are detailed in the legislation prescribing such processing.

6.2. Given that Ferticad Kft. has a legal obligation to record, store and disclose data — as required by separate legislation — subject to mandatory processing or to otherwise process personal data, failure to supply such data may lead to the refusal of the conclusion or the performance of a contract.

7. Legitimate interest as the legal basis for processing

7.1. The Data Subject may object to processing where the legal basis for processing is Ferticad Kft.'s legitimate interest.

7.2. In accordance with the General Data Protection Regulation, Ferticad Kft. shall be entitled to use the personal data of natural persons defined in Section 1.1. Points a) and c) of this Annex to dispatch paper-based consignments for direct marketing purposes and for this purpose, to conduct profiling by way of querying the data available on the natural persons above, if they did not object to processing for direct marketing purposes. Data Subjects may at any time object to the processing of their personal data for direct marketing purposes, and in such case, Ferticad Kft. shall terminate the processing of their personal data for these purposes. Whenever Ferticad Kft. contacts Data Subjects, it shall explicitly bring to their attention their right to object.

7.3. In accordance with the General Data Protection Regulation, Ferticad Kft. shall be entitled to send to the natural persons defined in Section 1.1. Points a) and c) of this Annex messages for direct marketing purposes regarding its own, similar products via email or through any equivalent individual communication channel.

7.4. Sections 7.2 and 7.3 above govern processing aimed at the use of personal data for the purposes of backtesting the success or efficiency of direct marketing activities and of using the results thereof for the purposes of designing future campaigns.

7.5. In order, amongst others, to provide exhaustive answers to the questions of persons establishing a relationship with Ferticad Kft. and to demonstrate the content and compliance of the communications with such persons if required, Ferticad Kft. is entitled under the General Data Protection Regulation to process and retain for a period of five years the personal data contained in the messages submitted to its communication channels (thus, in particular, to its postal address, email address or its other online portals) by a sender who is not a Data Subject listed in Section 1 and submitted personal data during the exchange of messages.

8. Processing based on consent

8.1. Based on the Data Subject's explicit consent, Ferticad Kft. may also process the Data Subject's personal

data.

8.2. Sensitive data relating to the disability of persons with disabilities under the Act on the Rights and Equal Opportunities of Persons with Disabilities (people with reduced mobility, blind/visually impaired, deaf/hard-of-hearing, persons unable to read/write) shall only be processed with the Data Subject's written consent exclusively for determining the method of contacting/providing customer information to the Customer and the special treatment required in the specific case; i.e. for the personalized handling of matters.

8.3. Ferticad Kft. shall process the personal data of the persons listed in Section 1.1 Points a) and c) of this Annex based on explicit consent and for the following purposes:

- to communicate advertising messages via email or through any equivalent individual communication means in consideration of the provisions of the Act on the Basic Requirements and Certain Restrictions of Commercial Practices;
- to send analysis-based, personalized direct marketing offers.

8.4. Consent is given freely, and Data Subjects may withdraw their consent at any time, without limitation, in a notification addressed to Ferticad Kft. Data Subjects may send the notification to any of the contact details listed in the Information on Processing.

8.5. A withdrawal of consent will entail no consequences with regard to the Data Subjects. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9. Data transfers to a third country

9.1. Ferticad Kft shall primarily transfer personal data to a third country or to international organisations in the cases defined in law or in a binding legal act of the European Union. Third countries are countries outside of the Member States of the European Union except Iceland, Lichtenstein and Norway.

9.2. Data transfers to third countries or to international organisations shall be also permitted where:

- 9.2.1. the Commission of the European Union has determined that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection (e.g. Switzerland, Israel);
- 9.2.2. the transfer is based on a sample data protection agreement accepted or approved by the Commission of the European Union;
- 9.2.3. the transfer is based on contractual clauses between Ferticad Kft. and therecipient of the transfer approved by the National Authority for Data Protection and Freedom of Information;
- 9.2.4. the transfer is based on a code of conduct approved by the Commission of the European Union to which the recipient of the transfer joined;
- 9.2.5. the transfer is based on a certificate which is owned by the recipient and has been approved in accordance with the General Data Protection Regulation;
- 9.2.6. the transfer is based on Ferticad Kft.'s binding corporate rules approved by the National Authority for Data Protection and Freedom of Information.

9.3. If the conditions listed in the previous paragraph are not met, Ferticad Kft. shall only transfer personal data to a third country or to an international organisation if:

- 9.3.1. the Data Subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the Data Subject;
- 9.3.2. the transfer is necessary for the performance of a contract between a Data Subject and the controller or the implementation of pre-contractual measures in response to the Data Subject's request;
- 9.3.3. the transfer is necessary for the conclusion or performance of a contract concluded in the interest of a Data Subject, between the controller and another natural or legal person;

- 9.3.4. the transfer is necessary on grounds of important public interest;
- 9.3.5. the transfer is necessary for the establishment, exercise or defense of legal claims;
- 9.3.6. the transfer is necessary in order to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of granting consent;
- 9.3.7. the transfer is made from a register which, pursuant to the laws or a binding legal act of the European Union, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by such laws or binding legal act of the European Union for consultation are fulfilled in the particular case.

10. Use of a processor

10.1. Fericad Kft. shall be entitled to engage a processor for performing certain processing operations subject to notifying the Data Subjects.

10.2. Fericad Kft., as controller, shall be responsible for the lawfulness of the instructions relating to processing operations. The processors, in turn, shall be responsible for compliance with Fericad Kft.'s lawful instructions and for performing their obligations specifically assigned to them under the General Data Protection Regulation.

11. Data retention period

11.1. Fericad Kft. shall store the data of Data Subjects for a period specified in the laws or the binding legal acts of the European Union, thus, in particular, in the legislation referred to in Sections 5 to 9 of this information document and for a period specified therein.

11.2. In the case of processing based on consent, Fericad Kft. processes the data for as long as necessary to achieve the purpose of the processing. In cases where consent is withdrawn, Fericad Kft. shall erase the data unless processing may continue on the grounds of another legal basis.

12. Rights of the Data Subject

12.1. Data Subjects rights related to data processing — including legal remedies — shall be governed by the provisions of the General Data Protection Regulation and the Privacy Act.

12.2. Data Subjects may contact Fericad Kft. to:

- iii) request information on the processing of their personal data, including a copy of their data being processed (right of access);
- iv) request the rectification of inaccurate personal data and contest the accuracy of the personal data registered (right to rectification);
- v) request the erasure of their personal data on record (right to erasure);
- vi) request the restriction of the processing of their personal data (right to restriction of processing);
- vii) request the Fericad Kft. to make available to them, in an electronic database in a structured, commonly used and machine-readable format, the personal data submitted to the Fericad Kft. and processed by the latter (right to data portability);
- viii) object to the processing of their personal data, if the purpose of data processing is the legitimate interest of the controller or of a third party (e.g. processing for direct marketing purposes), or the performance of a task in the public interest or the fulfilment of a public function, in both cases including profiling (exercise of the right to object);
- ix) lodge a complaint with regard to the processing of personal data and the exercise of their rights under the General Data Protection Regulation.

12.3. Before a Data Subject's request is granted, Fericad Kft. may ask the Data Subject to clarify the request, or specify the requested information and the processing activities concerned.

12.4. Fericad Kft. shall notify the Data Subject of the measures taken in response to the request (objection) as soon as possible, but no later than one month following the submission of the request (objection). If necessary, the above deadline may be extended by two additional months, taking into account the complexity and number of requests.

12.5. In the event Fericad Kft. has a reasonable doubt concerning the identity of the party filing a request under this Section, Fericad Kft. may request additional information to confirm the Data Subject's identity.

12.6. Where Fericad Kft. is proven unable to identify a Data Subject, it shall be entitled to refuse the request of such Data Subject.

12.7. Where a Data Subject's request is manifestly unfounded or excessive Fericad Kft. may charge a fee taking into account the following fee items:

- direct cost of the data carrier where a paper-based copy is provided;
- direct cost of the data carrier where a copy is provided on an optic data carrier;
- direct cost of the data carrier where a copy is provided on another data carrier which can be used by electronic means;
- postal service fees applicable to consignments sent via post with added service as a registered, certified mail with return receipt included;
- cost of labour input in relation to the execution of the data request (actual cost of labour required for searching for the data, consolidating and organising the data, copying the requested data from its data carrier, and rendering any data unrecognisable that cannot be disclosed to the requesting party), which is calculated by multiplying the time required for the execution of the data request by the sum of the hourly regular personal allowances of the persons participating in executing the request.

13. Right of access

13.1. Unless provided otherwise by law or by a binding legal act of the European Union, Data Subjects are entitled to access all personal data that Fericad Kft. processes concerning them.

13.2. At the Data Subject's request, Fericad Kft. shall also confirm whether it processes the Data Subject's personal data and if yes, it shall provide the Data Subject with a copy of the personal data processed along with the following information:

- the purpose of processing;
- the categories of the personal data processed;
- the recipients or categories of recipients to whom Fericad Kft. disclosed or may disclose the Data Subject's personal data;
- the envisaged period for which the personal data will be stored, or, if the provision of this information is not possible, the criteria used to determine that period;
- the Data Subject's right to request from Fericad Kft. the rectification or erasure of personal data or restriction of processing of personal data concerning the Data Subject or to object to such processing;
- the right to lodge a complaint addressed to the National Authority for Data Protection and Freedom of Information;
- in respect of personal data that was not provided by the Data Subject, information on the source from which the personal data originate;
- information on any safeguards to ensure the appropriate protection of the Data Subject's personal data in the event of transfer to a third country or to an international organisation.

13.2. Where a Data Subject requests multiple copies of the above information, Fericad Kft. may charge a

reasonable fee for additional copies in proportion to the administrative costs involved.

14. Right to rectification

14.1. At the Data Subject's request, Ferticad Kft. shall rectify or complete any inaccurate or incomplete personal data concerning the Data Subject. After granting the Data Subject's request for the enforcement of their right to rectification, Ferticad Kft. shall immediately inform the persons to whom such Data Subject's personal data have been disclosed, unless this proves impossible or involves disproportionate efforts for Ferticad Kft.

15. Right to erasure

15.1. The Data Subject shall be entitled to initiate the erasure of personal data concerning them in the following cases:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by Ferticad Kft.;
- the Data Subject withdraws the consent granted, and there is no other legal basis for processing by Ferticad Kft.;
- the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing other than processing for direct marketing purposes based on legitimate interest;
- Ferticad Kft. unlawfully processed the Data Subject's personal data;
- Ferticad Kft. is required to erase the personal data in order to comply with an obligation imposed on it by law or by a binding legal act of the European Union.

15.2. After granting a Data Subject's request for the enforcement of their right to erasure, Ferticad Kft. shall immediately inform the persons to whom the Data Subject's personal data have been disclosed, unless this proves impossible or involves disproportionate efforts for Ferticad Kft.

15.3. Ferticad Kft. shall be under no obligation to erase personal data in cases where processing is required:

- for Ferticad Kft.'s compliance with an obligation related to the processing of personal data imposed on it by law or by a binding legal act of the European Union;
- for the submission, enforcement or defence of legal claims.

16. Right to restriction of processing

16.1. The Data Subject shall have the right to obtain from Ferticad Kft. the restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the Data Subject, for a period enabling Ferticad Kft. to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- Ferticad Kft. 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 defense of legal claims;
- the Data Subject has objected to processing, pending the verification whether the legitimate grounds of Ferticad Kft. override those of the Data Subject.

16.2. Where processing has been restricted in accordance with the above, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defense 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.

16.3. Ferticad Kft. shall inform the Data Subject before the restriction of processing is lifted.

16.4. After granting a Data Subject's request for the enforcement of their right to restriction of processing, Ferticad Kft. shall immediately inform the persons to whom the Data Subject's personal data have been disclosed, unless this proves impossible or involves disproportionate efforts for Ferticad Kft.

17. Right to object

Where processing is necessary for enforcing the legitimate interests of Ferticad Kft. or of a third party Data Subjects shall be entitled to object to the processing of their personal data for these purposes. If Ferticad Kft. is unable to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms cited in the Data Subject's objection or the establishment, exercise or defense of legal claims, Ferticad Kft shall no longer process the personal data for these purposes and shall be required to erase them. Where a Data Subject objects to processing for direct marketing purposes, their personal data shall no longer be processed for such purposes.

18. Right to data portability

18.1. Data Subjects shall have the right to receive — in a structured, commonly used and machine-readable format — the personal data concerning them which they made available to Ferticad Kft. The Data Subject may exercise their right to data portability in relation to data processed by Ferticad Kft.:

- based on the consent of the Data Subject; or
- where the processing is necessary for the performance of a contract between the Data Subject and Ferticad Kft. to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.

18.2. The right to data portability may be exercised by the Data Subject in person, at a branch of Ferticad Kft., by credibly verifying their identity.

18.3. At the Data Subject's request, where technically feasible, Ferticad Kft. shall transfer the personal data directly to another controller specified in the Data Subject's request. The above right to data portability shall not give rise to any obligation for Ferticad Kft. and another controller to implement or maintain processing systems that are technically compatible with one another. Where a Data Subject's right to data portability would adversely affect the rights and freedoms — in particular, the trade secrets or intellectual property — of others, Ferticad Kft. may refuse to grant the Data Subject's request.

19. Legal remedy

19.1. Data Subjects may contact Ferticad Kft. with questions, objections or complaints related to the processing of Ferticad Kft.

19.2. Where the Data Subject considers that their rights under privacy legislation, as applicable from time to time, have been violated, the Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information.

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

Website: <http://naih.hu/>;
Address: H-1055 Budapest, Falk Miksa utca 9-11.
Postal address: H-1363 Budapest, Pf. 9.; Telephone:
+36 1 391 1400;
Fax: +36 1 391 1410;
Email: ugyfelszolgalat@naih.hu

The Data Subject may also seek judicial remedy. The litigation procedure falls within the jurisdiction of the tribunal with territorial competence, which in this case is the Budapest-Capital Regional Court. The action may also be brought at the regional court having jurisdiction at the Data Subject's home address or temporary address (see <http://birosag.hu/torvenyszekek>).

Additionally, Data Subjects may also engage a non-profit organisation or association established under Hungarian law whose objectives, as set out in its statutes, include the service of the public interest, and the defence of the rights and freedoms of Data Subjects in terms of personal data, for filing a complaint on behalf of the Data Subject, representing the Data Subject in court proceedings, and — if permitted by law — enforcing claims for damages on the Data Subjects' behalf.

20. Details of the controller

The name and contact details of the controller are the following:

Name:	Ferticad Kft.,
Seat:	H-1118 Budapest, Késmárki utca 6.
E-mail address:	info@ferticad.hu
Phone number:	+36 1 365 1428