Privacy Notice — Partial English Translation

This document is a partial translation of the Hungarian privacy notice of Software Consulting Cave Kft. It contains the introduction and Section 1 only. It is NOT the complete 24-page privacy notice and must not be published as the full translation.

Introduction

The purpose of this Privacy Notice is to enable persons affected by the processing of personal data (our company’s customers, persons interested in our products and services, and other data subjects), before the commencement of processing, to learn about our company’s personal data processing practices, as well as their rights and available legal remedies.

1. Name and Contact Details of the Data Controller

Name of the Data Controller: Software Consulting Cave Kft. (hereinafter: the “Data Controller”)

Registered office: 2760 Nagykáta, Dobó utca 22, Hungary

Company registration number: 13-09-236074

Contact details of the Data Controller:

Postal address: 2760 Nagykáta, Dobó utca 22, Hungary

Email address: csabibodi@gmail.com

Website: www.digitalcave.hu

PRIVACY NOTICE — ENGLISH TRANSLATION, PART 2

Translation of source PDF pages 2–4. This installment begins with the continuation of a definition from source page 1 and ends at Section 3.3. It is not the complete privacy notice.

Continuation of the definition from the preceding page:

…are stored, and technical and organisational measures ensure that such Personal Data cannot be attributed to an identified or identifiable natural person.

Filing system: any structured set of Personal Data which is accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

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

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

Data processing by a Processor: all Processing activities carried out by the Processor on behalf of the Controller.

Recipient: a natural or legal person, public authority, agency or another body to which Personal Data are disclosed, whether a third party or not. Public authorities which may receive Personal Data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as Recipients; the Processing of those data by those public authorities shall comply with the applicable data-protection rules according to the purposes of the Processing.

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 authorised to process Personal Data.

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.

GDPR: 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).

Data Protection Legislation: the GDPR together with all other EU-level or Member State legislation concerning data processing.

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

Special Categories of Data: Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person’s sex life or sexual orientation.

Cross-border Processing of Personal Data: (a) Processing of Personal Data which takes place in the context of the activities of establishments in more than one Member State of a Controller or Processor in the Union where the Controller or Processor is established in more than one Member State; or (b) Processing of Personal Data which takes place in the context of the activities of a single establishment of

a Controller or Processor in the Union but which substantially affects or is likely to substantially affect Data Subjects in more than one Member State.

3. Principles, purposes and legal bases of Processing; determination of the retention period

3.1. Principles of Processing

Our Company follows the principles below when Processing Personal Data.

Lawfulness, fairness and transparency: We process Personal Data lawfully, fairly and in a transparent manner in relation to the Data Subject (you).

Purpose limitation: Personal Data may be collected and processed only for specified, explicit and legitimate purposes and shall not be further processed in a manner incompatible with those purposes. Further Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes is not considered incompatible with the original purpose.

Data minimisation: We process only Personal Data that are adequate, relevant and limited to what is necessary in relation to the purposes of Processing.

Accuracy: Personal Data must be accurate and, where necessary, kept up to date. We take every reasonable step to ensure that Personal Data that are inaccurate in relation to the purposes of Processing are erased or rectified without delay.

Storage limitation: We keep Personal Data only for as long as identifying Data Subjects is necessary to achieve the purposes of Processing. Longer storage is permitted only where Personal Data are processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to appropriate technical and organisational measures required to protect the rights and freedoms of Data Subjects.

Integrity and confidentiality: We ensure appropriate security of Personal Data through suitable technical and organisational measures, including protection against unauthorised access or unlawful Processing and against accidental loss, destruction or damage.

Accountability: We accept responsibility for compliance with the principles set out above.

3.2. Purpose of Processing

Each of our Processing operations is carried out for a specific purpose; we examine the lawfulness of that purpose as described in the section on legal bases below. We ensure that our Processing complies with that purpose at every stage.

The purpose of Processing also determines the categories of data processed: under the principle of purpose limitation, each item of Personal Data may be processed only to the extent and for the period necessary to achieve the purpose.

Changes in the purpose of Processing: Processing Personal Data for a purpose other than that for which they were originally collected is permitted only where the Processing is compatible with the original purposes for which we collected the Personal Data. In that case, no separate legal basis other than the one that originally permitted collection of the Personal Data is required.

3.3. Legal bases of Processing

The legal bases of Processing may be as follows:

(a) The Data Subject (for example, you) has given consent. Consent may be given for one or more specific purposes.

(b) Performance of a contract: (i) Processing is necessary for the performance of a contract to which the Data Subject (for example, you) is party; or (ii) Processing is necessary in order to take steps at the request of the Data Subject (for example, you) prior to entering into that contract.

(c) Processing is necessary for compliance with a legal obligation to which the Controller (our Company) is subject.

(d) Processing is necessary in order to protect the vital interests of the Data Subject (for example, you) or of another natural person.

(e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

(f) Processing is necessary for the purposes of the legitimate interests pursued by the Controller (our Company) or by a third party. An exception applies where those interests are overridden by interests of the Data Subject requiring protection of Personal Data, in particular where the Data Subject is a child.

Special Categories of Data may be processed in the cases specified by Data Protection Legislation and where the Data Subject has given written consent to the Processing.

PRIVACY NOTICE — ENGLISH TRANSLATION, PART 3

Translation of pages 5–7 of the original Hungarian Privacy Notice. Sections 3.4 and 4.1–4.5.

3.4. Rules for determining the duration of data processing

As a general rule, our Company deletes all personal data:

(a) where the purpose of processing has ceased;

(b) where the sole legal basis for processing is the consent of the data subject (for example, you), and the data subject has withdrawn that consent;

(c) for which there is no statutory legal basis for processing;

(d) which are not necessary to fulfil obligations prescribed by law;

(e) which are not necessary to pursue the vital or legitimate interests of our Company (subject to the restrictions described above).

4. Individual data processing activities

Our Company may process your data for the purposes set out below. For each purpose, we also specify the legal basis for processing, the categories of data processed and the duration of processing.

We note at the outset that, in the case of natural-person contact persons of legal entities, we consider the legitimate interest of the Controller to be the legal basis for our processing, irrespective of the legal basis specified below.

4.1. Contacting our Company

Categories of data processed: Name, telephone number, email address, postal address, ……; in the case of a legal entity, the name, telephone number and email address of its natural-person contact person.

Legal basis for processing: Your consent.

Purpose of processing: The listed data are necessary for us to respond to you.

Source of the data: You provide the data as the person requesting contact.

Retention period: The processed data are deleted after we have contacted you, provided that no further processing as described below takes place.

Possible consequence of refusing to provide data: You will not be able to contact our Company.

4.2. Providing individual offers to persons interested in our Company’s products and services

Categories of data processed: Name, telephone number, email address, postal address; in the case of a legal entity, the name, telephone number and email address of its natural-person contact person.

Legal basis for processing: Processing is necessary in order to take steps prior to entering into a contract.

Purpose of processing: Sending you a commercial offer in response to your request for a quotation.

Source of the data: You provide the data as the person requesting the quotation.

Retention period: The data are deleted after the period during which the offer is binding has expired, if the offer is not followed by a contract.

Possible consequence of refusing to provide data: We will not be able to provide you with an offer.

4.3. Entering into a contract with our Company or placing an order

Categories of data processed: For a legal-entity customer, the name and contact details of the natural-person contact person; for a sole trader, their identification number and tax number, and contact details (postal address, email, telephone number); data relating to payment for the service/product (e.g. amount, date, period of validity).

Legal basis for processing: Taking steps necessary to enter into a contract, and compliance with a legal obligation, since the accounting legislation in force requires us to retain contracts.

Purpose of processing: Entering into a contract with you or accepting an order placed by you.

Source of the data: You provide the data as the contracting party/customer.

Retention period: The above data are deleted after the period prescribed by the accounting legislation in force at the relevant time (at the date of issue of this Notice, eight years following termination of the contract). The contact details of an individual customer and, for a legal-entity customer, those of its natural-person contact person may be deleted upon request after performance of the contract, provided that the customer has also fulfilled all its obligations. If no contract is concluded, the collected data are deleted after expiry of the period during which the offer is binding.

Possible consequence of refusing to provide data: We will not be able to enter into a contract with you or accept your order.

4.4. Performance of a contract concluded with our Company

This includes home delivery of an ordered product or its delivery to you by other means; provision of the ordered service to you; performance of support tasks in the case of product support; and similar activities.

Categories of data processed: For a legal-entity customer, the name and contact details of the natural-person contact person; for a sole trader, their identification number and tax number, and contact details (postal address, email, telephone number); data relating to payment for the service/product (e.g. amount, date, period of validity).

Legal basis for processing: Processing is necessary for the performance of the contract/order.

Purpose of processing: Performance of the contract/order.

Source of the data: You provide the data as the contracting party/customer.

Retention period: The above data are deleted after the period prescribed by the accounting legislation in force at the relevant time (at the date of issue of this Notice, eight years following termination of the contract). The contact details of an individual customer and, for a legal-entity customer, those of its natural-person contact person may be deleted upon request after performance of the contract, provided that the customer has also fulfilled all its obligations.

Possible consequence of refusing to provide data: We will not be able to fulfil our contractual obligations or perform the order.

4.5. Operation of our Company’s customer/partner records system

Categories of data processed: For a legal-entity customer, the name and contact details of the natural-person contact person; for a sole trader, their identification number and tax number, and contact details (postal address, email, telephone number); data relating to payment for the service/product (e.g. amount, date, period of validity).

Legal basis for processing: Our Company’s legitimate interest in maintaining its ability to operate and the quality of its services, the latter also being in the legitimate interests of customers.

Purpose of processing: The customer records system is intended to facilitate performance of contracts, easy access to contact information for customers and partners and, where you have given separate consent, the sending of marketing communications.

Source of the data: You provide the data as a customer or partner.

Retention period: The above data are deleted after the period prescribed by the accounting legislation in force at the relevant time (at the date of issue of this Notice, eight years following termination of the contract). The contact details of an individual customer and, for a legal-entity customer, those of its natural-person contact person may be deleted upon request after performance of the contract, provided that the customer has also fulfilled all its obligations.

Possible consequence of refusing to provide data: Not applicable.

Translator’s note: The dotted placeholder in section 4.1 and irregularities in the source wording have been retained rather than silently completed.

PRIVACY NOTICE — ENGLISH TRANSLATION, PART 4

Translation of pages 8–10 of the original Hungarian Privacy Notice. Section 4.10 continues on the following source page.

4.6. Contact with our Company’s suppliers

Categories of data processed

Identification data (e.g. the name of a sole trader or agricultural producer, registration number used for identification, tax number); contact details (mailing address, email address and telephone number); in the case of a legal entity, the name and the above contact details of its individual contact person; payment information (e.g. bank account number and name of the account-holding bank).

Legal basis for processing

On the one hand, processing is necessary for performance of a contract (e.g. payment); on the other hand, it is necessary to comply with a legal obligation, as applicable accounting legislation requires us to retain contracts.

Purpose of processing

To perform our contractual obligations (payment and other obligations) and to comply with accounting legislation.

Source of data

You provide the data as a supplier partner.

Retention period

The above data will be deleted after the period prescribed by accounting legislation in force at the relevant time (at the date of issue of this Notice, eight years following termination of the contractual relationship / placement of an individual order). Contact details of sole traders and the names and contact details of individual contact persons of legal entities may be deleted at their request after performance of the contract, provided that the supplier has also fulfilled all its obligations.

Possible consequences of refusing to provide data

No contract will be concluded with the supplier.

4.7. Redirecting the user to the payment service provider’s website

To pay the fee, you will be redirected to the website of a payment service provider.

Categories of data processed

The Controller does not process the data provided when registering on the payment service provider’s website. Our Company sends the following information to the payment service provider: the amount to be credited; and the frequency / due date of recurring credits. The payment service provider returns a URL to our Company, to which we redirect you and where you can make payment. Following the payment transaction, the Controller is notified whether payment was successful and of the parameters set for payment renewal. The payment service provider sends the Controller the following data: customer and contract identifier; legal basis/description and amount of the payment; and, if payment failed, information about that failure.

Legal basis for processing

Your consent, given by entering the payment service provider’s website.

Purpose of processing

Processing the payment.

Source of data

You provide your data on the payment service provider’s website.

Retention period

Recurring payment may be cancelled either with the Controller or on the payment service provider’s website. Following cancellation, our Company deletes the Personal Data after expiry of the periods prescribed by tax and accounting legislation.

Possible consequences of refusing to provide data

The paid service cannot be used.

4.8. Issuing invoices

Categories of data processed

Name; address broken down by country, postal code, municipality, street/public-area name and house number; email address; billing period; method and date of payment of the fee.

Legal basis for processing

Compliance with a legal obligation.

Purpose of processing

Necessary to ensure compliance with obligations under tax and accounting legislation. The email address is required to send the electronic invoice.

Source of data

You provide the data when first using the paid service and may subsequently modify it in your profile.

Retention period

The above data will be deleted after expiry of the period prescribed by tax and accounting legislation in force at the relevant time (at the date of issue of this Privacy Notice, eight years following termination of the contract). Where the customer is a legal entity, the contact details of its individual contact person may be deleted at that individual’s request after performance of the contract, provided that the customer has fulfilled all its obligations.

Possible consequences of refusing to provide data

The paid service offered by our Company cannot be used.

4.9. Operation of a Facebook page

Categories of data processed

Our Company’s administrators, as Facebook users, can see the list of people who like or follow the page and can view their public profiles by clicking on their names.

Legal basis for processing

By clicking the “Like” or “Follow” button on our Company’s Facebook page, you consent to the publication of our Company’s news and offers on your own news feed.

Purpose of processing

Our Company maintains its own page on the Facebook social networking platform. Processing aims to increase awareness of our Company, publish marketing advertisements and promote prize competitions.

Source of data

The data become accessible to us through your actions (clicking Like or Follow, posting, etc.).

Retention period

When you click the button to unfollow or unlike our Company’s Facebook page, your connection with our Company on the Facebook platform ends.

Possible consequences of refusing to provide data

You will not receive automatic notifications from Facebook about new information published on our page.

Information on Facebook’s own processing of personal data is available in the privacy policies and rules on Facebook’s website, at www.facebook.com or https://www.facebook.com/privacy/explanation. Facebook may continue to process data relating to your activities connected with our Company’s Facebook page even after you have unfollowed our page. Our Company disclaims responsibility for Facebook’s own processing of data concerning your activities in relation to our Company’s Facebook page, as we have no influence over such processing.

4.10. Operation of a YouTube page

Categories of data processed

Our Company’s administrators, as YouTube users, can see the list of people who like or follow the page and can view their public profiles by clicking on their names. If you like or dislike a video, or comment beneath it, our Company can see those actions, and your comments become public.

Legal basis for processing

By clicking the “Subscribe” button on our Company’s YouTube page, the Data Subject consents to the publication of our Company’s news and offers on their own news feed.

Purpose of processing

Our Company maintains its own page on the YouTube social networking platform. Processing aims to increase awareness of our Company, publish marketing advertisements and promote prize competitions.

Source of data

The data become accessible to us through your actions (clicking Like or Follow, posting, etc.).

Retention period

When you click the button to stop following our Company’s YouTube page, your connection with our Company on the YouTube platform ends.

Possible consequences of refusing to provide data

You will not receive automatic notifications from YouTube about new information published on our page.

End of Part 4 — original pages 8–10. Section 4.10 continues on page 11 of the Hungarian original.

PRIVACY NOTICE — ENGLISH TRANSLATION, PART 5

Translation of original Hungarian pages 11–13. Section 4.15 continues on page 14 of the original and will be completed in the next part.

Information on YouTube's own processing of personal data can be found in the privacy principles and policy on Google's website, available at https://policies.google.com/privacy?hl=hu on the date of issue of this Notice. Google (through YouTube) may continue to process data concerning your activities in relation to our Company's YouTube page even after you have unfollowed our page. Our Company disclaims responsibility for YouTube's own processing by Google of data concerning your activities in relation to our Company's YouTube page, as we have no influence over it.

4.11. Operation of the LinkedIn page

Categories of data processed: Our Company's administrators, as LinkedIn users, can view the list of people who like or follow the page and, by clicking on an individual, can view that person's public profile.

Legal basis for processing: By clicking the "Like" button or "Follow" button on our Company's LinkedIn page, you consent to the publication of our Company's news and offers on your own feed.

Purpose of processing: Our Company maintains its own page on the LinkedIn social network. The purpose of processing is to increase awareness of our Company, publish marketing advertisements and promote prize competitions.

Source of data: The data become available to us through your actions (clicking Like, clicking Follow, posting, etc.).

Retention period: When you click the button to unfollow or unlike our Company's LinkedIn page, your connection with our Company on LinkedIn ends.

Possible consequences of refusing to provide data: You will not receive automatic notifications from LinkedIn about new information published on our page there.

Information on LinkedIn's own processing of personal data can be found in the privacy principles and policy on LinkedIn's website, available at https://www.linkedin.com/legal/privacy-policy on the date of issue of this Notice. LinkedIn may continue to process data relating to your activities in connection with our Company's LinkedIn page even after you have unfollowed our page. Our Company disclaims responsibility for LinkedIn's own processing of data concerning your activities in relation to our Company's LinkedIn page, as we have no influence over it.

4.12. Website registration

Certain services on our website are available only after registration.

Categories of data processed: Email address, username, password, name, address, telephone number, email address, shipping and billing details and, if you choose advance bank transfer as the payment method, the name of your account-holding bank and your bank account number. Please note that, in the event of payment by bank card, our system does not process your bank card details; these are entered within the systems of the electronic payment service provider.

Legal basis for processing: Necessary for conclusion of a contract (order).

Purpose of processing: Necessary for conclusion of a contract (order).

Source of data: You provide the data during registration.

Retention period: Until deletion of the registration or withdrawal of consent. If you have already ordered a product/service from our Company before deletion of your registration, we will continue to retain billing-related data in accordance with applicable accounting legislation.

Possible consequences of refusing to provide data: You will not be able to make full use of the services provided by the website.

4.13. Data relating to end users

Categories of data processed: These depend, on the one hand, on the type of service provided by the partner using the Chatbot and, on the other hand, on the data entered by the end user; consequently, the scope of end-user data cannot be predicted with complete certainty. In the case of webshops, for example, typical data may include the name and address of the end-user customer, the name, type and quantity of products ordered, and the time, amount and method of payment, etc.

Legal basis for processing: Consent of the end user, given through use of the Chatbot.

Purpose of processing: Provision of the Chatbot services.

Source of data: The end user provides the Personal Data.

Retention period: Until deletion is requested.

Possible consequences of refusing to provide data: The end user may use or disregard the Chatbot as they wish.

4.14. Website visit data (“cookies”)

Some of the so-called “cookies” stored on the website collect anonymised statistical data, while others are capable of assessing a website visitor’s personal profile. Detailed information on this is available in the relevant notice. Customers are informed about the use of cookies by a clearly visible and readily perceptible notice on our Company’s website, with an adjacent link to the more detailed notice referred to in the above annex. Cookies are placed on your computer when you use the website, and are downloaded and stored by your internet browser. Most commonly used internet browsers accept and allow the downloading and use of cookies by default. However, you can reject or disable cookies by changing your browser settings, and you can also delete cookies already stored on your computer.

Categories of data processed: Some cookies stored on the website collect anonymised statistical data, while others can be used to assess a visitor’s personal profile. Information stored by cookies may include, among other things, the type of computer device used to visit the website; information about the visitor’s internet browser; information entered by the visitor on the website; advertisements viewed by the visitor; time spent on individual subpages; browsing data; exits; etc. Detailed information is available in the relevant notice.

Legal basis for processing: Your consent.

Purpose of processing: Some cookies are necessary for the website to function properly; others collect anonymised statistical data; and some collect data suitable for compiling a personal profile.

Source of data: Cookies collect the data based on your habits and transmit them to us.

Retention period: Cookies are automatically deleted 13 (thirteen) months after they are downloaded. They can also be manually deleted from the browser; further information is provided in the cookie notice.

Possible consequences of refusing to provide data: You will not be able to make full use of the services provided by the website.

4.15. Processing of personal data in connection with newsletters

Please note that the following do not constitute newsletters: where processing of an email address primarily serves to identify the data subject, for example during registration, when placing an order or making payment, or where it serves communication in connection with fulfilling orders or using services. In addition, if the services provided by our Company or the General Terms and Conditions change, our Company may in certain cases inform recipients of those changes electronically, by email.

Categories of data processed: Email address and name.

Legal basis for processing: Your consent.

Purpose of processing: To notify you of our business offers, i.e. to send you marketing messages by email.

Source of data: You provide the data.

Retention period (continues on next source page): Until consent is withdrawn, but for no longer than five years. If you have another relationship with us in addition to receiving newsletters (e.g. you previously ordered a product from us), then, if you unsubscribe from the newsletter, we will continue to process your data (due to accounting legislation),

PRIVACY NOTICE — ENGLISH TRANSLATION, PART 6

Translation of original Hungarian pages 14–16. Section 8 continues on the next page of the original.

4.15. Processing of personal data in connection with newsletters (continued)

We will cease sending you further newsletters. Unsubscribing from the newsletter will not be interpreted as a request to cancel your webshop registration as well. If that is your intention, please indicate it separately in our system or through the contact details provided above. For technical reasons, we undertake to register the withdrawal of individual consents or unsubscribing within 15 days.

Possible consequences of refusing to provide data: We will not be able to send you information about our favourable offers and promotions.

4.16. Satisfaction surveys

Categories of data processed: Identification data (e.g. name, customer identifier, etc.); contact details (postal address, email, telephone number); in the case of a customer that is a legal entity, the name and contact details specified above of the natural-person contact; and the date on which the service was used or the product purchased.

Legal basis for processing: Your consent, given by completing the satisfaction survey questionnaire.

Purpose of processing: We may contact you with satisfaction survey questionnaires for the purpose of continuously improving our services.

Source of data: You provide the data.

Retention period: Our Company deletes the data within five years after the questionnaire is collected. Our Company may continue to use the opinions received, and any associated data provided that cannot be traced back to or linked to the particular customer, for statistical purposes.

Possible consequences of refusing to provide data: You will not be able to tell us your opinion of our services.

4.17. Complaint handling

Categories of data processed: Identification data (e.g. name, customer identifier, etc.); contact details (postal address, email, telephone number); in the case of a customer that is a legal entity, the name and contact details specified above of the natural-person contact; the date on which the service was used or the product purchased; the subject of the complaint; and the measures we have taken in relation to it.

Legal basis for processing: You voluntarily provide the information contained in the complaint. Thereafter, however, retention of the complaint documentation is a statutory obligation imposed on our Company by Section 17/A of Act CLV of 1997 on Consumer Protection.

Purpose of processing: Complaint handling.

Source of data: You provide the data; in investigating the complaint, our Company also reviews the data concerned. The response to the complaint written by our Company originates from us as a source of data.

Retention period: Our Company deletes the data three years after the complaint has been investigated. Thereafter, our Company may continue to use the opinions received and any associated data that cannot be traced back to the data subject or linked to the customer for statistical purposes.

Possible consequences of refusing to provide data: You will not be able to submit a complaint to our Company.

4.18. Artificial intelligence

Our Company uses a subcontractor to provide the technical infrastructure which, according to the information supplied by that subcontractor, does not use the data entered into the large language models underlying the service

for further training of those models. We nevertheless draw users' attention to the fact that the Data Controller has no substantive means of verifying this circumstance; it can only check the contractual terms of the technical service provider which provide for this circumstance.

5. Processing operations and persons authorised to access data

Processing operations may include: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure and destruction.

Individual processing operations may be performed, and the data may be accessed, by persons whose job duties include the related activity. Our Company's employees are entitled to access your Personal Data only to the extent necessary to perform their duties and are subject to confidentiality obligations.

The data may also be accessed by certain employees of Data Processors and by persons to whom your Personal Data are transferred on the basis of the data subject's (for example, your) consent or a provision of law.

6. Data transfers

A data transfer means disclosing data to or making them accessible to a third party (see the definition of Recipient in the definitions section).

Our Company discloses or transfers Personal Data only under the conditions and to the extent permitted by Data Protection Legislation. Personal Data may be transferred where:

• you have consented (e.g. a transfer for marketing purposes); or • this is necessary for the performance of a contract concluded or to be concluded with you; or • Data Protection Legislation permits or requires it (e.g. responding to requests from supervisory authorities, courts or the police); or • in limited circumstances, our Company's legitimate interests permit it (e.g. legal enforcement of claims; a security service in connection with camera surveillance; or an operator of an electronic access-control or remote monitoring system).

Transfers of data outside the European Union

We inform you that your Personal Data are transferred outside the territory of the European Union, in particular to Canada in all cases. With respect to Canada, the European Commission has adopted a so-called "adequacy decision", meaning that, in the European Commission's assessment, the legal framework applicable in Canada to the protection of Personal Data is adequate.

Our subcontractors use cloud service providers whose servers are primarily located in the EU. Nevertheless, depending on the artificial intelligence or cloud service underlying the relevant service, transfers to the United States or another country outside the EU cannot be completely excluded. To safeguard the Personal Data transferred, Standard Contractual Clauses in the form prescribed by the European Commission have therefore been concluded with the subcontractor concerned.

7. Data Processors

Our Company is entitled to engage a Data Processor and to disclose data to that processor. We inform you that Data Protection Legislation does not make the disclosure of data for processing, or the engagement of a Data Processor, conditional on prior consent, but requires that data subjects be informed. A Data Processor may not make substantive decisions concerning processing; it may process Personal Data coming to its knowledge solely as a technical task and in accordance with our Company's instructions. It may not process data for its own purposes and must store and retain Personal Data in accordance with our Company's instructions.

The group of Data Processors may change. A list of them can be found in the annex.

8. Data security (continues in the next part)

Data are stored and processed at our Company’s registered office or premises. In the case of activities involving processing by a Data Processor, the data may be processed at the registered office or premises of that processor rather than at the locations named above.

Our Company implements appropriate technical and organisational measures to ensure an appropriate level of data security, including, where applicable:

• ensuring the ongoing confidentiality of systems and services used to process Personal Data (that is, protection against unauthorised access); • their integrity (protection against unauthorised alteration); • their availability (the data are accessible to authorised persons); and • their resilience.

PRIVACY NOTICE — ENGLISH TRANSLATION

Part 7 — Source pages 17–19 of 24
Continuation of Section 8 and Section 9 (data subject rights).

— the authenticity, accuracy and up-to-date status of the data.

Our Company ensures that the systems used for processing data are capable, in the event of a physical or technical incident, of restoring access to Personal Data and the availability of such data in a timely manner. Our Company regularly reviews its data security measures.

To protect Personal Data, our Company ensures the security of Data Processing through internal regulatory, organisational, technical and training measures.

Our Company applies IT security technologies and procedures, such as secure access controls, access-rights management systems limiting individual employees' access rights to what is necessary for their work, computer identifiers, passwords, screen protection, logging and similar measures.

Filtering software is used to protect against IT risks (e.g. phishing emails, viruses, spyware, etc.). IT systems are protected by firewalls. Devices containing Personal Data are password-protected and subject to strict inventory controls.

In cooperating with Data Processors, our Company also takes data security requirements into account. Accordingly, contracts concluded with them contain safeguards relating to the security of Data Processing, including technical and organisational requirements and confidentiality obligations imposed on the Data Processor's employees. For the same purpose, a Data Processor may engage a further Data Processor only with our Company's prior authorisation.

Please note that data transmission over the internet cannot be regarded as completely secure. Our Company therefore cannot assume full responsibility for data transmission through its website.

If you register on our website, please keep your website username and password secure and do not share them with anyone.

If your details change, please notify our Company within 8 days, as we can provide our services to you at the appropriate standard only if you do so.

9. Your rights and options for enforcing your rights

9.1. General rules concerning the rights of data subjects (including you)

You may contact our Company at any time with the types of requests described below. We will inform you of our position or any measures taken within 25 days of receiving your request.

If our Company does not agree with your request, it will inform you of its position and the available legal remedies no later than 25 days after receiving the request.

Our Company handles the following types of requests free of charge. If your request is manifestly unfounded or excessive, particularly because of its repetitive nature, our Company may charge a reasonable fee, taking administrative costs into account.

If our Company has reasonable doubts about the identity of the person submitting a request, we may request additional information to establish the applicant's identity beyond doubt.

9.2. Your individual rights

Right of access (also known as the right to information)

You have the right to obtain confirmation from our Company as to whether it processes your Personal Data and, where it does, to receive the following information:

a) the purposes of Data Processing;

b) the categories of Personal Data processed;

c) the recipients or categories of recipients to whom the Personal Data are disclosed (or may be disclosed);

d) the envisaged period for which the Personal Data will be stored;

e) your rights to request rectification, erasure or restriction of processing of Personal Data concerning you and to object to such processing;

f) the right to lodge a complaint with a supervisory authority;

g) where the data were not collected from you, any available information about their source;

h) where our Company uses such procedures, information about automated decision-making or profiling and the likely consequences of such Data Processing for you.

Where Personal Data are transferred to a country outside the European Union or to an international organisation, you have the right to be informed of the appropriate safeguards protecting the security of the transfer.

Upon request, our Company will provide you with a copy of the Personal Data concerning you that it processes. If you submitted the request electronically, we will provide the information in electronic form unless you request otherwise.

Right to rectification

You have the right to request that our Company rectify or complete Personal Data concerning you.

Right to withdraw consent

Where Data Processing is based on your consent, you have the right to withdraw that consent at any time. Please note that if Data Processing also has a legal basis other than consent, withdrawing consent will not result in the cessation of Data Processing. Withdrawal of consent does not affect the lawfulness of Data Processing carried out before the withdrawal.

Right to erasure

You have the right to request that our Company erase Personal Data concerning you in the following cases:

a) the Personal Data are no longer necessary for the purpose for which they were collected;

b) you withdraw the consent on which Data Processing is based and there is no other legal basis for the processing;

c) you object to Data Processing based on legitimate interests and there are no overriding legitimate grounds for the processing;

d) you object to the processing of Personal Data for marketing purposes;

e) your Personal Data have been processed unlawfully;

f) the Personal Data must be erased to comply with a legal obligation under Data Protection Legislation applicable to our Company;

g) the Personal Data were collected in connection with the offer of information society services to persons under the age of 16.

Our Company is not required to comply with an erasure request where Data Processing is necessary:

i. for exercising the right to freedom of expression and information;

ii. because legislation governing Data Processing requires our Company to process the Personal Data;

iii. for reasons of public interest in the area of public health as specified in the GDPR;

iv. for archiving in the public interest, scientific or historical research purposes or statistical purposes; or

v. for the establishment, exercise or defence of legal claims.

Right to be forgotten

If, on the grounds described above, our Company is required to erase any of your Personal Data at your request, we will take reasonably expected steps to inform other Data Controllers processing your data that you have requested the erasure of links to the Personal Data concerned or copies of those Personal Data.

Right to restriction of processing

You may request that our Company restrict Data Processing in the following cases:

a) you contest the accuracy of the Personal Data, in which case the restriction applies for a period enabling our Company to verify their accuracy;

b) the Data Processing is unlawful, but you oppose erasure and request restriction of use instead;

c) our Company no longer wishes to process your Personal Data, but you require continued processing to establish, exercise or defend a legal claim; or

d) you have objected to Data Processing based on legitimate interests, pending verification of whether our Company’s legitimate grounds override yours.

Where Data Processing is restricted, the Personal Data may, with the exception of storage, be processed only with your consent, for the establishment, exercise or defence of legal claims, for the protection of the rights of another person, or for reasons of important public interest of the European Union or a Member State.

Right to data portability

You may request that Personal Data which you have provided to our Company be provided to you in a commonly used, machine-readable format, and you have the right to have those data transmitted to another Data Controller, where:

a) Data Processing is based on your consent or is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into a contract; and

b) Data Processing is carried out by automated means.

Right to object

You have the right to object to the processing of your Personal Data where Data Processing is based on our Company’s legitimate interests, including profiling.

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In this case, our company may continue to process Personal Data only if it demonstrates that the Processing is justified by grounds that override your interests or those of another Data Subject, or that relate to the establishment, exercise or defence of legal claims.

Where Personal Data are processed for direct marketing purposes, you have the right to object to the processing of your Personal Data for such purposes. In that case, the Personal Data may no longer be processed for those purposes.

Right relating to automated decision-making

Where a procedure based on automated data processing is being carried out by our company, you have the right to:

• receive information about the potential effects of that procedure on you;
• request that our company have a human being perform the operation concerning you instead of making an automated decision;
• lodge an objection to automated decision-making.

This right shall not apply where the decision:

(a) is necessary for entering into, or performing, a contract between you and our company;
(b) is authorised by Data Protection Legislation applicable to our company which also lays down suitable measures to safeguard your legitimate interests; or
(c) is based on your explicit consent.

9.3. Remedies available to the Data Subject

If our company rejects your request concerning the rights described above and you disagree with that decision, or if our company fails to comply with the deadline specified for exercising your rights, you, as the Data Subject, may bring the matter before a court.

Data protection lawsuits fall within the jurisdiction of the regional courts. At your choice, proceedings may also be commenced before the court competent for your place of residence or place of stay.

Compensation and damages for infringement of personality rights

Our company shall compensate for damage caused to another person by unlawful data processing or by a breach of data security requirements. If your personality rights are infringed, you may claim damages for non-material harm. Our company shall also be liable for damage caused by a Data Processor.

Our company shall be exempt from liability if the damage was caused by an unavoidable event beyond the scope of the Processing. Our company shall not be required to compensate for damage, and no damages for non-material harm may be claimed, to the extent that the damage or infringement of personality rights resulted from your intentional or grossly negligent conduct.

You may also initiate proceedings before the data protection authority:

Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság)

1055 Budapest, Falk Miksa utca 9–11, Hungary
Postal address: 1374 Budapest, P.O. Box 603
Email: ugyfelszolgalat@naih.hu
Telephone: +36 1 391 1400
Fax: +36 1 391 1410

Foreign nationals may also lodge a complaint with the supervisory authority competent for their place of residence.

We recommend that, before initiating proceedings before an authority or court, you make use of the opportunity to lodge an objection or complaint with our company.

Amendments to the Privacy Notice

Our company reserves the right to amend this Privacy Notice and shall inform Data Subjects of any such amendments in an appropriate manner.

Annexes

1. List of Data Processors and other recipients
2. List of the principal laws relating to data processing

Annex 1: List of Data Processors and other recipients

1. Technical infrastructure services

Activity performed by the Data Processor: Provision of the technical infrastructure underlying the chatbot.
Name of Data Processor: Envision Labs Inc.
Registered office: A4-9131 Keele St, Vaughan, ON, L4K 0G7, Canada
Postal address: A4-9131 Keele St, Vaughan, ON, L4K 0G7, Canada
Email: support@chatling.ai
Privacy notice: https://chatling.ai/privacy-policy

Categories of data processed: All Personal Data provided by the Data Subject.
Categories of Data Subjects: All Data Subjects using the Chatbot.
Purpose of Processing: To make the service available to the Data Subject and ensure its proper operation.
Duration of Processing and deadline for deletion: As described in the Privacy Notice referred to above.

2. Invoicing and inventory management software

Activity performed by the Data Processor: Provision of invoicing software.
Name of Data Processor: …….
Registered office: ……..
Company registration number: ……
Postal address: ……..
Email: ……..
Telephone: +……..
Website: ……..

Privacy notice of …… Kft.: ……

Fact of Processing and categories of data processed: Data required to issue an invoice (the Data Subject's invoicing and postal name and address, and the email address to which the invoice is sent).
Categories of Data Subjects: Persons placing orders in the online store.
Purpose of Processing: Issuing invoices.
Duration of Processing and deadline for deletion: In accordance with Section 169(2) of Act C of 2000 on Accounting, data required for invoicing must be retained for eight years following the order.

3. Bookkeeping

Activity performed by the Data Processor: Bookkeeping.
Name of Data Processor: …….
Registered office: ……
Company registration number: ……
Postal address: ……
Email: ……
Telephone: +……
Website: ……
Privacy notice of …… Kft.: ……

Categories of data processed: All data contained in accounting documents.
Categories of Data Subjects: The Data Controller's customers, business partners and suppliers.
Purpose of Processing: Compliance with accounting legislation.
Duration of Processing and deadline for deletion: In accordance with Section 169(2) of Act C of 2000 on Accounting, data required for invoicing must be retained for eight years following the order.

Annex 2: List of the principal laws relating to data processing (non-exhaustive)

• GDPR: 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).

• Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.).

• Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Grt.).

• Act CXIX of 1995 on the Processing of Name and Address Data for Research and Direct Marketing Purposes (Katv.).

• Act C of 2000 on Accounting.

• Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services.

• Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers.

• Act CLV of 1997 on Consumer Protection.

• Act C of 2003 on Electronic Communications.

Translator’s note: Blank dotted fields in the source document have been retained as placeholders; no missing company details have been supplied.

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Annex 2: List of the principal laws relating to data processing (continued)

• Act XX of 1996 on Identification Methods Replacing the Personal Identification Number and the Use of Identification Codes.

• Act LXVI of 1992 on the Registration of Citizens’ Personal Data and Addresses.

• Act CXXXIII of 2005 on the Rules of Personal and Property Protection Activities and Private Investigation Activities (Szvtv.).

• Government Decree No. 45/2014 (II. 26.) on the Detailed Rules of Contracts between Consumers and Businesses.

• Act XLI of 1991 on Notaries Public (Section 112 concerns the content of the enforcement clause).

Annex No. .....

Legitimate Interests Assessment concerning .....

Translator’s note: The dotted placeholders above appear in the original Hungarian document and have been preserved. Original page 24 contains no substantive text.