

4iG Information Technology Ltd.

DATA PROTECTION AND DATA MANAGEMENT NOTICE

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I. PRESENTATION OF THE DATA CONTROLLER

4iG Public Limited Company (hereinafter referred to as the 'Data Controller', 'Company' or 'We') constitutes the following data protection notice in order to ensure the legality of its internal data management processes and the rights of its data subjects.

Name of Data Controller:	4iG Information Technology Private Limited Company
Company registration number of Data Controller:	01-10-143072
Head office of Data Controller:	1037 Budapest, Montevideo utca 2/C.
Electronic address of Data Controller:	dpo-itsi@4ig.hu
Data Protection Officer:	Bovard Ltd. (dpo-itsi@4ig.hu)

The Data Controller handles personal data in accordance with all applicable laws, but in particular with the following laws:

- Act CXII of 2011 on the right of information self-determination and freedom of information (hereinafter referred to as '**Info. Act**');
- Regulation (EU) No 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 (General Data Protection Regulation)(hereinafter referred to as '**Regulation**' or '**GDPR**').

The Data Controller treats personal data confidentially and takes all necessary technical and organizational measures to facilitate IT, information security and other secure data processing in order to preserve the confidentiality of the data.

Concepts

The conceptual system of this notice is the same as the interpretative explanations set out in Article 4 of the Regulation and, in addition to certain points, as the interpretative provisions of § 3. of the Info. Act.

When this notice regulates data or data management, it should be understood as personal data or their processing.

II. CHARACTERISTICS OF EACH DATA MANAGEMENT PURPOSES

1. COMMUNICATION-RELATED DATA MANAGEMENT

In today's fast-tracked world, the Data Controller primarily keeps in touch with partners and clients electronically, but anyone can also contact him by mail with questions. Anyone can contact the Data Controller by direct e-mail or by postal mail or by sending a message directly on the website <https://www.4ig.hu/kapcsolat>, whether it is a request for information, or a technical question, or a request for quotation or any other subject.

When communicating with the data subject in any case, the Data Controller handles emails and letters as described in this notice.

Purpose of data management

Communication, response to inquiries from interested parties. The data provided by the data subject will only be processed by the Data Controller for the purpose of communicating with him or her or for the administration of the message.

The Data Controller initiates contact with any data subject solely in connection with the performance of a contract already in force or by any other legal basis, in compliance with the rules on data protection.

Personal data processed

Name, e-mail address, mailing address in case of postal mail and any other information relevant to the case initiated by the data subject according to the data subject. The data subject has the possibility to voluntarily provide his/her phone number if he/she wishes to be contacted directly by Data Controller on the telephone with his reply.

Legal basis for data processing

Where the communication is made in response to a request an offer and with a view to concluding a contract, and the contracting party is a natural person (e.g. a sole trader), the legal basis for the processing of personal data is Article 6 paragraph (1) point (b) of the Regulation, i.e. the processing is necessary for the performance of a contract (obligation) or necessary to take action at the request of the data subject prior to the conclusion of the contract in which the data subject is one of the parties. The Data Controller considers that communication with data subjects is a prior data processing related to a contract (agreement) to be concluded later, or data processing related to a contract already concluded. Where the contracting party is a legal person on whose

behalf a natural person is requesting an offer, the legal basis for the processing of personal data is our legitimate interest within the meaning of Article 6(1)(f) of the Regulation.

Where the enquiry is not of a contracting or offer requesting nature, Article 6(1)(f) of the Regulation (legitimate interest) is the legal basis for the Controller to process the data. It is in the legitimate interest of the Data Controller that if he is contacted in a case, then he may process the personal data necessary for his reply.

Source of personal data

The person involved. Since the data subject is the source of the personal data, the Data Controller will provide him/her with direct information on any possible changes in the scope of the data processed when they are collected.

Recipients of personal data provided

Personal data shall be processed only by employees of the Data Controller who have the right to propose or make decisions in connection with the message sent by the data subject or in connection with the administration required on the basis of the message.

Data processor(s):

For the processing of data, the Data Controller uses the following data processors:

4iG Nyrt. (1013 Budapest, Krisztina krt. 39.) - provides services related to the operation of the website for the Data Controller.

Microsoft Corporation (One Microsoft Way, Redmond WA, USA 98052) – e-mail service provider of the Data Controller (Office 365).

Amazon Web Services EMEA SARL (38 Avenue John F. Kennedy, L-1855, Luxembourg, Registration Number: B186284, VAT ID: LU 26888617, <https://aws.amazon.com/>, https://aws.amazon.com/contact-us/?nc2=h_header) - hosting provider of the website.

Kinsta Inc. (8605 Santa Monica Blvd #92581 West Hollywood, CA 90069, United States, legal@kinsta.com) – hosting provider of the website.

Landingi Sp. z o.o. (44-100 Gliwice, Poland ul. Witkiewicza 6, VAT ID: PL6762461659) - hosting provider of the website.

Ambrus Péter E.V. (7632 Pécs, Enyezd út 7. 2/9., mail: ugyfelszolgalat@premiumwp.hu, phone: +36 70 209 3432) – operation of the website on behalf of the Data Controller

ShiwaForce.com Ltd. (17-19 Alkotás str., 1123 Budapest) - develops and maintains the website on behalf of the Data Controller.

The processors may process personal data only for the purposes specified by the Data Controller and stipulated in the contract, in accordance with the instructions of the Data Controller, and they do not have the right to decide on the processing independently. Processors have undertaken confidentiality and contractual guarantees on the retention of personal data they got to know in the performance of their duties.

The guarantees accepted by Microsoft Corporation as a data processor complying the data processing contract in accordance with Article 28 of the Regulation were entered into the 'Additions to Data Protection' document annexed to the Service Agreement. The 'Additions to Data Protection' document is available for e.g. in Hungarian, on the following website:

<https://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=2&Keyword=DPA>

Transfer of personal data to a third country or international organization

We do not transfer your personal data to parties outside the European Economic Area (EEA). In case we transfer your personal data outside the EEA, we would apply adequate safeguards to ensure that the data transfer complies with the requirements of GDPR:

Personal data may be transferred to the United States or any other country where the provider of O365 mailing system, Microsoft Corporation, or the hosting service providers Amazon.com, Inc., Kinsta Inc., or their affiliates, their sub-processors operate.

Such data transfer by Microsoft Ireland Ltd., Amazon Web Services EMEA SARL and Kinsta Inc. takes place in accordance with Chapter V of GDPR. [Microsoft Corporation](#), [Amazon Web Services, Inc.](#) and [Kinsta Inc.](#) are listed under the Data Privacy Framework List between the European Union and the United States of America, which in accordance with the implementation decision of 10 July 2023 of the European Commission provides an adequate level of protection for personal data.

Duration of processing of personal data

If a contract (agreement) of any kind is concluded between the Data Controller and the data subject, the personal data which come to his knowledge during the communication will be processed by the Data Controller in connection with that contract, up to 5 years after the termination of the contract, i.e. until the expiry of the limitation period.

If, after the pre-contract data processing, no contract or agreement is concluded between the Data Controller and the data subject, or if the communication is not related to a contract and the communication cannot have any future legal effect, then the personal

data received during the communication will be processed by the Data Controller until the final conclusion of the communication.

Automated decision-making and profiling

None of this happens during data processing.

Provision of personal data

Processing of personal data is a condition for replying to the message and thus for communication between the data subject and the Data Controller.

2. ISSUING AND KEEPING INVOICES

Purpose of data processing

The purpose of the data processing of the Data Controller is to issue and to keep invoices

- as per Act CXXVII of 2007 on value added tax (VAT Act.) § 159 (1) and § 169, and
- as per Act C of 2000 on accounting (Acc. Act) § 169 (2).

Personal data processed

The Data Controller's clients are generally legal persons, but they can also be natural agents and sole proprietors; the following data are considered personal data and are processed on the basis of the following.

The data specified in §169 in VAT Act., but at least:

- a) name,
- b) billing address,
- c) tax no.

Legal basis for data processing

The legal basis for the processing of data while issuing invoices is Article 6 paragraph (1) point (c) of the Regulation, i.e. fulfilment of a legal obligation.

Source of personal data

The affected person. Since the data subject is the source of the personal data, the Data Controller will provide him/her with direct information on any possible changes in the scope of the data processed when they are collected.

Recipients of personal data provided

Personal data are processed only by employees of the Data Controller whose responsibility is to administer invoicing.

4iG Nyrt. (1013 Budapest, Krisztina krt. 39., Budapest, 1013 Budapest) is used as a data processor for the issuing and storage of the invoice, providing accounting, bookkeeping and invoicing services for the Data Controller.

The company's auditor, Ernst & Young Auditing Limited Liability Company (1132 Budapest, Váci út 20.) in the performance of his duties, may have access to data relating to invoices, in which he acts as an independent data controller.

Transfer of personal data to a third country or international organization

The Data Controller does not transfer the above personal data of the data subject to a third country or an international organization.

Duration of processing personal data

The personal data of the data subject are processed by the Data Controller according to the Acc. Act. § 169 (2) for at least 8 years from the date of issue.

Automated decision-making and profiling

None of this happens during data processing.

Provision of personal data

The processing of all data is based on legislation and is mandatory.

3. PROCESSING OF DATA RELATED TO THE PERFORMANCE OF CONTRACTS AND PROCESSING OF CONTACT DETAILS

In order to use and provide the service, the Data Controller concludes contracts with other legal entities, which may be individuals as well as legal persons.

In the event that the Data Controller enters into a contract with a natural person, he will process other personal data necessary for the identification and contact of that person and related to the performance of the contract.

When the Data Controller enters into a contract with legal persons, it is necessary to process the data of the contact person of the partner in order to be able to communicate with each other during the cooperation and in order to maintain and deepen the cooperation on an ongoing basis.

Purpose of data processing

The purpose of data processing is to conclude and perform the contract between the Data Controller and the contracting partner, including their communication related to the contract, through which a business relationship can be established and maintained.

Processed personal data

In view of the fact that, in the case of a contract with a natural person, the source of the personal data is the data subject, the Data Controller will provide final information on the exact scope of the personal data processed at the time of conclusion of the contract. In general, in case of a natural person contracting party, the following data will be processed:

- d)** name (for identification),
- e)** mother's name (for identification),
- f)** place of birth, time (for identification),
- g)** address (for communication),
- h)** in case of a self-employed person: head office (for communication),
- i)** phone number (for communication),
- j)** e-mail (for communication),
- k)** for payment by bank transfer: bank account number, account holding bank,
- l)** if the commission fee is paid after deduction of taxes and dues, then the data management of the social security number is also necessary,
- m)** tax identification number in case of onerousness, VAT number in case of a self-employed person,
- n)** registration number in case of a self-employed person,
- o)** other data by all means necessary for the performance of the contract.

In case of a legal entity, the name of the representative, as well as the contact person's name, telephone number, e-mail address and position are managed by the Data Controller.

Legal basis for data processing

Natural person: Article 6 paragraph (1) point (b) of the Regulation: performance of a contract where the contracting party is a natural person.

If the contact person is not in a direct contractual relationship with the Data Controller, i.e. the data subject is an employee or other agent of the contracting partner, the legal basis for the data processing is the legitimate interest of the Data Controller under Article 6 paragraph (1) point (b) of the Regulation.

It is in the legitimate interest of the Data Controller to develop and maintain a business relationship with the company represented by the data subject in order to perform the contract as effectively as possible. Contacts are therefore necessary in order to develop economic cooperation and to perform the contract(s) concluded between the organizations. The data subject's personal data will not be processed by the Data Controller for any other purpose without legal basis.

Source of personal data

If the Data Controller contracts with a natural person, the source of the personal data is the data subject. In such case, the Data Controller will provide direct information on any changes in the scope of the data processed when they are collected.

In case of a contract with a legal person, the source of the contact details is the contracting party.

Recipients of the provided personal data

The Data Controller will only provide the personal data of the data subject to his/her employees who are involved in the performance of the relevant legal relationship.

The Data Controller uses 4iG Plc. (1013 Budapest, Krisztina krt. 39.) as a data processor in connection with the performance of the contract, which provides outsourced legal, procurement and accounting services to the Data Controller.

Transfer of personal data to a third country or international organization

The Data Controller does not transfer the above personal data of the data subject to a third country or an international organization.

Duration of processing personal data

The Data Controller will process the personal data of the data subjects until the expiry of the general limitation period laid down in the Civil Code after the performance of the contract (i.e. for 5 years after the termination of the contract), provided that the contract, if it constitutes an accounting document directly and indirectly supporting the accounting of accounts, is retained by the Data Controller for at least 8 years in a legible form in accordance with § 169 (2) of Act C on Accounting of 2000, which can be retrieved by reference to the accounting records.

Contact data will no longer be processed by the Data Controller for the contact purposes set out in this notice if he/she is informed that the contact person's employment relationship with the contracting partner has ceased.

Automated decision-making and profiling

None of this happens during data processing.

Provision of personal data

Personal data is mandatory for the conclusion and performance of the contract.

III. THE RIGHTS OF THE DATA SUBJECT IN RELATION TO DATA MANAGEMENT

The right to be informed

The data subject has the right to be informed on the data processing, which the Data Controller performs by providing this notice.

Consent-based data processing

If the legal basis for data processing is the consent of the data subject, then (s)he is entitled at any time to withdraw his or her prior consent to data processing. However, it is important to know that withdrawal of consent should only apply to data processing which has no other legal basis. If there is no other legal basis for the processing of the personal data concerned, the Data Controller will permanently and irrevocably delete the personal data after the withdrawal of consent. Withdrawal of consent, as per the Regulation, shall not affect the lawfulness of data processing carried out on the basis of consent prior to the withdrawal.

The right of access

At the request of the data subject, the Data Controller shall at any time provide information on whether the data subject's personal data are being processed or not, and if so, provide access to the personal data and to the following information as well:

- a) purposes of data processing;
- b) categories of relevant personal data;
- c) categories of recipients or recipients with whom the Data Controller has communicated or to whom he will disclose personal data, including in particular third-country recipients or international organizations;
- d) the intended duration of keeping personal data or, if this is not possible, the criteria for determining that period;
- e) the data subject is also informed of his/her right to request the Data Controller to correct, delete or restrict the processing of personal data relating to him or her and to object to the processing of such personal data;
- f) the right to file a complaint addressed to a supervisory authority or to initiate legal proceedings;
- g) if Data Controller did not collect the data directly from the data subject, then he should provide all available information on the source of the data;
- h) if there is automated decision-making, the fact of this, including profiling, should be disclosed, and at least in these cases, the logic used as well, i.e. the importance of such processing and the likely consequences of it for the data subject.

The right to correct personal data

The data subject shall have the right at any time, at his/her request, to correct inaccurate personal data relating to him or her without undue delay. Taking into account the purpose of the processing, the data subject is also entitled to request the supplementing – including by means of a supplementary declaration – of incomplete personal data.

If a request is made for correction (modification) of the data, the data subject shall substantiate the validity of the data correction request and the data subject shall also prove that (s)he is entitled to request data correction. This is the only way the Data Controller can assess whether the new data is valid, and if so, whether he can correct the previous data.

Furthermore, the Data Controller draws attention to the fact that the data subject should report any change in his/her personal data as soon as possible, thereby facilitating the lawful processing of data and the enforcement of his/her rights.

The right to delete personal data

At the request of the data subject, the Data Controller is obliged to delete the personal data related to the data subject without undue delay if one of the following reasons exists:

- a) the Data Controller no longer needs the personal data for the purpose because of which they were collected or otherwise processed;
- b) in case of data processing based on consent, the data subject withdraws the consent on which the processing is based and there is no other legal basis for data processing;
- c) the data subject objects to data processing and there is no overriding legitimate reason for the data processing, or the data subject objects to the data processing for the purposes of direct marketing;
- d) personal data are unlawfully processed by the Data Controller;
- e) personal data must be deleted in order to comply with the legal obligation imposed on the Data Controller by a law of the European Union or of a Member State;
- f) personal data were collected in connection with the provision of information society services.

The right to restrict data processing

The data subject has the right to request the Data Controller to restrict the data processing if one of the following is fulfilled:

- a) the data subject disputes the accuracy of the personal data; in this case, the limitation applies to the time period that allows the Data Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful, and the data subject opposes to the deletion of the data, instead (s)he requests restrictions on their use;
- c) the Data Controller no longer needs the personal data for the purposes of data processing, but the data subject requires them for the purpose of presenting, asserting/enforcing or defending his or her legal claims; or
- d) the data subject objected to the data processing; in this case, the limitation applies to the time period until it is established whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the data subject, or not.

The right to object

When the processing of personal data is in the legitimate interest of the Data Controller [Article 6 paragraph (1) point (f) of the Regulation] or if the data processing is necessary for the performance of the task carried out in the exercise of the public authority conferred on the Data Controller [Article 6 paragraph (1) point (e) of the Regulation], then the data subject shall have the right to object at any time to the processing of his or her

personal data for reasons relating to his or her situation, including to the profiling based on the above mentioned provisions.

If the data subject's personal data are processed by the Data Controller for direct marketing (i.e. sending letters of information), he/she is entitled to object at any time to the processing of personal data relating to him or her for this purpose, including profiling, in so far as it relates to direct marketing. If the data subject objects to the processing of his/her personal data for direct marketing purposes, then the personal data must no longer be processed for that purpose.

Consideration of interests test

When the legal basis for the processing of personal data is the legitimate interest of the Data Controller or a third party as per Article 6 paragraph (1) point (f) of the Regulation, the Data Controller shall draw up a written 'consideration of interests test' pursuant to preamble paragraph 47 and Article 5 paragraph (2), a copy of which the data subject may request by writing to the dpo-itsi@4ig.hu e-mail address.

The right to data portability

The data subject shall have the right to receive the personal data relating to him or her which (s)he has provided to the Controller in a structured, widely used, machine-readable format, and shall have the right to request the Data Controller to transfer that data to another data controller if:

- a) the data processing is based on the consent of the data subject or on a contract as per Article 6 paragraph (1) point (b) of the Regulation; and
- b) the data processing is carried out in an automated manner.

IV. PROCEDURE FOR ENFORCING THE RIGHTS OF THE DATA SUBJECT

The data subject can exercise the above rights by e-mail to the dpo-itsi@4ig.hu address, by mail to the head office of the Data Controller or in person at the head office of the Data Controller. The Data Controller shall begin the examination and fulfillment of the data subject's request without undue delay upon receipt of the data subject's request. The Data Controller shall inform the data subject of the measures taken on the basis of the request within 30 days of its receipt. If the Data Controller is unable to comply with the request, he shall inform the data subject within 30 days of the reasons for the refusal and of the data subject's rights to take legal action.

Within five years of the death of the data subject, the rights of the data subject in his/her life as defined in this notice shall be exercised by an authorized person by a provision of administration or by a declaration to the Data Controller – if the data subject has made more than one declaration to the Data Controller, then by the most up-to-date declaration – in a public document or a private document of full probative force. If the data subject has not made a corresponding declaration of rights, his/her close relative under the Civil Code shall be entitled, even in the absence of such declarations, to assert the rights of the dead person (s)he was entitled to in his/her life within five years of the death of the data subject, i.e. the right to object as defined in Article 21 of the Regulation, the right to correct data as defined in Article 16 of the Regulation and, if the data processing had already been unlawful in the life of the data subject or the purpose of the data processing had ceased with the death of the data subject, then the right to delete data as defined in Article 17 of the Regulation and the right to restrict data processing as defined in Article 18 of the Regulation. A close relative who is the first to exercise these rights shall be entitled to enforce the rights of the data subject as per this paragraph.

V. THE RIGHT TO TAKE LEGAL ACTION IN RELATION TO DATA MANAGEMENT

In order to exercise his or her right to judicial redress, the data subject may file a case against the Data Controller if he or she considers that the Data Controller, or the data processor or joint data controller entrusted by us or acting on our behalf, is processing his/her personal data in breach of the requirements laid down in the law on the processing of personal data or in breach of a binding Act of the European Union. The court will act out of turn in such case. The court is responsible for the adjudication of the lawsuit. The lawsuit may also be initiated – at the choice of the data subject – at the Court of the place of residence of the data subject, or at the place of stay of the data subject or at the Tribunal (Metropolitan Court) where the head office of the Data Controller is established.

By filing a complaint with the National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH), anyone can initiate an investigation against the Data Controller on the basis that there has been or there is an imminent risk of a breach of the law in relation to the processing of personal data, or that the enforcement of his or her rights in relation to the data processing is restricted by the Data Controller or that his or her request to enforce those rights is rejected by the Data Controller. The complaint can be filed by contacting one of the following contact details:

National Data Protection and Freedom of Information Authority
(Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH)
Postal address: PO Box 9, 1363 Budapest

Address: 9-11 Falk Miksa str., 1055 Budapest
Phone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu
URL: <http://naih.hu>

Budapest, 01.01.2025.