

PRIVACY POLICY CONCERNING COOKIES

As a data controller, DSS Consulting Zrt. (hereinafter referred to as the "Data Controller" or "Company") pursuant to Article 13 of the European Union General Data Protection Regulation (Regulation 679/2016, hereinafter referred to as "GDPR"), provides the following information regarding the processing of data in connection with the use of cookies on the website operated by the Company located at <https://www.dss.hu> ("Website").

DSS Consulting Zrt. manages the personal data it collects confidentially, in accordance with data protection legislation and international recommendations, in accordance with this Privacy Policy (hereinafter "Policy") and takes all security, technical and organisational measures to ensure the security of the data.

Details of the Data Controller:

Company name: DSS Consulting Informatikai és Tanácsadó Zártkörű

Részvénytársaság

Registered seat: 1121 Budapest, Denevér köz 2

Company registration number: 01-10-141490

Represented by: Lajos Lukács CEO

E-mail: info@dss.hu

Data protection contact: László Sütő

The purpose of this Policy is to provide detailed information, during the use of the website operated by the Data Controller. The term of Data Subject/User refers to the visitor of the Website. The User, as Data Subject, accepts the following and consents to the processing of data as set out below. By submitting his/her personal data to the Company, the Data Subject accepts the provisions of this Policy and consents to the processing of his/her data in accordance with this Policy.

The current version of this Policy is available at all times at <https://www.dss.hu/>. The Data Subject acknowledges and accepts the following and consents to the processing of the data as set out below.

Cookies and their treatment

The Website and its third-party partners use cookies and similar technologies when registered or unregistered Users of the Website use the Website from a computer, tablet or mobile phone. The basic purpose of using cookies is to provide certain basic functions of the Website, to improve the user experience, to make it more personal, to display appropriate, personalized advertisements, offers and to collect statistical data to support the further development of the Service.

A cookie is a packet of information, usually a small text file, containing a unique identifier and stored on the user's computer or mobile device. The cookie is placed on the User's device by the visited Website itself for identification purposes, so that the device used by the User will be recognised when visiting a particular website.

Some of the cookies, which are not strictly necessary for functionality, are based on the User's consent, while others (which are essential for the provision of the service) are based on the legitimate interest of the Data Controller.

The Website uses the following cookies when Users access the Website and browse its pages.

Cookies strictly necessary for the functioning of the Website

Such cookies are essential for the proper functioning of the Website. Without the acceptance of these cookies, the Company cannot guarantee that the Website will function as expected, nor that the User will have access to all the information he/she is looking for. The data stored by these cookies do not "collect" personal data for marketing, analytics, etc. purposes, but are only necessary for the basic functioning of the Website.

Legal basis for processing: The Data Controller has a legitimate interest, i.e. the User's consent is not required, if the sole purpose of the use of cookies is the transmission of communications over an electronic communications network or if the Data Controller as a service provider absolutely needs the cookies to provide an information society-related service expressly requested by the subscriber or user.

Scope of data processed: Unique identification number, dates, times

Purpose of processing: Identifying Users and tracking visitors.

Scope of Data Subjects: Website visitors and registered Users.

Duration of processing: The duration of data processing is until the end of the visit to the website in the case of session cookies, or 1 day, 1 year or 2 years in other cases. Data subjects have the possibility to delete cookies in the Tools/Settings menu of their browsers, usually under the Privacy settings. For more information see <https://www.joomla.org/cookie-policy.html>.

Cookies for statistical purposes

Purpose of the processing: By using cookies for statistical purposes, the website collects information about how users use the website. These help to analyse and improve the website (e.g. Google Analytics).

Legal basis for processing: User consent

Cookies for marketing purposes

Marketing cookies track users across websites, such as displaying ads, all in order to show them relevant content.

Legal basis for processing: User consent

The Data Controller informs the Website Visitors and Users that Google Analytics helps to independently measure the Website's traffic and other web analytics data. Google Analytics uses an additional cookie to identify visitors. Google Analytics does not record any IP data that could be used to identify the Data Subject. Google provides detailed information about the measurement data and how these are processed on the following page:

<https://policies.google.com/technologies/cookies?hl=hu>

Setting cookie usage in browsers

The Data Controller draws the attention of Users to the fact that some Internet browsers automatically accept cookies, but Users have the possibility to enable, delete or automatically reject them by changing or modifying the settings of their computer browser. If you do not consent to the use of cookies, you may not be able to use certain features of the Website to their full extent. Information and help on how to manage cookies in your browser is available in the "Help" sections of your browser.

Setting up cookie use on the Website

After logging in to the Website, the Data Controller will provide a pop-up window with information on the details of the cookie management of the Site, where the User will be asked to give consent to

the cookie management procedures of the Site. The User can choose which types of cookies he or she agrees to manage by ticking or unticking the box in front of the cookie type.

After accepting the cookie management, the User can change or modify his/her consent to the cookie management of the Site at any time by clicking on the link in the "Cookie Management/Cookie Settings" tab in the "Cookie Policy" window in the footer and then by clicking on the "Accept" or "Accept all" button above them.

Links to other external addresses

The Website may also contain links to other sites which are not operated by the Data Controller and are only intended to provide information to Users ("hyperlinking"). The Data Controller has no control over the content and security of the websites operated by these companies and is therefore not responsible for them. The Company asks Users to review the Privacy Policy and Privacy Statement of these sites before providing any form of information on the site.

Rights of the Data Subject in relation to data processing

The Company draws the attention of the Data Subjects to the fact that in the event of a complaint or comment, it is advisable to contact the Company as the Data Controller at one of the contact details indicated in this Policy.

Rights of the Data Subject

a) Right to information/ right of access

The Data Subject has the right to receive feedback from the Company on whether or not his or her personal data are being processed and, if such processing is ongoing, the right to be informed of the personal data processed, the purposes of the processing, the categories of data, the recipients, the storage period, the rights and the source of the data.

The Company shall provide the Data Subject with a copy of the personal data subject to processing. For additional copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs.

b) Correction and deletion

The Data Subject is entitled to have inaccurate personal data relating to him or her corrected by the Company without undue delay upon his or her request. Taking into account the purpose of the processing, the Data Subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

c) Delete/erasure

The Data Subject shall have the right to obtain from the Company, upon his/her request, the erasure of personal data relating to him/her without undue delay if the purpose of the processing has ceased, the Data Subject has withdrawn his/her consent to the processing and there is no other legal basis for the processing, if the personal data have been unlawfully processed.

d) Restrictions on the processing of data

The Data Subject is entitled to have the Company restrict processing at his or her request if one of the following conditions is met:

- the Data Subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Controller to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of their use;
- the Company no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or the Data Subject has objected to the processing; in which case the restriction applies for the period until it is determined whether the Company's legitimate grounds prevail over the Data Subject's legitimate grounds.

Where processing is restricted on the basis of the above, such personal data, with the exception of storage, may only be processed with the consent of the Data Subject 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 important public interests of the Union or of a Member State.

The Company will inform any recipient of the rectification, erasure, blocking or restriction of processing to whom or with which it has disclosed the personal data, unless this proves impossible or involves a disproportionate effort.

e) The right to data portability

The Data Subject has the right to receive personal data concerning him or her which he or she has provided to the Company in a structured, widely used, machine-readable format and the right to transmit such data to another controller without hindrance by the Company, if the processing is based on consent and the processing is automated. In exercising the right to data portability, the Data Subject has the right to request, where technically feasible, the direct transfer of personal data between controllers. The exercise of this right must not prejudice the right to erasure. That right shall not apply where the processing is 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 exercise of the right must not adversely affect the rights and freedoms of others.

f) Protest

The Data Subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions. In such a case, the Company may no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which would have legal effects concerning him or her or similarly significantly affect him or her.

The exception to the above is if the decision:

- is necessary for the conclusion or performance of a contract between the Data Subject and the Company; - is permitted under Union or Member State law applicable to the Company which also lays down appropriate measures to protect the Data Subject's rights and freedoms and legitimate interests; or
- is based on the Data Subject's explicit consent.

Procedure in case of a request by the Data Subject

The Data Subject may contact a representative of the Company at any of the contact details indicated in this Policy with any of the above requests or other questions or requests concerning his or her personal data.

The Company must consider the request within 30 days of receipt of the written request. If necessary, taking into account the complexity of the application or the number of pending

applications, the Company may extend the time limit for processing the application. The Data Subject must be informed in advance of the fact of the extension or the reasons for it.

If the Data Subject's request is justified, the Company shall implement the requested measure within the procedural time limit and shall inform the Data Subject in writing of the implementation. If the Company rejects the Data Subject's request, it shall issue a written decision to that effect. In its decision, the Company shall state the facts on which the decision is based, the reasons for the decision, with reference to the relevant legislation and case law, and shall inform the Data Subject of the legal remedies available against the decision of the Company.

If the Data Subject does not agree with the Company's decision or if the Company fails to comply with the relevant procedural time limit, the Data Subject may refer the matter to the supervisory authority or to a court.

Supervisory authority

If the Data Subject considers that the processing of his or her personal data by the Company violates the provisions of the applicable data protection legislation, in particular the GDPR, he or she has the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information.

Contact details of the National Authority for Data Protection and Freedom of Information:

Website: <http://naih.hu/>

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf. 9.

Phone: +36-1-391-1400 Fax: +36-1-391-1410

Email: ugyfelszolgalat@naih.hu

The Data Subject also has the right to lodge a complaint with a supervisory authority established in another EU Member State, in particular in the EU Member State where he or she has his or her habitual residence, place of work or place of the alleged infringement.

Right to bring an action (right to go to court)

Irrespective of their right to lodge a complaint, Data Subjects may take legal action if their rights under the GDPR have been infringed in the processing of their personal data.

The Company, as a Hungarian Data Controller, may be sued before a Hungarian court.

If the Data Subject wishes to bring legal proceedings against the Data Processor, such proceedings must be brought before the courts of the Member State in which the Data Processor is established.

The Data Subject may bring the action in the courts for the place where he or she resides or is domiciled. In Hungary, the courts can be found at the following link: <http://birosag.hu/torvenyszekek>.

If the Data Subject has his or her habitual residence in another Member State of the European Union, the action may also be brought before the competent court of the Member State of habitual residence.

Other provisions

The Company reserves the right to unilaterally amend this Policy at any time.

This Policy is effective until further notice or until revoked. The Company reserves the right to change the contents of the Policy.

Dated: Budapest, 26 January 2022.

DSS Consulting Zrt.

Data Controller