

PRIVACY POLICY

For direct marketing and sales communication

MADIS Consulting Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság as controller – hereinafter referred to as the *Company* or the *Controller* – provides a detailed information on its Privacy Policy to the natural person (hereinafter referred to as *Data Subject*) below and in accordance with Article 12, 13 and 14 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

1. Name and contact details of the Controller

Name of the Controller: MADIS Consulting Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság

Registered seat: Cirok str. 9. 3/B, H-1024 Budapest,

Registration No.: 01-09-889239

Email address: office@madis.hu

Phone: +36 30 478 5569

Responsible for data protection issues: István Szente, CEO

2. Definitions

Personal Data: when this Policy mentions personal data, it refers to any information concerning an identified or identifiable natural person.

(Identifiable natural person: the natural person, who is directly or indirectly – especially upon each identical data (such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person) identifiable.

Data subject: a natural person, who is identifiable upon any information.

Recipient: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

3. Legal framework of data processing

Main legal rules applicable for data processing referred in this Policy are the followings:

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- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**General Data Protection Regulation**" or "**GDPR**")
- Act CXII of 2011 on informational self-determination and the freedom of information (the "**Information Act**")
- relevant data protection laws of the jurisdiction applicable to the data subject, such as – in case of Germany – the Federal Data Protection Act of June 30, 2017 (implementing the GDPR in Germany, i.e.: **Bundesdatenschutzgesetz**, hereinafter referred as "**BDSG**")

4. Scope of personal data

Contact details of employees of possible contracting parties

Purpose of data processing: after an express consent from data subject, sending a detailed presentation upon IT solutions of MADIS (i.e for energy sector, financial sector, etc.), sending direct marketing and sales communication by emails in order to build business connection. By providing his/her contact details and checking off the relevant check box on the website of MADIS, it shall be deemed that data subject provided his/her expressed consent to process (store in our CRM database, use it for purposes detailed above) its personal data and as an acceptance of this Privacy Policy.

Legal basis of data processing: Legitimate interest to direct marketing and sales communication of the Company (point f) of paragraph (1) of Article 6 of GDPR) and consent of data subject (point a) of paragraph (2) of Article 6 of GDPR)

Scope of personal data: name, email address, phone number (optionally), company name (optionally) or other data (if any) provided by the data subject

Source of data: data given by the relevant employee of the possible contracting party;

Date of data erasure: according to Data subjects request, in lack of a request and in case of concluding a contract between the company of Data Subject and the Controller it is equal to the retention time of relevant contract, in lack of concluding a contract, the retention time is 2 years from the consent of data subject.

Erasure or rectification (modification) may be initiated via the abovementioned contact details in point 1. Upon such request, the Controller shall rectify or erase data immediately and any charge.

5. Data protection measures

In order to guarantee the confidentiality, integrity and availability of personal data of data subject, the Company stores personal data solely on the designated data medium and data storages which enables data subject upon right to access, and stores in

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databases protected by password and/or by encryption in line with common IT security standards.

The Company secures data protection risk proportionally and adjusted to personal or business nature of data, on the level of network, infrastructures and applications (firewalls, antivirus software, encryption mechanism for storage and communication and other technical and process related solutions).

The Company monitors and handles personal data breaches continuously. The Company provide for the security of paper based records and all personal data processed on paper through a storage place unavailable for unauthorized persons. After duration of data processing period has been expired, paper based records shall be destructed by burning or by shredder with the assistance of designated Data subjects.

6. Rights of data subjects relating to data processing

Within the timeframe of data processing, data subjects have the rights mentioned below in relation to data processing in accordance with Article 15, 16, 17, 18, 21, 11, 77, 78,79 and 82 of GDPR and Section 14–23 of Information Act:

Right to request information: If the Company process any personal data of the data subject, the Company is shall provide information – without request therefor – upon the most important characters of data processing, such as the purpose, legal basis, the retention time of data processing, identity of the controller and its representative with their contact details, contact details of data protection officer, recipients of personal data, legitimate interest of the Company and/or the third party in case of data processing based thereon, and rights and options for legal remedies regarding data processing (including right to lodge a complaint to the supervisory authority), and, if the source of the data is not the data subject personally, then the source of personal data and the categories of personal data concerned, provided, the Data Subject is not aware of this information. The Company provides this information to Data Subjects by making available this Privacy Policy.

Right to access: The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information listed in GDPR, including purposes of processing, categories of personal data concerned, recipients of personal data, (planned) period of processing, rights and options for legal remedies of data subject (including the right to lodge a complaint to a supervisory authority), and where the personal data are not collected from the data subject, any available information as to their source. Upon the request from the data subject, the Company provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means,

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and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy shall not adversely affect the rights and freedoms of others. The options, means and possible expenses and other details regarding to obtain a copy, the Company provides information upon the request of data subject.

Right to rectification

Data subjects shall have the right to request the Company to change any of their inaccurate personal data without undue delay. Taking into account the purpose of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to restriction of processing: The data subject shall have the right to obtain from the controller restriction of processing if the accuracy of the personal data is contested by the data subject, or if the processing is unlawful, and the data subject opposes the erasure of the personal data, or if the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the enforcement of his or her legal claims. Where processing has been restricted as above, such personal data shall, with the exception of storage, only be processed with the data subject's 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.

Right to data portability: The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format, if the processing is based on consent or contract and the processing is carried out by automated means. Regarding automated processing, the data subject should have the right not to be subject to a decision, which may include a measure, evaluating personal aspects relating to him or her (including 'profiling') which is based solely on automated processing and which significantly affects him or her

Right to erasure ('right to be forgotten'):

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her in cases prescribed in point a-f) in paragraph (1) of Article 17 of GDPR. The Company is obliged to erasure – beside others – personal data of data subject, if the data subject request and the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; or if data subject withdraws the consent on which the processing is based and there is no other legal ground for the processing, or if the personal data have been unlawfully processed, or if the data subject object to the processing and there are no overriding legitimate grounds for the processing, or the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which is applicable to the Controller. Data subject is not allowed to exercise the right to erasure if the processing is necessary in compliance with paragraph (3) of Article 17 of GDPR, especially, if the processing is necessary

- for exercising the right of freedom of expression and information,

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- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject;
- for or archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, provided that the right erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- for the establishment, exercise or defence of legal claims

Right to object: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on legitimate interest of the Controller or official authority vested therein. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to withdraw: if the data processing of the Company based on the consent of data subject, data subject shall have the right to withdraw his or her consent at any time.

7. Information about exercising rights

The Company shall provide information on action taken on a request based on the rights of data subject listed above to data subject without undue delay and in any event within one month of receipt of the request.

That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority (in Hungary with Hungarian National Authority for Data Protection and Freedom of Information; 'NAIH') and seeking a judicial remedy.

Contact details of NAIH

address: 1055 Budapest, Falk Miksa str. 9-11.;

phone: +36-1-391-1400;

Fax: +36-1-391-1410

e-mail: ugyfel-szolgalat@naih.hu;

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website: www.naih.hu

Contact details of Berliner Beauftragte für Datenschutz und Informationsfreiheit:

Alt-Moabit 59-61

10555 Berlin

Telefon: +49 30 13889-0

Fax: +49 30 2155050

E-Mail: mailbox@datenschutz-berlin.de

weboldal: <https://www.datenschutz-berlin.de/ueber-uns/kontakt/>

The information above shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means. Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR.

Furthermore, data subjects shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them, or even if competent supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under GDPR have been infringed as a result of the processing of his or her personal data in non-compliance with GDPR. Proceedings against the Company or its processor partner shall be brought before the courts of the Member State where the Company or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence.

Dated as of July 20, 2024