# **PRIVACY NOTICE**

T-Systems Magyarország Zrt. as data controller (registered office: Könyves Kálmán krt. 36. 1097 Budapest, Hungary; company reg. no.: 01-10-044852; tax no.: 12928099-2-44) according to 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) hereby informs the Data Subjects below regarding the management of their personal data.

## 1. Company name and contact details of data controller:

T-Systems Magyarország Zrt. (registered office: 1097 Budapest, Könyves Kálmán krt. 36.; company reg. no.: 01-10-044852; tex no.: 12928099-2-44;)

# 2. Name and contact details of data protection officer:

dr. Pók László (address: 1097 Budapest, Könyves Kálmán krt. 36.; email: DPO@telekom.hu)

# 3. The scope of personal data processed, the legal basis of processing, the purpose and peiod of processing,

Purpose of data processing	Legal base of data processing	Types of processed personal data	Retention period
Making contact to give unique offers	Consent of the data subject, Article 6 (1) point a) of the General Data Protection Regulation The consent of the data subject can be revoked at any time. The withdrawal of the data subject's consent does not affect the lawfullness of the data processing, before the withdrawal of the data subject's consent.	- Name of the contact person - Contact phone number - Contact email address	Storage until withdrawal. The data controller deletes personal data every quarter (starting in January). Personal data entered 30 days before the quarterly deletion will be deleted by the Data controller at the end of the next quarter. In case of withdrawal of consent, personal data will be deleted.
Marketing inquiry via newsletters	Consent of the data subject, Article 6 (1) point a) of the General Data Protection Regulation The consent of the data subject can be revoked at any time. The withdrawal of the data subject's consent does not affect the lawfulness of the data processing, before the withdrawal of the data subject's consent.	- Name of the contact person - Contact phone number - Contact email address	Storage until withdrawal. The data will be automatically deleted after 1 year after giving consent. In case of withdrawal of consent, personal data will be deleted.

Personal data is provided voluntarily.

#### 4. Automated decision-making (including profiling):

During data processing, automated decision-making, including profiling, does not take place.

#### 5. International transfer of personal data, recipients of personal data and categories of recipients:

The Data Controller uses the following data processors in relation to data processing:

Company Name: Mito Creative Zrt. (Company registration number: 01-10-140905, tax number: 27989485-2-41, registered office: 1053 Budapest, Károlyi utca 9, 4th floor

Website: www.mito.hu

#### Email address: info@mito.hu

Personal data will only be forwarded to the above recipients. Personal data will not be transferred to a third country (ie outside the European Union) or to an international organization.

# 6. Duration of storage of personal data or criteria for determining the duration:

Personal data will be processed until the consent of the Data Subject is withdrawn. Consent to data processing can be withdrawn by the Data Subject at any time.

# 7. Rights of data subject with regard to the data processing:

Corresponding to applicable data protection laws, you - based on particular circumstances - shall have the:

- a) right to request access to your personal data;
- b) right to have your personal data rectified;
- c) right to have your personal data erased;
- d) right to restrict the processing of your personal data;
- e) withdraw the consent provided to the processing of personal data.
- f) d) the right to data portability, if the conditions specified in the legislation exist, and
- g) e) in the case of data processing based on legitimate interest, the right to protest.

# Right of access:

The data subject has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data processing is underway, he is entitled to receive access to the personal data. The Data Controller provides the Data Subject with a copy of the personal data that is the subject of data processing. For additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the Data Subject submitted the request electronically, the information must be provided in a widely used electronic format, unless the Data Subject requests otherwise.

#### Right to rectification:

The Data Subject has the right to have inaccurate personal data corrected without undue delay upon request by the Data Controller.

#### Right to erasure:

The data subject has the right to have the data controller delete the personal data concerning him without undue delay at his request, and the data controller is obliged to delete the personal data concerning the data subject without undue delay if one of the following reasons exists:

a) the personal data are no longer needed for the purpose for which they were collected or otherwise processed;

b) the data subject withdraws the consent that forms the basis of the data management pursuant to point a) of Article 6 (1) or point a) of Article 9 (2) of the General Data Protection Regulation, and there is no other legal basis for the data management;

c) the Data Subject objects to the data processing based on Article 21 (1) of the General Data Protection Regulation and there is no overriding legitimate reason for the data management, or the Data Subject objects to the data management based on Article 21 (2) of the General Data Protection Regulation;

d) personal data were handled unlawfully;

e) personal data must be deleted in order to fulfill the legal obligation prescribed by EU or Member State law applicable to the data controller;

f) the collection of personal data took place in connection with the offer of information society-related services referred to in Article 8 (1) of the General Data Protection Regulation (conditions for the consent of children).

#### Right to restrict data processing:

The Data Subject is entitled to request that the Data Controller to restrict data processing if one of the following conditions is met:

a) the data subject disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the data controller to check the accuracy of the personal data;

b) the data management is unlawful and the data subject opposes the deletion of the data and instead requests the restriction of their use;

c) the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to submit, enforce or defend legal claims; or

d) the data subject has objected to data processing in accordance with Article 21 (1) of the General Data Protection Regulation; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

If data processing is subject to restrictions, such personal data may only be processed with the consent of the Data Subject, except for storage, or to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the European Union or a member state.

# Right to data portability:

The Data Subject is also entitled to receive the personal data relating to him provided to the Data Controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without being hindered by the data controller, to which the personal data has been made available, if: (i) the data processing is based on consent according to point a) of Article 6 (1) of the General Data Protection Regulation or point a) of Article 9 (2) of the General Data Protection Regulation, or on a contract according to Article 6 (1) point a) of the General Data Protection Regulation and (ii) data management is performed in an automated manner.

# Right to protest:

The Data Subject has the right to object at any time to the processing of his personal data based on points e) or f) of Article 6 (1), including profiling based on the aforementioned provisions, at any time for reasons related to his own situation. In this case, the data controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are necessary for the presentation, enforcement or defense of legal claims are connected.

If personal data is processed for direct business acquisition, the data subject has the right to object at any time to the processing of personal data concerning him for this purpose, including profiling, if it is related to direct business acquisition. If the data subject objects to the processing of personal data for the purpose of direct business acquisition, then the personal data may no longer be processed for this purpose.

# General rules for the exercise of the rights of the data subjects:

The Data Controller shall inform the Data Subject without undue delay, but no later than one month from the receipt of the request, of the measures taken as a result of the request. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months. The Data Controller shall inform the Data Subject of the extension of the deadline, indicating the reasons for the delay, within

one month of receiving the request. If the Data Subject submitted the request electronically, the information must be provided electronically, if possible, unless the Data Subject requests otherwise.

The Data Controller provides the Data Subject with information and measures free of charge. If the Data Subject's request is clearly unfounded or - especially due to its repetitive nature - excessive, the Data Controller, taking into account the administrative costs associated with providing the requested information or information or taking the requested action:

- a) may charge a fee of a reasonable amount, or
- b) may refuse to take action based on the request.

It is the responsibility of the Data Controller to prove that the request is clearly unfounded or excessive.

If the Data Controller has reasonable doubts about the identity of the natural person who submitted the request, it may request the provision of additional information necessary to confirm the Data Subject's identity.

# 8. Legal remedies:

The Data Subject may at any time contact the data protection officer of the Data Controller (dr. László Pók; address: 1097 Budapest, Könyves Kálmán krt. 36.; email: <u>DPO@telekom.hu</u>).

In the event of a violation of their rights, the Data Subject may apply to court against the Data Controller. The court acts out of sequence in the case. The Data Controller is obliged to prove that the data management complies with the provisions of the law. The adjudication of the lawsuit falls within the jurisdiction of the court, in the capital, the Metropolitan Court. The lawsuit can also be initiated before the court of residence or residence of the Data Subject.

The Data Controller is obliged to compensate the damage caused to others by the unlawful handling of the Data Subject's data or by violating the requirements of data security. The Data Controller is released from liability if it proves that the damage was caused by an unavoidable cause outside the scope of data management. There is no need to compensate the damage if it resulted from the intentional or grossly negligent behavior of the injured party.

In the event of a complaint regarding the handling of his personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (dr. Attila Péterfalvi, President of the National Authority for Data Protection and Freedom of Information, postal address: 1530 Budapest, Pf.: 5., address: 1125 Budapest, Erzsébet Szilágyi fasor 22/c, Phone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; E-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

Date: March 23, 2023, Budapest