

DATA PROCESSING INFORMATION

This notice describes how during its business activities Nordconn International Kft. (from now on referred to as Data Controller) processes the personal data of its partners, customers, and those interested in its services.

Should you have any further questions about this notice or the handling of your personal data, please contact us at any time using one of the contact details below.

1 DATA CONTROLLER

For the purposes of processing personal data under this Notice, the controller of data is:

NORDCONN International Kft.

seated at: 1113 Budapest, Bocskai út 134-146, Hungary

company registration number: 01-09-270280

court of registration: Fővárosi Törvényszék Cégbírósága

tax number: 25354193-2-43

Contact information for inquiries regarding data processing:

mailing address: 1113 Hungary, Budapest, Bocskai út 134-146.

e-mail address: info@nordconn.com; gdpr@nordconn.com

phone number: +36 70 884 3030

website: nordconn.com

2 DATA PROCESSING UNDER THIS NOTICE

2.1 Conclusion and performance of the contract

This clause applies to contracts concluded in the frame of our business activities i.e., contracts concluded with our principals or subcontractors, cooperating partners, and vendors. Employment contracts are not covered by this clause.

The purpose of data processing:

In relation to contracts, personal data processing is mainly performed when our contracting partner (either on the client or vendor side) is a natural person or a sole trader. The purpose

of processing the personal data of the contact persons is the smooth establishment, fulfilment, and termination of the contract.

Personal data of persons acting as contact persons may also be processed in connection with contracts. If our contracting partner is a company, the contact person will normally act as the contact person, but in the case of an individual or sole trader contracting partner, another person may act as the contact person on their behalf. The purpose of processing the personal data of the contact persons is to ensure the seamless establishment, performance and termination of the contract.

If based on the contract there is an obligation to issue an invoice, and our contractual partner is a natural person or a sole trader, the data presented on the invoice issued based on the contract are also regarded as personal data. The purpose of processing such personal data is to fulfil our accounting obligations as defined by law (issuing invoices, keeping invoices).

In case our contractual partner is a natural person or a sole trader, the purpose of data processing in the context of the performance of the contract also includes the settlement of any warranty and guarantee claims and other legal disputes.

The personal data processed for the above purposes is as follows:

In case of natural persons or sole traders:

personal identification data (name, home address, place and date of birth, mother's maiden name)

signature on written agreements

in case of sole traders, the number of the trader's ID

billing address, name, and tax number

contacts (phone number, e-mail address)

invoice details (invoice serial number, date, date of payment, payment deadline, gross and net amount, VAT amount, rate, and title of any discounts, etc.)

order details: name and identification data of products, services, quantity, price, order date, order status

payment details (bank account number, date, amount, method of payment, record of any debts)

reported warranty and guarantee claims, the content of the report on the claim, the method and date of fulfilment of the claim

for contact persons: name, e-mail address, phone number, company name, job title

On what legal basis and for how long do we process these personal data?

If the contracting partners are natural persons or sole traders, we need their personal data to conclude and perform the contract, so the provision of this data is a prerequisite for the conclusion of the contract. The legal basis for processing these data is the performance of the contract under Article 6(1)(b) GDPR. These data will be processed during the general tax law (5+1 years) limitation period and will be deleted after the expiry of this period without a specific request.

In addition, if the contracting partner is a natural person or a sole trader, certain personal data are processed based on the following legal obligation (Article 6(1)(c) GDPR):

if there is an obligation to issue or keep an invoice, we must process the invoicing data (invoicing name and address) in accordance with Act C of 2000 on Accounting (Act on Accounting) and we are obliged to keep the documents issued in connection with the contract together with the data contained therein for 8 years in accordance with Section 169 of the Act on Accounting;

if our customer is subject to VAT, we are obliged to indicate the tax number of the customer or service user on the invoice pursuant to Section 169 (d) (dc) of Act CXXVII of 2007 on Value Added Tax (hereinafter: VAT Act);

in the case of consumer contracts, we are obliged to keep a record of the reported claim for 3 years in accordance with the Decree 19/2014 of the Ministry of National Economy.

If a contract is concluded with a company, the contact person's data will be processed based on Article 6(1)(f) of the GDPR for our legitimate interest in the seamless performance of the

contract, during the limitation period (5 years) for the performance of the contract and the related claims.

2.2 Customer service data management, contacting

Purpose of data processing:

If you contact us with a query, we will process the personal data you have provided to us in a message, e-mail, postal letter, or telephone call to contact you and respond to your query.

This section covers enquiries. If the correspondence relates to the preparation of a specific contract or to a contract in progress or already performed, the details of that type of processing will apply to that contact.

Processed personal data for the above purposes

In case of an e-mail request:

name, e-mail address, other personal data provided by the enquirer (including in particular the contact details of the enquirer or other person concerned and the circumstances of the matter with which the enquirer has contacted us)

In the case of an enquiry via phone, the following data will be processed:

name, telephone number, date and time of the conversation, personal data provided by the enquirer (including in particular the contact details of the enquirer or other person concerned and the circumstances of the matter with which the enquirer has contacted the customer service)

In the case of a letter sent by post:

sender's name, address, date of delivery of the letter, additional personal data provided by the interested party (including in particular the contact details of the interested party or other person concerned and the circumstances of the matter with which the interested party has contacted us).

On what legal basis do we process the above personal data?

The personal data of the data subject processed in accordance with this section are processed based on Article 6(1)(f) of the GDPR for the purposes of recording and responding to the data subject's request and for our legitimate interest in the settlement of claims arising from it.

How long do we process your personal data?

Personal data (including e-mails) processed in connection with enquiries will be deleted after the purpose for which they were processed has ceased to exist. Thus, if the e-mail and the response to it are not expected to be needed for further administration or claims, they will be deleted immediately. Otherwise, the request and the response will be deleted after they are no longer needed for these purposes.

2.3 Newsletter

Purpose of data processing:

If you subscribe to our newsletter, the personal data you provide when subscribing will be processed for the purpose of contacting you at the contact details you provide with messages about NORDCONN International Ltd. services, current news, events, and related communications.

Processed personal data for the above purposes:

required data: surname, first name, e-mail address

If you do not provide any of the required information, we will not be able to accept your newsletter subscription.

On what legal basis do we process the above personal data?

The legal basis for the data processing is your voluntary consent based on this information (Article 6(1)(a) GDPR). Without your consent, we will not be able to register your subscription and thus we will not be able to send you our newsletters.

How long do we process the above personal data?

Your personal data processed in connection with the newsletter subscription will be deleted from our database at any time if; you request it or withdraw your consent to data processing, or unsubscribe from the newsletter.

You may unsubscribe from our newsletter at any time, free of charge, without justification and without any limitation:

by clicking on the "Unsubscribe" link in the footer of the newsletter or

by sending an e-mail declaration to info@nordconn.com or

by a letter post to NORDCONN International Kft. at 1113 Budapest, Bocskai út 134-146.

2.4 Registering for free-of-charge consulting

Purpose of data processing:

Registering applications for free counselling, preparing, and conducting the counselling.

Processed personal data:

Name, e-mail address, telephone number, company name, provided services.

On what legal basis do we process the above personal data?

The legal basis for the data processing is your voluntary consent based on this information (Article 6(1)(a) GDPR). Without your consent, we will not be able to accept your application.

How long do we process the above personal data?

The personal data provided during the registration process will be deleted immediately after the counselling is organised and conducted.

2.5 Registration for professional events organised and run by NORDCONN

Purpose of data processing:

The company sometimes organizes various professional events such as conferences, business breakfasts, webinars or similar events. It is a beneficial for the organization and preparation of the event if we know in advance how many participants we can expect. The pre-

registration allows us to send the information about the event to the registrants (e.g. in case of a webinar, the link, access details, etc.).

Processed personal data:

The exact scope of the data processed is set out in the registration form. The data marked with an asterisk on the registration form are mandatory. Failure to provide the required data will result in a failed registration, i.e. the person concerned will not be able to participate in the event.

Mandatory data are usually: first name, surname, company name, e-mail address.

Optional data can usually be: telephone number, comments, questions, remarks, etc.

On what legal basis do we process the above personal data?

The legal basis for data processing is the voluntary consent of the registrant based on this information (Article 6 (1) (a) GDPR). Without consent, we cannot accept the registration and thus cannot provide the possibility to participate in the event.

How long do we process your personal data?

The data processed in connection with registration will no longer be processed for this purpose if the purpose of the processing has ceased (i.e. the event and related follow-up communication has been completed) or if the data subject withdraws his or her consent.

2.6 Cookies

Cookies and their purposes

The website uses cookies. A cookie is a small data file consisting of letters and numbers that is installed on your computing device (computer, smartphone, tablet, etc.) when you visit the website. This allows the website to recognise the user's browser, for example, to determine whether the user has visited the website before.

The cookie itself does not contain or collect information, it is only used to help identify users. This helps to provide them with a more convenient, user-friendly service.

The primary purpose of the cookies is to enable the website to function properly. They allow tracking the data that is collected about visits to the website and to detect possible abuse of the website.

In principle, the data collected by the cookies cannot be used to identify the user, and this data will only be linked to other data which is potentially suitable for identification if the user explicitly consents to the use of identifiable cookies in relation to him or her.

Cookies are stored in the browser's memory and typically contain the following:

The name of the sending server

The cookie's lifetime

The value - usually a randomly generated unique number

This number is used by the server of the website that sends the cookie to identify the user when they return to or move from page to page. Only the sending server can read and use this value. Cookies play a central role in the customisability of the internet and behavioural advertising is usually cookie-based.

How to delete or disable cookies?

You can delete cookies from your device or set your browser to block cookies. It is also possible to disable all cookies, but this will significantly degrade your web browsing experience if you use services that use cookies.

You may find cookie settings for different browsers [HERE](#).

Cookies we use and their purposes:

You may find the related spreadsheet [HERE](#).

We also use the services of Google Analytics on the Website. The cookies managed by Google Analytics help us to measure website traffic and other web analytics data. The information collected by cookies is transmitted to and stored on external servers operated by Google. Google will use this information primarily for the purpose of tracking website activity

and compiling analytics about website activity for us. Google may transfer this information to third parties where required to do so by law. Google may also transfer this information to third parties for data processing. Google Analytics can provide detailed information on the processing of data by Google Analytics (<http://www.google.com/analytics>).

Our ads are displayed on websites of external service providers (Google, Facebook). These third-party service providers (Google, Facebook) use cookies to store information about previous user visits and, based on this information, display ads to the user in a personalised way (i.e. remarketing).

Users can also opt-out of cookies from third-party service providers by visiting the unsubscribe page of the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>).

The processing of data by the aforementioned external service providers is governed by the data protection standards set by these service providers, and we do not assume any responsibility for such processing.

3. WHO MAY HAVE ACCESS TO YOUR PERSONAL DATA?

Personal data will be treated confidentially. The personal data we process may be accessed by our employees to perform their job duties, and by our data processors and their employees in the tasks they perform. These persons are also required to treat the personal data they receive as confidential.

Our data processors and their responsibilities can be found [HERE](#).

We reserve the right to involve additional data processors in the future, which we will inform you of by amending this notice.

We disclose personal data to courts, prosecutors, and other authorities in fulfilling our legal obligations, to the extent and in the manner required by law. In the event of a legal claim against you, your personal data may also be disclosed to the extent necessary for the enforcement of the claim by our respective legal cooperation partners and our claims management partners.

4 DATA SAFETY

We are committed to taking the necessary data security measures. In this context, we adopt and implement, and regularly review technical and organisational measures and procedures to ensure that the personal data we process is secure. We will do our utmost to prevent the destruction, unauthorised use, or alteration of the data, and ensure that the personal data we process is not accessible, disclosed, transmitted, modified, or deleted by unauthorised persons. We remind all those to whom we transfer personal data to comply with the requirements of data security.

In the context of the above, information technology solutions are designed and selected to ensure that those who have access to the data have exclusive access, and that the data remain authentic and unaltered. This includes, but is not limited to, password protected access systems, activity logging, regular back-up creation and utilization.

We always keep abreast of technological developments, apply the available technical, technological, and organisational solutions, and apply solutions that meet the level of protection justified by our data management.

5 HANDLING DATA BREACHES

A data breach is any incident whereby personal data is accessed by an unauthorised person or is destroyed, lost or altered. For example, if the database is destroyed or the storage medium on which the data is stored is lost.

In the event of a data breach, we will assess the impact and risks (what data is affected, how much, whether it can be recovered, etc.) and take the necessary steps to remedy the situation without delay. If we are unable to address the risks, we will report the incident to the data protection authority within 72 hours of becoming aware of the incident and we will publish information about the incident on our website. We also keep records of data breaches in the detail required by law.

6 YOUR RIGHTS

WITHDRAWAL OF CONSENT: If the processing is based on your consent, you have the right to withdraw your consent at any time without giving any reason. If your consent is withdrawn,

your personal data will no longer be processed and will be deleted. Withdrawal of consent does not affect the lawfulness of the prior processing.

RIGHT OF REQUEST: At any time, you can use the contact details provided in Section I to request information about whether we process your personal data and if so, to request further information about:

the purposes of the processing, the legal basis for the processing, the personal data we process, the categories of personal data we process, the recipients or categories of recipients (including data processors we use) to whom or which we have disclosed or will disclose the personal data (in the case of transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the transfer, the duration of the storage of the data, the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data relating to him or her and to object to the processing of such personal data, the right to lodge a complaint with the NAIH, the source of the data, the circumstances of the possible personal data breach, its effects and the measures taken to remedy it

We will provide you with a copy of the personal data we hold about you together with the above information. The first copy is free of charge, but we are entitled to charge a reasonable fee for each additional copy based on our administrative costs. The amount of this charge will be communicated to you in advance.

RIGHT TO CORRECTION, AND SUPPLEMENTATION: If you become aware that any of your personal data is incorrect, inaccurate, or incomplete, please provide us with the correct or supplementary data as soon as possible so that we can make the correction or supplementation.

RIGHT TO ERASURE: You have the right to request the erasure of your personal data. Please note that we may refuse to erase your data, in particular if we need or may need it to comply with a legal obligation or to pursue a claim.

If the data processing is based on a legitimate interest, the objection to the processing shall entail the deletion of the data, provided that there is no overriding reason why the deletion cannot be complied with.

Deletion shall also take place when

- (a) the data are no longer necessary for the original purpose of the processing;
- (b) the processing is unlawful;
- (c) we are required by European Union or national law to erase the data.

RIGHT TO RESTRICT PROCESSING: In the course of the processing, you may request the restriction of processing if (i) you contest the accuracy of the personal data, in which case the restriction will apply for the period of time that allows us to verify the accuracy of the personal data; (ii) the processing is unlawful but you oppose the erasure of the data and instead request the restriction of their use; (iii) we no longer need the personal data for the purposes of processing but you request it for the establishment, exercise or defence of legal claims; (iv) you have objected to processing based on our legitimate interests, in which case the restriction applies for a period of time until it is determined whether the our legitimate grounds prevail over your legitimate grounds.

In the case of restriction, we will only store the data and will not perform any other processing on it, unless you consent to further processing or unless such further processing is necessary to protect your rights, the rights of a third party or is public interest.

In case of restriction of processing, you will be informed in advance.

RIGHT TO OBJECT: In relation to processing based on our or a third party's legitimate interests, you may object to our processing if you conclude that the processing is detrimental to you.

In the event of an objection, personal data will be deleted unless there is an overriding reason to keep it. Such an overriding reason may be if we wish to pursue a claim against you.

RIGHT OF ACCESS TO DATA: where we carry out processing by automated (i.e. electronic) means on the basis of your consent or on the basis of a legal basis for the performance of a contract, you may request that the personal data we have about you are provided to you or to a person you designate in a commonly known and easily usable electronic format.

7 SUBMISSION OF AND RESPONSE TO REQUESTS

If you wish to exercise any of the above rights, please send us your request in writing, if possible, to one of the contact details indicated in paragraph I. In your letter, please also provide us with your identification details and your postal address. If we have doubts about your identity or if the information provided is not sufficient to identify you, we are entitled to ask you for additional identification information.

Your request will be processed within 1 month. If necessary, we are entitled to extend this period by a further 2 months and providing you with a reasoned explanation.

Valid requests will be fulfilled free of charge. However, if the request is clearly unfounded or excessive, in particular because of its repetitive nature, we are entitled to charge a reasonable fee or even refuse to act on the request.

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. Upon your request, we will inform you of the recipients to whom we have communicated or informed as described above.

8 COMPENSATION, DAMAGES

If we cause damage to you or to another person by unlawful or unsecure processing of your personal data, you or the person who has suffered damage may pursue a claim against us. If we infringe your privacy rights in this context, you are entitled to claim damages.

Please note that we are not liable to pay compensation or damages if the damage can be proved to have been caused by an external cause beyond our control or if the damage results from your intentional or negligent conduct.

9 PURSUING A CLAIM

Contacting the data controller

If you believe that we are not acting lawfully in processing your personal data, please first contact us as the data controller using one of the contact details provided in Section I in order to enable us to process your comments as quickly and efficiently as possible.

Opening a court case

Please note that you are also entitled to pursue your claim in court. The courts have jurisdiction to hear the case. You can bring your claim before the court where we are based or before the court where you live or reside.

Contacting the data protection authority, filing a complaint

In the event of unlawful data processing, you are also entitled to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

website: <https://www.naih.hu/>

address: 1055 Budapest, Falk Miksa Street 9-11.

Postal address: 1363 Budapest, PO Box 9.

Budapest, 2022. 02. 02

NORDCONN International Ltd.

data controller