

DATA MANAGEMENT POLICY

For GetCon Hungary Zrt., lawful and transparent data processing is of paramount importance. Below, we would like to inform you about how we process your personal data and what rights you have in this context. Generally, we keep business-related company data records, but some data may concern you as an individual or as a designated contact person or representative of a company or other organization.

This general data processing notice has been prepared based on Regulation (EU) 2016/679 (“GDPR”) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC.

1. Data Controller

The data controller is the person or organization that determines the purpose and means of processing personal data. In this case, the data controller (the “Controller” or “we”) is GetCon Hungary Zrt. (1117 Budapest, Budafoki út 60., Company Registration Number: 01-10-140973).

Personal data includes any information that relates to you and from which you can be identified, such as your name or phone number.

2. How to Contact Us?

If you have any questions or complaints regarding our use of personal data, please send them via email to adatvedelem@getcon.hu. We investigate all complaints received and respond within 1 month.

3. How Do We Obtain Personal Data?

We may obtain your personal data in various ways during the sale and marketing of our services or in other business contexts.

Directly from you:

- When establishing a contractual relationship
- When making personal, telephone, or electronic inquiries or contacts (e.g., via email or through our website)
- Through your consent to receive direct marketing communications
- By participating in an event and submitting a business card or filling out an informational questionnaire
- By applying to any of our calls or job postings

From other sources:

- From another person who may act on your behalf or your employer
- Through electronic or offline intermediary platforms or service providers
- From publicly available databases or other sources (e.g., company registration data)

4. How Do We Ensure the Security of Your Data?

We store the data you provide securely and take measures to protect it to prevent its loss, unauthorized use, or alteration. Our goal is to do everything possible to prevent data breaches. We store your personal data electronically on our own server and in paper form at our office headquarters.

5. How Long Do We Store Personal Data?

We retain personal data for as long as it is necessary for the purpose for which it was collected. If multiple purposes apply to certain data, the longer retention period will apply in each case. In line with the principle of purpose limitation, we only process data for justified and lawful purposes. The personal data we process is used solely for the purpose that was apparent from the circumstances of the data collection and could reasonably be expected by the data subject.

If the data processing is necessary for the performance of a contract, we will process the data for the duration of the customer relationship and, following the termination of the contract or the customer relationship, for the general limitation period, which is 5 years.

If the data processing is based on your consent, we will process the data until you withdraw your consent, or if the purpose of the data processing is achieved earlier and there is no further purpose for data processing, until the purpose is fulfilled.

In any case, if a legal regulation (e.g., Act C of 2000, Act CL of 2017) requires us to retain certain documents, we will store the personal data contained therein for the retention period specified in the respective regulation.

6. Who Are the Recipients of the Data?

Access to your personal data is restricted to the individuals and decision-makers within the company whose work is necessary to achieve the purpose of the data processing. These employees only have access to the data to the extent required by their duties.

We primarily transmit data to third parties to comply with legal obligations (e.g., for mandatory data provision required by certain authorities). We may also share data with our cooperating partners or authorized representatives who participate in the service related to the data processing.

7. Online Presence in Social Media

GetCon Hungary Zrt. utilizes online platform services within social networks, thereby providing an alternative communication channel for interested parties who prefer such forms of communication.

Currently, we have our own online profiles on the following networks:

- Facebook: www.facebook.com/getconhungary
- LinkedIn: <https://www.linkedin.com/company/getcon-hungary-kft/>

When you connect with the above social media profiles, your interaction falls under the terms of service and privacy policies of the respective social networks. Please note that network operators will store users' data (e.g., personal data, IP address) and use it for their own business purposes as described in their privacy policies. It is also possible that your data may be processed or transferred outside the European Union.

8. What Rights Do You Have Regarding GetCon's Data Management?

You have the following rights regarding data processing:

- GDPR (i.e., Regulation (EU) 2016/679 of the European Parliament and of the Council)
- The Hungarian Data Protection Act (abbreviated as Info Act, Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information)

Right of Access:

This essentially means being informed about what data we process, why, and how. You have the right to receive feedback from us as to whether your personal data is being processed, and if so, you have the right to access the personal data and all relevant information related to its processing. Such information includes the purposes of the processing, the categories of data involved, and your rights. You are also entitled to receive a copy of the processed personal data. If you submit your

request electronically, you have the right to receive the information in a widely used electronic format (e.g., as a PDF or Word document).

Right to Rectification:

You have the right to request the rectification of inaccurate personal data without undue delay. If necessary, you may also request the completion of incomplete personal data.

Right to Erasure:

Under certain conditions, you have the right to request the erasure of your personal data without undue delay.

Right to Restriction of Processing:

You have the right to request that we restrict the processing of your data. This means that the restricted data can only be stored but may only be used in other ways with your consent or in specific legal cases. You may request the restriction of data processing if:

- a) You dispute the accuracy of the data until its accuracy is verified;
- b) The processing is unlawful, and you oppose the erasure of the data and instead request its restricted use;
- c) We, as the data controller, no longer need the personal data for processing purposes, but you require it to establish, exercise, or defend legal claims.

Right to Data Portability:

You have the right to receive the personal data provided to us in a structured, widely used, machine-readable format and to transfer this data to another data controller.

Right to Lodge a Complaint:

If you believe that the processing of your personal data violates the GDPR or other data protection regulations, please contact us at adatvedelem@getcon.hu. Additionally, you can file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).

NAIH Contact Information:

- **Address:** 1055 Budapest, Falk Miksa utca 9-11
- **Phone:** +36 1 3911400
- **Email:** ugyfelszolgalat@naih.hu
- **Website:** <http://www.naih.hu>

Data Processing Purpose	Categories of Processed Data	Duration of Data Processing	Legal Basis of Data Processing	Data Usage
GetCon Office Visitors	No access to visitors' personal data; such data is not processed or handled	-	-	Security measures are in place, including CCTV operated by the building's administrator
Business Relations Marketing	Name, Employer's name, Job title, Phone number, Email, Other business-related contact details	Data retention periods are linked to the limitation period in the absence of other requirements	Legitimate interest in CRM system, contract performance, and legitimate interest in contract fulfillment	Offers on services, recording and developing our business activities and services, internal administration
Job Application	-	-	-	Applicants are informed separately during the application
Contact through Website	Name and email provided when registering an inquiry through the website	30 days	Legitimate interest	process handling inquiries