

PRIVACY NOTICE FOR THE CONTACT PERSONS OF BUSINESS PARTNERS

The date of entry into force of this Privacy Notice: 02.11.2021

Controller's name: **KELER Central Depository Ltd.** (hereinafter: "**Controller**").

Detailed information relating to the Controller

Company (institution) name: KELER Central Depository Ltd.

Registered office: H-1074 Budapest, Rákóczi út 70-72.

Email: keler@keler.hu

Website: <https://www.keler.hu>

Name and email address of the Data Protection Officer:

Dr. András Balázs Bordás, adatvedelmitisztviselo@keler.hu

Regarding the processing of your personal data the Controller hereby informs you (hereinafter: "**You**" or "**Data Subject**") of the principles and practices applied by it during the processing of such personal data and of your rights related to processing and the method of and opportunities for exercising such rights.

The Controller pays particular attention to the fact that the personal data obtained by it during its operation and thereafter processed by it are processed and stored in accordance with the provisions of 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 (General Data Protection Regulation) (hereinafter: "**Regulation**").

Important information: You may ask for detailed information at any time on the processing of your data and may object to such processing. Additional information on such rights is available below.

We process your data (e.g. name, email address, phone number and less frequently some other data) during the establishment and term of our legal relationship with your employer or client, and to a limited extent before its establishment and after its termination. Detailed information on such processing is available in Annex 1.

1. YOUR RIGHTS AND AVAILABLE LEGAL REMEDIES

In relation to the above processing activities You as a data subject are entitled to the following rights and may enforce such rights as follows:

You are entitled, at any time, to request information regarding the data relating to You and processed by the Controller, to request the rectification, erasure and blocking of your data recorded and have the incomplete data completed, to exercise the right to data portability and of access to your personal data and to object to the processing of your personal data.

You may submit your request for exercising the rights specified in the previous paragraph primarily to the Data Protection Officer.

1.1. INFORMATION AND ACCESS TO PERSONAL DATA

Via the contact details set out in the above section, You may request the following information in writing from the Controller as to the processing performed by it:

- what personal data are processed,
- the legal basis for processing,
- the purpose of processing,
- the source of data,
- the duration of processing,
- to whom, when, based on what law, to which personal data the Controller provided access or to whom it transferred the personal data.

The Controller makes the data available to You in a commonly used electronic format unless You request the data in writing in a printed form. The Controller will not provide verbal information either via phone or in person.

The Controller provides you with the copy of personal data (in person at the Customer Service) free of charge for the first time. For additional copies requested by You, the Controller may charge a reasonable fee based on administrative costs. If You request the copy in electronic format, the Controller will provide You with the information via email in a commonly used electronic format unless otherwise requested by You.

If, after being informed, You do not agree with the processing and the accuracy of the data processed, as per those set out in this Section 1 You are entitled to request the rectification, completion or erasure of the personal data relating to You, the restriction of processing thereof and to object to the processing of such personal data, or to initiate the proceedings set out in Section 1.10.

1.2. THE RIGHT TO RECTIFICATION OF THE PERSONAL DATA PROCESSED AND TO HAVE SUCH DATA COMPLETED

Upon your written request the Controller shall, without undue delay, rectify the inaccurate personal data indicated by You, and complete the incomplete data with the content indicated by You. The Controller shall communicate any rectification or completion of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform You about the data of those recipients if You request it in writing.

1.3. RIGHT TO RESTRICTION OF PROCESSING

By submitting a written request You shall have the right to obtain from the Controller restriction of processing if

- the accuracy of the personal data is contested by You, for a period enabling the Controller to verify the accuracy of the personal data,
- the processing is unlawful and You oppose the erasure of the personal data and request the restriction of their use instead,
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by You for the establishment, exercise or defence of legal claims,
- You object to processing pending the verification whether the legitimate interests of the Controller override your rights to protect your personal data.

Personal data subject to restriction shall, with the exception of storage, only be processed during such period with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. You will be informed by the Controller before the restriction of processing is lifted.

1.4. RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

You shall have the right to obtain from the Controller the erasure of personal data concerning You without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Controller;
- b) You withdraw consent on which the processing is based and where there is no other legal ground for the processing;
- c) You object, on grounds relating to your particular situation, to processing, and there are no overriding legitimate grounds for the processing;

- d) You object to processing of personal data concerning You for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing;
- e) the personal data have been unlawfully processed by the Controller;
- f) the personal data have been collected in relation to the offer of information society services directly to a child.

You shall not be entitled to exercise your right to erasure (“right to be forgotten”) to the extent that processing is necessary

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

1.5. RIGHT TO DATA PORTABILITY

If processing is necessary for performing a contract, or is based on your freely given consent and is carried out by automated means, You shall be entitled to obtain the data provided by You to the Controller in a machine-readable format. You shall have the right to have the personal data transmitted to another controller, where technically feasible. This right shall only apply to personal data disclosed by You; no other data may be transmitted (e.g. statistics, etc.).

You are allowed to:

- receive the personal data concerning You and available in the Controller’s system in a structured, commonly used, machine-readable format,
- to transfer such data to another controller,
- to have the data transmitted directly to another controller, where technically feasible in the Controller’s system.

That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

The Controller fulfils the request for data portability exclusively upon a written request submitted via email or by post. In order to fulfil the request, it is necessary for the Controller to confirm that actually the person entitled to the right wishes to exercise such right. Within the framework of your right to data portability, You may request portability in relation to the data

You provided to the Controller. Exercising the right shall not automatically result in the erasure of the data from the Controller's systems; therefore, You will continue to be registered in the Controller's system even after exercising such right, unless You request the erasure of your data.

1.6. OBJECTION TO THE PROCESSING OF PERSONAL DATA

On grounds relating to your particular situation, You may object to the processing of your personal data by way of a declaration submitted to the Controller if the legal basis for processing is

- public interest as per point (e) of Article (6)1 of the Regulation, or
- legitimate interest as per point (f) of Article (6)1 of the Regulation.

Where personal data are processed for direct marketing purposes, You shall have the right to object at any time to processing of personal data concerning You for such marketing, which includes profiling to the extent that it is related to such direct marketing. In such cases the personal data shall no longer be processed for such purposes.

If the right to object is exercised, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In relation to establishing whether processing is justified by compelling legitimate grounds, the Controller shall make a decision. It shall inform you of its viewpoint in relation thereto in a written opinion.

You shall be entitled to object to processing in writing (via email or by post).

1.7. THE ENFORCEMENT OF RIGHTS OF A DECEASED DATA SUBJECT BY ANOTHER PERSON

Within five years following the death of the data subject, the person authorised by the deceased person to act or by means of a declaration recorded in an authentic instrument or a private document of full probative value shall be entitled to enforce the rights the deceased person was entitled to enjoy during his or her lifetime, such as the right of access, the right to rectification, erasure, restriction of processing, data portability and to object. If the deceased person made several declarations at the Controller, the person indicated in the declaration made at the later date may enforce such rights.

If the deceased person failed to make such a declaration, the rights the deceased person was entitled to enjoy during his or her lifetime and specified in the previous paragraph may be enforced by the data subject's close relative as per the Civil Code of Hungary within five years

following the death of the data subject (if there are several close relatives, the close relative first exercising that right shall be entitled to enforce such rights).

According to point (1) of Section 8:1(1) of the Civil Code of Hungary, the close relative shall mean spouses, direct ascendants, adopted children, stepchildren and foster children, adoptive parents, stepparents, foster parents, brothers and sisters. The close relative of the deceased person shall certify the following:

- the fact and date of the death of the deceased data subject with a death certificate or a court decision, and
- his or her own identity – and if necessary, his or her close relative capacity – with an authentic instrument.

During the enforcement of the rights, in particular during proceedings vis-à-vis the Controller or before the National Authority for Data Protection and Freedom of Information and the court, the person enforcing the deceased person's rights shall have the rights and obligations the deceased person was entitled to and subject to during his or her lifetime pursuant to the Act on Informational Self-Determination and Freedom of Information and the Regulation.

Upon written request, the Controller shall inform the close relative of the measures taken, unless explicitly prohibited by the deceased person in his or her declaration.

1.8. DEADLINE FOR FULFILLING THE REQUEST

The Controller shall provide information on action taken to You without undue delay and in any event within one month of receipt of the request as per Sections 2.1-2.6. That period may be extended by two further months where necessary, taking into account the complexity and the number of the requests, but in such a case, the Controller shall inform You of any such extension within one month following the receipt of the request, together with the reasons for the delay, and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Where requests from You are manifestly unfounded or excessive, in particular because of their repetitive character, for the fulfilment of the request the Controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on your request. The Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where You make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by You.

1.9. COMPENSATION AND TORT

Any person who has suffered material or non-material damage as a result of an infringement of the Regulation shall have the right to receive compensation from the Controller and/or processor for the damage suffered. The processor shall be liable for the damage caused by processing only where it has not complied with obligations of the Regulation specifically directed to processors or where it has acted outside or contrary to lawful instructions of the Controller. The Controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

1.10. POSSIBILITIES TO ENFORCE RIGHTS

You may exercise your rights in a written request sent via email or by post.

You cannot enforce your rights if the Controller demonstrates that it is not in a position to identify You. Where requests from You are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may charge a reasonable fee for the fulfilment of the request or refuse to act on the request. The Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request. Where the Controller has doubts concerning the identity of the natural person making the request, the Controller may request the provision of additional information necessary to confirm the identity of the person making the request.

Based on the Act on Informational Self-Determination and Freedom of Information, the Regulation and the Civil Code of Hungary (Act V of 2013), You

- a) may lodge a complaint with or submit a request to the National Authority for Data Protection and Freedom of Information (H-1055 Budapest, Falk Miksa utca 9-11; <https://www.naih.hu>),
OR
- b) may enforce your rights before the court. An action may be brought, at your choice, before the regional court based on your place of residence (the list and contact details of regional courts are available via the following link: <https://birosag.hu/torvenyszekek>).

2. MANAGEMENT OF PERSONAL DATA BREACHES

Personal data breach means 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. The Controller shall keep a record for the purpose of checking the measures related to personal data breaches, providing information to the supervisory

authority and You; the record shall include the personal data concerned, the data subjects and their number, the date and time, the circumstances and the effects of the breach as well as the measures taken to eliminate such breach.

In the case of a personal data breach, the Controller shall, without undue delay but not later than 72 hours, notify the personal data breach to the supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. When the personal data breach is likely to result in a high risk to your rights and freedoms, the Controller shall communicate the personal data breach to You without undue delay.

3. ACCESS TO DATA AND DATA SECURITY MEASURES, DATA TRANSFER

3.1. ACCESS TO DATA, DATA TRANSFER

The personal data are accessible to a strictly limited number of the Controller's employees and particular agents for the purpose of performing their tasks.

The Controller shall only provide the personal data processed by it to other bodies and public bodies in ways and for the purposes specified by law.

The Controller informs You that the court, the prosecutor, the investigation authority, the authority dealing with administrative offences, the administrative authority, the National Authority for Data Protection and Freedom of Information, or in accordance with statutory authorisation, other bodies may request the Controller to provide information, disclose or hand over data, or make documents available.

The Controller shall disclose personal data to the authorities, if the authority indicated the exact purpose and the set of data, in the quantity and to the extent absolutely essential to achieve the purpose of the request.

3.2. DATA SECURITY MEASURES

The Controller shall take every reasonable measure to ensure data security and provide an appropriate level of protection in particular against unauthorised access, alteration, transfer, disclosure, erasure or destruction as well as accidental destruction and corruption. The Controller shall ensure data security by applying appropriate technical and organisational measures.

The Controller shall choose and operate the IT devices applied for the processing of personal data during the provision of the service in a manner that:

- the processed data are available to the authorised persons (availability);
- the authenticity and authentication of the processed data are ensured (authenticity of processing);
- the unaltered state of the processed data is verifiable (data integrity);
- the processed data are protected against unauthorised access (data confidentiality).

During processing the Controller shall maintain

- confidentiality: it shall protect the information so that only the authorised persons may have access thereto;
- integrity: it shall protect the accuracy and completeness of the information and the processing method;
- availability: it shall ensure that when it is necessary for the authorised user, the desired information is actually accessible and the related tools are available.

In order to ensure compliance with the above requirements, the Controller shall, from time to time, make backups of the data available in its system, including your personal data. The legal basis for this processing activity is the Controller's legitimate interest, i.e. data recovery in the case of any data loss. Additional details are available in the Controller's Regulation on backup. Further information may be requested via the adatvedelmitisztviselo@keler.hu email address.

The protection of personal data is further ensured by the fact that the Controller engages a data protection officer who is accountable to the Controller's senior management and shall not act under the instruction of any person when performing his or her tasks.

Where processing is to be carried out on behalf of the Controller, the Controller shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the requirements of the Regulation will be met and the protection of your rights will be ensured.

4. MISCELLANEOUS PROVISIONS

The Controller reserves the right to unilaterally modify this Privacy Notice. If any change is made regarding the content of the Privacy Notice, the Controller shall notify You thereof by disclosing the modification on the Controller's website and indicating the date of entry into force of the new Privacy Notice.

If you provided the data of another natural person or fictitious data to the Controller and caused any damage thereby, the Controller shall be entitled to enforce its claim for compensation against You.

The Controller does not check the personal data provided to it. Exclusively the person providing the data shall be responsible for the accuracy thereof. Upon the provision of your personal data,

You assume responsibility for the fact that the provided data are true and that those are your own personal data.

Annex 1

DATA PROCESSING SITUATIONS

1. PROCESSING RELATED TO SUPPLIER RELATIONS (CONCLUSION OF A CONTRACT WITH THE SUCCESSFUL BIDDER, PERFORMANCE OF THE CONTRACT)

Processed data: the Controller processes the name, signature and specimen signature of the person entitled to represent the supplier as well as the name, phone number, position and email address of the contact persons and employees. The (company) name, registered office, bank account number and tax number of the represented organisation as well as any other data in relation to the performance of the contract. The above personal data may also be processed during the performance of the contract.

The purpose of processing: concluding a contract with the selected supplier, and performing the contract.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): economic interest in concluding contracts and performing the administration of performance.

Duration of processing: retention period as per the Document Management Policy, which shall commence as follows:

in relation to the exercise of civil-law claims and fulfilment of obligations, it shall be five years following the termination of the contractual relationship with the partner company (Section 6.22(1) of the Civil Code).

If the processing of your data is required for performing the tax obligations the Controller is subject to, the data shall be processed for five years following the last day of the calendar year in which tax return, data report or report on tax should have been prepared or in the lack of tax return, data report or report, the tax should have been paid (Sections 78(3) and 202(1) of the Act on the Rules of Taxation).

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data, but in many cases your data are provided by the employees of your company or your superior. Consequence of the failure to provide data: the contract will not be concluded, there will be obstacles to performing the contract.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the co-worker of the bidder.

Recipients, categories of recipients if there is data transfer: the data are not disclosed to third-party recipients; however, the Controller shall not refuse to hand over the documents created during the procurement procedures in the course of inspections or controls by any authority, the supervisory body or the owners. Within the framework thereof, personal data may be transferred to third parties based on its statutory obligation.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: Care All Kft. (Andoc), Microsoft (SharePoint).

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in continuously performing the administration of the conclusion and performance of contracts as well as in the related communication. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

2. PROCESSING RELATED TO SUPPLIER RECORD AND THE CONTACT PERSONS OF SUPPLIERS

Processed data: the Controller keeps a record of its existing and potential suppliers in order to ensure their uniform registration and classification. The following personal data are processed concerning the given suppliers: name, signature and specimen signature of the person entitled to represent the supplier as well as the name, phone number, position and email address of the contact persons and employees.

The purpose of processing: maintaining an up-to-date database of the Controller's suppliers. Performing procurement procedures.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): economic interest in keeping contact with the suppliers and ensuring continuous supplier availability.

Duration of processing: we will process your data until your employer is regarded as a potential supplier or until you are employed/contracted by the company regarded as a potential supplier.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of the failure to perform processing: your company cannot be regarded as a potential supplier.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): your co-worker/superior at the supplier company.

Recipients, categories of recipients if there is data transfer: the data are not transferred to third-party recipients.

The Controller does not engage processors in the processing. However, the Controller shall not refuse to hand over the documents created during procurement procedures in the course of inspections or controls by any authority, the supervisory body or the owners. Within the framework thereof, personal data may be transferred to third parties based on its statutory obligation.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping contact with the suppliers and ensuring continuous supplier availability. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

3. PROCESSING RELATED TO THE ENTERING OF EXTERNAL WORKERS OUTSIDE NORMAL WORKING HOURS

Processed data: name, company and photo ID number of external workers, intended start and end date and time of the work.

The purpose of processing: allowing entering.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): the Controller's security-related interest in the protection of the facility.

Duration of processing: until the end of the calendar year following the year of entering the facilities.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of failing to provide data: You will not be allowed to enter the Controller's facilities outside normal working hours.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the co-worker of external persons entering the facilities (company contact person) (e.g. in the case of maintenance work, the data of the maintenance staff are sent by the company contact person in advance).

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: Reception service (FAKULTÁS FM Zrt. (registered office: H-5093 Vezensy, Templom utca 1.; Company registration number: 16-10-001836))

4. PROCESSING RELATED TO THE CYBERARK PSM SYSTEM, THE RECORDING OF FULL USER ACTIVITY IN THE CASE OF EXTERNAL WORKERS

Processed data: the activities of external workers (not the Controller's employees) in the IT system are continuously recorded (logged) by the Controller. The data processed include user-related events (user ID, IP address, activity).

The purpose of processing: the protection of the IT system, protection of payment, banking and securities secrets, protection of property, and to this end, the monitorability of users.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets and protection of property.

Duration of processing: five years following data recording.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged to provide data. Consequence of the failure to provide data: withdrawal of rights, refusing remote access.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): not applicable.

Recipients, categories of recipients if there is data transfer: in the case of requests by authorities.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: support company on an ad hoc basis if troubleshooting is performed in the system concerned.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in protecting payment, banking and securities secrets and in protecting property. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

5. PROCESSING RELATED TO THE PERSONAL DATA OF EXTERNAL WORKERS WITH PERMANENT ACCESS CARDS; BET EMPLOYEES (BECAUSE OF THE DR SITE) AND THE DATA OF GIRO EMPLOYEES (IN OUR ACCESS CONTROL SYSTEM)

Processed data: the following data are necessary for identification to allow entering the Controller's site: name, date and place of birth, mother's name, phone number.

The purpose of processing: the protection of the IT system, protection of payment, banking and securities secrets, protection of property, and to this end, the monitorability of users.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets and protection of property.

Duration of processing: five years following data provision.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the representative of the company forwards the data to the Controller.

Recipients, categories of recipients if there is data transfer: GIRO security service.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: GIRO security service.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in protecting property and the facility. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data,

the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

6. PROCESSING RELATED TO THE STORAGE OF THE DATA OF THE SECURITY SERVICE AND THE ACCESS GROUP FOR STATUTORY CONTROL (RECOMMENDATION BY THE CENTRAL BANK OF HUNGARY (MNB))

Processed data: the personal data of the security service employees concerned (name and other personal identifiers) in the CyberArk and mailing system.

The purpose of processing: the protection of the IT system, protection of payment, banking and securities secrets, protection of property, and to this end, the monitorability of users.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets and protection of property (compliance with MNB Recommendation No. 11/2020 (X.20.) on physical security).

Duration of processing: five years following data provision.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: data provision is based on contract; in the case of the failure to provide data, the Data Subject cannot be delegated to security service.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the representative of the concerned/employer company.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: -

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in protecting the facility and property. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

7. PROCESSING RELATED TO THE DATA OF THE CONTACT PERSONS OF PARTNERS (CONTRACTUAL)

Processed data: name, phone number, email address, position.

The purpose of processing: managing partner relations.

Legal basis for processing: the Controller’s legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): organisational interest in keeping contact with the partners and managing contracts.

Duration of processing: five years following the termination of the contract with the partner.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: -

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): from the leader or other employee of the partner company.

Recipients, categories of recipients if there is data transfer: KPMG Hungária Kft.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: KPMG Hungária Kft.

Additional characteristics of processing:
The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping contact with the partners and managing contracts. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

8. PROCESSING RELATED TO THE OUTLOOK ADDRESS BOOK

Processed data: name, position, mobile phone number, email address.

The purpose of processing: keeping contact.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): keeping contact, ensuring contact via email.

Duration of processing: five years following the termination of the legal relationship with the partner.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: no.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

9. PROCESSING RELATED TO CONFLICT OF INTEREST RULES

Processed data: I. In the case of the executive officer of the organisation performing outsourced activities and the employee of said organisation involved in such activities, assigned experts and executive officers:

if having a securities account: the name of the investment firm or the credit institution, the identifier of securities account(s), the identifier of client accounts, date of opening the account, if having ownership or executive officer status, employment or other legal relationship in a company: the name and company registration number of the company, extent of shareholding interest, personal interest.

II. In the case of the executive officer of the organisation performing outsourced activities and the employee of said organisation involved in such activities, assigned experts and executive officers:

if having the qualified financial instrument defined in the Regulation on Conflict of Interest: name, identifier, date of acquisition and date of sale.

III. In the case of the executive officer of the organisation performing outsourced activities and the employee of said organisation involved in such activities, assigned experts and executive officers:

if having ownership in an investment firm, credit institution, central securities depository and central counterparty: name, company registration number, ownership stake, date of acquisition and date of sale.

The purpose of processing: identifying and handling situations resulting in potential conflict of interest.

Legal basis for processing: legal obligation, point (c) of Article (6)1 of the Regulation.

Article 50 of COMMISSION DELEGATED REGULATION (EU) 2017/392 of 11 November 2016 supplementing Regulation (EU) No 909/2014 of the European Parliament and of the Council with regard to regulatory technical standards on authorisation, supervisory and operational requirements for central securities depositories

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): -

Duration of processing: the termination of the legal relationship with the partner + ten years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: requesting and providing the data are statutory obligations, processing based on law.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): public register, company information database, OPTEN, securities and client account statements.

Recipients, categories of recipients if there is data transfer: MNB (supervisory authority).

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

10. PROCESSING RELATED TO THE OPERATION OF ELECTRONIC MAILING SYSTEM (IN THE CASE OF EXTERNAL WORKERS)

Processed data: email addresses, emails and usernames.

The purpose of processing: operating the mailing system, enabling electronic communication.

Legal basis for processing: the performance of the contract, point (b) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): enabling particular external workers to use the internal mailing system.

Duration of processing: available in an archived form for an unlimited period in MS Exchange.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of the failure to provide data: You cannot perform your work without the use of the email system.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): it may happen that another employee at your company or your superior provides your data to the Controller.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

11. PROCESSING RELATED TO THE ALLOCATION, MODIFICATION AND WITHDRAWAL OF IT AUTHORISATIONS

Processed data: authorisation data, identification data (name, email address).

The purpose of processing: controlled regulation of access to the IT system.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): organisational interest in regulated access to data.

Duration of processing: in the event of the termination of the assignment, the data will become inactive, which shall be maintained for an unlimited period.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, You are obliged to provide data to be able to use the IT system and thus to perform your work.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

12. PROCESSING RELATED TO MS TEAMS

Processed data: email addresses and usernames.

The purpose of processing: operating a collaboration system, enabling electronic communication.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): interest in providing the conditions for group work.

Duration of processing: exclusively during the term of the contract concluded with the partner.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of the failure to provide data: You cannot use the video and audio meeting services of MS Teams.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): your co-worker or superior may also provide your data.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

13. PROCESSING RELATED TO ENTERING THE FACILITY AND THE ACCESS CONTROL SYSTEM (FOR PERSONS WITH PERMANENT ACCESS CARDS; R70)

Processed data: name of the partner company employee and the data relating to movement at the area of the Controller's facility, together with the organisational unit, photo and gender.

The purpose of processing: protection of payment, banking and securities secrets, and protection of property.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets, and protection of property.

Duration of processing: your data will be erased upon termination of the partner contract on which processing is based, while other data related to movement will be erased six months after their generation.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of the failure to provide data: refusal to allow entering the facility.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): from data indicated in contracts or declarations of confidentiality, BET; in the case of GIRO, the contact person in security-related matters. In the case of photos, from SD.

Recipients, categories of recipients if there is data transfer: in individual cases, upon request, to authorities.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: FAKULTÁS FM Zrt. (registered office: H-5093 Vezensy, Templom utca 1.; Company registration number: 16-10-001836) (security company), data entry and viewing; Access Group Kft. (registered office: H-2120 Dunakeszi, Csillag utca 13/2.; Company registration number: 13-09-198866) full access on an ad hoc basis, in the case of defects.

14. PROCESSING NECESSARILY RELATED TO THE SECURITY MONITORING SERVICE AND THE IT LOG ANALYSIS ACTIVITY

Processed data: every significant event of the IT devices included in the log analysis system, events related to the users (user ID, IP address, activity, email address, etc.).

The purpose of processing: monitoring and analysing security events using the central SIEM system, protecting the IT system, protecting payment, banking and securities secrets, protecting property, and to this end, ensuring the monitorability of users.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets, and protection of property.

Duration of processing: five years following data generation.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: if You use any of Controller's IT devices, the processing starts. Consequence: -

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): not applicable in the case of logging.

Recipients, categories of recipients if there is data transfer: we transfer the data only upon request by authorities to the authorities making the request.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: based on the correlation rules in the JSA system, there is an alert when detailed investigation is performed. In such a case the listed data may contain the subject of the investigation.

Processors: support company on an ad hoc basis if troubleshooting is performed in the system concerned.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in the safe and integral operation of its IT systems. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the

legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

15. PROCESSING NECESSARILY RELATED TO ENABLING MOBILE MAILING

Processed data: name of suppliers with mobile mailing access, data of the mobile device (software version, installed applications, device settings, phone number), AD username.

The purpose of processing: enabling electronic mailing on mobile devices, the protection of data and devices by identifying users.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets, and protection of property.

Duration of processing: device data are erased upon termination of the authorisation.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: processing is performed when the mobile devices are used. Consequence of failing to provide data: withdrawal of MDM authorisation.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): mobile phone, name and AD identifier from the IDM system, phone number from the user.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: support company on an ad hoc basis if troubleshooting is performed in the system concerned.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in the operation of the mobile mailing system and providing secure use of the system. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

16. PROCESSING RELATED TO THE MOBILE TERMINAL POINT PROTECTION SERVICE

Processed data: email address, device ID, network used.

The purpose of processing: advanced security protection of mobile devices.

Legal basis for processing: the Controller’s legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets and protection of property.

Duration of processing: device data are erased upon termination of the authorisation.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged. Consequence: withdrawal of MDM authorisation.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): -

Recipients, categories of recipients if there is data transfer: MobileIron Inc., Zimperium Inc.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: yes. To Zimperium (USA) servers. As a processor, MobileIron applies data protection clauses accepted by the Commission.

Is automated decision-making applied?: no.

Processors: FAKULTÁS FM Zrt. (registered office: H-5093 Vezensy, Templom utca 1.; Company registration number: 16-10-001836) security company, MobileIron as processor, Zimperium as subprocessor.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in secure operation of mobile devices. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

17. PROCESSING RELATED TO KEYS

Processed data: name of suppliers and employees, date and time of receiving and returning keys, signature.

The purpose of processing: protection of payment, banking and securities secrets, and protection of property.

Legal basis for processing: the Controller’s legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets, and protection of facility and property.

Duration of processing: one year following data recording.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide your data. Consequence of the failure to provide data: refusal to hand over the key.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): -

Recipients, categories of recipients if there is data transfer: there is no data transfer.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: FAKULTÁS FM Zrt. (registered office: H-5093 Vezsény, Templom utca 1.; Company registration number: 16-10-001836) security company.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in facility protection and the performance of measures taken to that end. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

18. PROCESSING RELATED TO THE STORAGE OF IT AUTHORISATIONS (IN THE CASE OF EXTERNAL WORKERS)

Processed data: name, email address, scope of authorisation.

The purpose of processing: registering authorisations related to the IT system, managing access and establishing accountability.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): organisational interest in keeping an accurate record of authorisations relating to the IT system.

Duration of processing: five years following the termination of the contract with the partner.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, You are obliged to record the IT system-related authorisations necessary for work. Consequence of failing to provide data: You cannot access the system and fulfil your obligations related to your role.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): in the case of external workers, the organisational unit concerned.

Recipients, categories of recipients if there is data transfer to persons other than the processors: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: Innomatrix Services Kft. (registered office: H-2132 Göd, Rózsa utca 27.; Company registration number: 13-09-137359) – support.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping an accurate record of authorisations relating to the IT system. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

19. PROCESSING RELATED TO DECLARATIONS OF CONFIDENTIALITY, DECLARATIONS OF ACKNOWLEDGEMENT /CONTRACTS/ AND CERTIFICATES OF PERFORMANCE

Processed data: as per the content of the document (typically name, company).

The purpose of processing: registering BIM-specific obligations.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets and protection of property.

Duration of processing: period of confidentiality specified in the declaration of confidentiality + five years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged to provide data. Consequence of the failure to provide data: termination of the contract, refusing to provide the permanent entry permit.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the representative of the contractual party.

Recipients, categories of recipients if there is data transfer: there is no data transfer to persons other than the contracting party.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in protecting payment, banking and securities secrets and in protecting property. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

20. PROCESSING RELATED TO PANDEMIC-RELATED PASSWORDS

Processed data: name, username, email address and phone number.

The purpose of processing: necessary for identification if the blocked user client contacts the Helpdesk because of the RSA token or a forgotten password.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): organisational interest in user rights management and user identification during the operation of the system, performed by providing new passwords.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide your data. Consequence of the failure to provide data: You cannot use the system.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in user rights management and user identification during the operation of the system. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

21. PROCESSING RELATED TO THE INSPECTION AND STORAGE OF PERSONAL DATA INCLUDED IN THE CONTRACT PORTFOLIO

Processed data: name, phone number, email address, position.

The purpose of processing: concluding and amending contracts, looking up conditions.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): performance and conclusion of contracts as well as the administration thereof.

Duration of processing: the termination of the contract with the partner + five years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): in many cases the text of the contract includes these data which have been mostly provided by You.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in the performance and conclusion of contracts as well as the administration thereof.

Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

22. PROCESSING RELATED TO THE INSPECTION AND STORAGE (CSDR-BASED SERVICES) OF PERSONAL DATA INCLUDED IN THE CONTRACT PORTFOLIO

Processed data: name, phone number, email address, position.

The purpose of processing: concluding and amending contracts, looking up conditions.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): performance and conclusion of contracts.

Duration of processing: the termination of the contract with the partner + ten years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: -

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): in many cases the text of the contract includes these data which have been mostly provided by You.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in the performance and conclusion of contracts as well as the administration thereof.

Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

23. PROCESSING RELATED TO LEGAL DISPUTES, OUT-OF-COURT PROCEEDINGS AND PROCEEDINGS CONDUCTED BY AUTHORITIES (NATIONAL TAX AND CUSTOMS ADMINISTRATION (NAV), STATE AUDIT OFFICE (ÁSZ), CENTRAL BANK OF HUNGARY (MNB)), ADMINISTRATION AT THE COURT OF REGISTRY

Processed data: personal data of witnesses and other data thereof indicated in documents related to the legal dispute.

The purpose of processing: providing effective representation in legal disputes and proceedings conducted by authorities.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): being effective in taking action in legal disputes and successful enforcement of claims.

Duration of processing: termination of the legal dispute or the enforcement period + five years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the other party, the authority, the court.

Recipients, categories of recipients if there is data transfer: the court, the authority, the other party to the legal dispute.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: the Controller's assigned attorney(s)-at-law.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in being effective in taking action in legal disputes and proceedings by authorities as well as in successful enforcement of claims. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.