PRIVACY POLICY

As a data controller, DSS Consulting Zrt. respects the privacy of all persons who provide personal data to it and is committed to protecting the data. Based on article 13 of the European Union General Data Protection Regulation (Regulation 679/2016, hereinafter "GDPR"), the company provides the following information:

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.

This Policy sets out the principles for the processing of personal data provided by Users/Subscribers.

The purpose of this Policy is to provide detailed information, during the use of the services provided by the Data Controller (hereinafter referred to as the "Service") to the partners establishing a Client relationship with DSS Consulting Zrt. as the Data Controller (hereinafter referred to as the "Data Controller") or other contracting or cooperating partners (hereinafter referred to as the "Clients") to persons authorized by private Clients and legal entity Clients to use the Services, as well as to the visitors of the website operated by the Company (www. dss.hu - hereinafter referred to as the "Website") (hereinafter collectively referred to as "Data Subjects") on all relevant facts concerning the processing of their personal data, in particular the purposes and legal basis of the data processing, the persons authorised to handle and process the data, the duration of the processing and who has access to the data in accordance with the provisions of the GDPR.

The Company will provide information about any other personal data processing in other information notices, policies or at the time of the data collection.

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.

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:	László Sütő CEO
E-mail:	info@dss.hu
Data protection contact:	László Sütő

1. The range of Data Subjects and the scope of the Policy

The scope of this Policy extends to anyone whose personal data is processed by the Company for business purposes or whose data is provided to the Company. 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 personal scope of this Policy extends to the Company as Data Controller, to the persons whose data are included in the processing covered by this Policy and to the persons whose rights or legitimate interests are affected by the processing.

The Company primarily processes the data of natural persons who electronically, through the Website or by sending their data to the info@dss.hu e-mail address, through a social networking site or by telephone or in person applied to establish a customer relationship, requested a quote, use or request the use of the Company's services (in particular the IT Consultancy service - hereinafter the "Service") or contact the Company or visit the Website for any reason or purpose other than establishing a customer relationship. The Company also processes the data provided by its natural person Clients and by the representatives, contact persons or other employees of its non-natural person Clients.

In the case of Personal Data of Data Subjects where the Data Subject and the person providing the Personal Data relating to the Data Subject are not the same, the person providing the data is responsible for ensuring that he or she has the appropriate authorisation from the Data Subject in respect of the data provided and is obliged to inform the Data Subject of the provisions of this Policy.

The scope of this Policy covers the Company's processing of all personal data on an electronic and/or paper basis.

This Policy is effective from 1 October 2021 until further notice or until revoked. The Company is entitled to amend this Policy unilaterally.

2. Interpretative provisions

For the purposes of this Policy, each of the definitions set out below shall have the following meanings:

“personal data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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;

“data processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording,

organisation, structuring, segmentation, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“data controller" means the Company and the natural or legal person or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

“data processor" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

"recipient" means a natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether or not a third party. Public authorities that may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

"third party": a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;

"the data subject's consent" means a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;

"special data": Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership, genetic data and biometric data revealing the identity of natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons;

"health data" means personal data relating to the physical or mental health of a natural person, including data relating to the provision of health services to a natural person which contains information about the health of the natural person;

“data transfer" means the making available of personal data to a specific recipient;

"privacy incidents": A personal data incident is a breach of security in the processing of personal data that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted or stored or otherwise processed.

Other terms defined by the GDPR are set out in Article 4.

3. Purposes and legal grounds for processing, legal certainty applied, storage of personal data

3.1. General purposes of the processing carried out by the Company:

a.) The processing of data of natural persons provided to the Company in connection with the performance of its activities and the provided Service made available by the users of the Service or, in the case of legal entities, their employees or the Clients, for the preparation, conclusion and performance of contracts, for the performance of legal obligations and the maintenance of customer relations;

b.) Processing of Data Subject's data in connection with the provision of the rights and performance of obligations arising from the contractual relationship (including the use of Services and the fulfilment of orders, as well as the processing of Customer contact details);

c.) Marketing activity to potential Customers on the basis of their consent;

d.) Processing of personal data of potential Customers for direct marketing purposes on the basis of the Company's legitimate interest;

e.) To comply with the legal obligations and enforce the legitimate interests of the Data Subject and the Company;

f.) The transfer of Data Subject's data to business partners, where this is unavoidable, facilitates the provision of the Service to the Data Subject and with the Data Subject's prior consent;

f) Exercise rights and perform obligations arising from the contract or the provision of the Service after the termination of the contract with the Company, in particular to enforce claims based on the contract or arising from the provision of the Service;

g) To improve the quality of the Service, by conducting market research and surveying habits.

3.2. Legal basis for data processing

a.) The legal basis for the processing is primarily the prior, voluntary consent of the Data Subject on the basis of prior information provided by the Data Controller, and the general purpose of the processing is to ensure the provision of the Service and to maintain contact. In addition, the Company processes the data in order to provide the Service, to comply with a legal obligation to which it is subject, or to enforce the legal interests of the parties.

b.) In case of voluntary provision of data by the Data Subject, the Company processes the personal data with the consent of the Data Subject. Voluntary consent on the part of the Data Subject shall also be understood to mean the behaviour by which the Data Subject, by using the Website, accepts that all regulations relating to the use of the Website, including this Policy, shall automatically apply to him or her.

c.) The Data Subject has the right to withdraw his or her consent at any time, however, under the GDPR, if the personal data have been collected with the consent of the Data Subject, the Company may process the collected data, unless otherwise provided by law, for the purpose of complying with a legal obligation to which the Company is subject, or for the purposes of pursuing its own legitimate interests or the legitimate interests of a third party, where such interests are proportionate to the restriction of the right to the protection of personal data, without further specific consent, even after the Data Subject has withdrawn his or her consent. Withdrawal of the consent does not affect the lawfulness of the processing that took place before the withdrawal. In cases provided by law, data processing is mandatory.

d.) In the case of Personal Data of Data Subjects where the Data Subject and the person providing the Personal Data relating to the Data Subject are not the same, the person providing the data is responsible for ensuring that he or she has the appropriate authorisation from the Data Subject in respect of the data provided and is obliged to inform the Data Subject of the provisions of this Policy.

e.) In the case of Services provided by the Company electronically to remote users, to which the recipient of the Service as the Data Subject has individual access, the Company processes the data of the Data Subject as the recipient of the Service for the purposes of concluding the contract for the provision of the Service, proving the conclusion of the contract, invoicing the fees arising from the Service and enforcing any claims relating thereto.

g.) The Company also draws the attention to the fact that in certain cases, the possible consequence of not providing data may be that maintaining business contacts or performing the Service itself may experience increased difficulties, or the provision of data by the Data Subject in the course of certain data management activities may be a condition for the use of the Services provided by the Company.

For certain Services, it is possible to provide additional information to help us fully understand the Data Subject's needs, but this is not a condition of using the Services provided by the Company.

3.3. Scope, limits and basic principles of data processing

The Company will process the Personal Data of Data Subjects only to the extent and for the duration necessary for the purposes set out above. Only personal data may be processed that is necessary for the purpose of the processing and is adequate for the purpose.

The Company will take all necessary measures to ensure that personal data is accurate, complete and up-to-date. However, in view of the fact that the Data Subjects are responsible for the authenticity of the data provided, in the event of a change in their data, the Data Subjects are obliged to notify the Company of the new data as soon as possible after the change, but no later than 3 working days after the change, if necessary, using the contact details indicated in this Policy.

3.4. Source of data

The Company receives the Data Subjects' data either directly from the Data Subjects or from its Clients who provide the Company with the data of their contributors, employees, business partners as Data Subjects.

3.5. Duration of processing

The duration of the processing is as set out below - with the proviso that each processing purpose may set the duration of the processing differently and thus the processing periods detailed in each processing purpose shall prevail.

As a general rule, the duration of data processing is (i) until the achievement of the data processing purpose and the deletion of the personal data, (ii) until the withdrawal of the consent to the processing of the Data Subject's data and the consequent deletion of the Data Subject's personal data, (iii) until the execution of the decision of the competent court/authority on the deletion, (iv) unless otherwise provided by law, until the limitation period for the enforcement of rights and obligations arising from the legal relationship on the basis of which the Company's data processing is based, which is 5 years pursuant to Act V of 2013 on the Civil Code.

In the case of mandatory processing based on legislation, the relevant legislation determines the duration of the processing. Invoices issued must be kept for 8 years in accordance with the provisions of the Act on the Rules of Taxation and the Act on Accounting.

The personal data set out in this Policy will, subject to the exceptions set out in the specific processing purposes, be kept by the Company for the time period set out in the general rule in this Policy and then deleted or, at the request of the Data Subject or in the event of the withdrawal of the Data Subject's consent to the processing of his or her data, deleted.

4. Description of each type of processing

4.1. Processing of visitors' data on the Website

When you access the Website, the server serving the Website may technically automatically record certain data generated during the visit. The data that is automatically recorded is automatically logged by the system when the Data Subject visits the Website (hereinafter referred to as the "User") without any special declaration or action on the part of the Data Subject. The system manages this data for the shortest period of time necessary for the provision of the Service and for the security of its operation - typically less than 1 day - after which the data is overwritten, i.e. deleted. For example, the following data may be stored this way: IP address, browser data, visit parameters.

The purpose of data processing: during the visit to the Website, the Website hosting provider records the visitor's data in order to monitor the operation of the Service and prevent abuse.

Legal basis for processing: voluntary consent of the Data Subject

Scope of the data processed:

Scope of the data processed	purpose of processing
session identifier	identification

Duration of processing: 3 days from the date of accessing the Website.

4.2. 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. The 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.

4.3. Contacting, request information, communication, product support

The Data Subjects can contact the Company via the Website (*Contact menu item*) or request information from the Company by providing certain details. Prospective Clients of the Company may contact directly the Company's designated contact person. Use of the Product Support Point requires acceptance of this Policy.

Scope of Data Subjects: natural persons who contact the Company and request information from the Company by providing personal data.

Legal basis for processing: consent of the Data Subject.

Scope of the data processed	purpose of processing
name	identification
phone number	contacting, maintaining contact
email address	contacting, maintaining contact
date of message	identification

message subject and text	responding, providing information
other personal data provided by the Data Subject	responding, providing information

Duration of processing: the time necessary for the purposes for which the data are processed, which may not exceed 5 years from the date of the communication of the data or the time limit for the exercise of any right of recourse, but not longer than the withdrawal of consent. If no contract or agreement is concluded between the Company and the Data Subject (or the company represented by the Data Subject) following the pre-contractual processing, the Company will delete the message(s) after the communication has been completed - provided that no other processing purpose is fulfilled.

4.4. Data processing related to the Service provided by the Company

4.4.1 IT consultancy

After contacting the Data Controller, you can use the Service by providing additional data or ordering IT consulting services.

Scope of Data Subjects: natural persons establishing a business relationship or legal persons providing data on natural persons.

The purpose of data processing: performance of the contract, provision of services, identification of customers, recording of the data of the services used in accordance with the provisions of the Accounting Act, and contact management.

Legal basis for processing: the Data Subject's consent, the performance of a contract to which the Data Subject is a party, or the performance of a legal obligation

The scope of the data processed and the purpose of the processing:

Scope of the data processed	purpose of processing
name	identification
billing address	identification
phone number	contact keeping
email address	identification, contact keeping
tax number	identification
other personal data provided by the Data Subject	Data required to provide the service
ordered service	necessary for the fulfilment
payment method	necessary for financial performance

The activity and process involved in the processing: the Data Subjects order the service, and after the service has been provided, they pay the fee.

Duration of processing: the period necessary for the purpose of processing, which in some cases corresponds to the term of a contractual relationship or until the expiry of the limitation period for the enforcement of rights and obligations arising from the legal relationship which is the legal basis for the processing, with the condition that for the accounting records, the mandatory retention period is 8 years.

For invoicing purposes, the Company uses the application on the https://www.billingo.hu/ website, as a data processor, the privacy policy of which is available at the following link: https://www.billingo.hu/adatkezelesi-tajekoztato.

4.4.2 Processing of contact data

The Data Controller may process personal data in the course of its business, if such data is transferred to it by the Data Subject or the other contracting party (legal person). The Company presumes that its Clients and Business Partners have appropriate authorisation or consent from the Data Subject in relation to the provided data originating from the natural person.

Scope of Data Subjects: natural persons establishing a business relationship or legal persons providing natural person data and persons acting on behalf of such legal persons.

Source of the Data: the Data Subject or the Company's business partner, the contracting party.

The purpose of data processing is to enable the Data Controller to contact the Client and the Client's employee, contact person - i.e. the Data Subject - directly if necessary, and to maintain contact in matters concerning the Data Controller and the Business Partner.

Scope of the data processed	purpose of processing
name	identification
email address	contact keeping
phone number	contact keeping

Legal basis for processing: The Data Controller processes the data of the Data Subjects in order to maintain contact to the Client. The legal basis for the processing is that it is necessary for the purposes of the legitimate interests pursued by the Data Controller (Article 6(1)(f) of the GDPR).

Duration of data processing: Duration of data processing: the period necessary for the purposes of processing, which may in some cases correspond to the term of a contractual relationship, but not longer than the period until the withdrawal of consent or the period for the exercise of any right of recourse (5 years from the performance of the contract (limitation period) and the period provided for by accounting legislation (8 years from the date of the provision of personal data by the Data Subject, from the preparation of the annual accounts, annual report or accounting statements for the financial year in question.)

4.5. Data processing activities performed by the Company

The Company qualifies in certain cases as a Data Processor in respect of the Service provided to its Clients, in respect of the data provided to it by its Clients as Data Controllers.

The Company undertakes and provides appropriate guarantees to ensure that the data processing activities it carries out as a Data Processor comply with the requirements of the GDPR and that appropriate technical and organisational measures are implemented to ensure the protection of the rights of Data Subjects. Within the scope of this:

- The Company shall process the data on the instructions of the Data Controller, in harmony with the data protection rules and principles and shall take into account the contractual obligations of the Data Controller known to the Data Processor.

- The Company may not modify, delete, copy, link to other databases, use for any purpose other than the underlying contract or for its own purposes, or disclose to third parties the data provided to it by the Data Controller, except to the extent expressly required by the Data Controller and necessary for the purposes of the Processing.

- The Company is not entitled to represent the Controller or to make any statement on behalf of the Controller, unless expressly authorised to do so by an agreement with the Controller or other document.

- The Company stipulates that the Data Controller has the exclusive right to determine the purposes and means of the processing of the data provided to the Data Processor.

- The Company, as the Data Processor, is obliged to ensure the security of the data, to take all technical and organizational measures necessary to enforce data protection rules, and to take appropriate measures against unauthorized access to the data, unauthorized alteration, transmission, disclosure, deletion, destruction of the data. It is also obliged to take appropriate

measures against accidental destruction or damage and against inaccessibility due to technical changes.

- The Company, as the Data Processor, shall provide access to the data only to those of its employees who need it for the purposes of carrying out the processing activities, and shall inform those who have access of the security compliance and confidentiality obligations and ensure that they are bound by confidentiality obligations.

- The Company, as the Data Processor, undertakes to cooperate with the Data Controller in order to enable the Data Controller to comply with its legal obligations. In particular, the cooperation covers the following areas: the execution of requests related to the fulfilment of the Data Subjects' rights of access, erasure and rectification within the legal time limits.

- The Company, as the Data Processor, undertakes to modify, supplement, correct, block or delete the data processed by it in accordance with the instructions of the Data Controller.

- The Company shall promptly notify the Data Controller of any events or risks affecting the security of the data, take measures to address them and cooperate fully with the Data Controller.

- The Company undertakes to cooperate fully with the Data Controller in any audit or investigation of its systems, records, data, information and procedures relating to the processing of data.

- The Company shall delete personal data whose storage and retention is not required by this Policy or by law after the provision of the Service giving rise to the processing has been completed.

The Data Processor shall only be liable to pay compensation if it has not complied with the Controller's instructions or with the provisions of point 4.8 of this Policy or with the legal provisions applicable to the Data Processor. The limit of the liability of the Data Processor for direct and indirect damage caused by the Data Processor to the Data Controller or third parties is limited to the amount of the contractor's fees paid to the Data Processor in the year in which the damage occurred.

The Company reserves the right to engage additional data processors for its data processing activities as set out in this clause, by amending this Policy, which is expressly accepted by the Data Subjects.

4.6. Marketing-related data processing

4.6.1 Data processing in relation to sending newsletters

The Data Subject may subscribe to a newsletter before or during the use of the services or otherwise by providing the following information. When subscribing to the newsletter, the Company also records the date of subscription and the e-mail address. The Company will send a confirmation email about the subscription to the newsletter to the address from which the newsletter was requested, in order to prevent identification and abuse.

Legal basis for data processing: subscription to the newsletter is based on voluntary consent. The Data Subject is not obliged to consent to the processing. If the Data Subject does not consent to the processing of the data, he/she will not receive the Company's newsletters, commercial and informative letters. In the case of unsolicited marketing enquiries, the processing of personal data for direct marketing purposes may be considered to be based on the Company's legitimate interest.

The scope of Data Subjects: any natural person or natural person acting on behalf of a legal person who wishes to receive regular news from the Company and who, by providing their personal data, subscribes to the newsletter service.

Purpose of the processing: the purpose of the processing in connection with the sending of newsletters is to inform the Data Subject in a general or personalised manner about the latest events, news, promotions, new features or products and Services of the Company.

Scope of the data processed	purpose of processing
name	identification
email address	sending newsletter
date of subscription	identification, technical operation

Duration of data processing: until erasure at the Data Subject's request, i.e. until the Data Subject's consent is withdrawn. The Company processes personal data collected for this purpose only until the data subject unsubscribes from the newsletter list. The Data Subject may unsubscribe from the newsletter at any time by using the contact details provided in the newsletter, by visiting the newsletter provider's website or by sending an unsubscribe request to info@dss.hu. The Data Subject may unsubscribe by post at the address given in this Policy.

The Company uses MailChimp, an online marketing platform operated by The Rocket Science Group LLC d/b/a, to send newsletters. In this capacity, Mailchimp as a platform is considered a data processor, and its data processing activities are related to the provision of technical support. Mailchimp is currently a registered member of the EU-US Privacy Shield agreement and has an active status (for more information, see (https://www.privacyshield.gov/participant?id=a2zt0000000T06hAAG&status=Active, and has declared its compliance with the European Commission's Standard Contractual Clauses (SCCs) for data transfers.

The Mailchimp Terms of Service Notice and Mailchimp Privacy Statement are available at https://mailchimp.com/legal/privacy/, Mailchimp's address: The Rocket Science Group LLC (Mailchimp) (675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA; more information is available at https://mailchimp.com/contact/, for EU citizens: Bird & Bird GDPR Representative Services Ireland Deloitte House 29 Earlsfort Terrace Dublin 2 D02 AY28 EUrepresentative.Mailchimp@twobirds.com

MailChimp inserts a special meter code in the mail sent. The purpose of the metering code is to measure the opened status of the emails in order to provide the Company with information on

whether the emails were successfully delivered and opened, and to assess the usage patterns of the sent newsletters, so that the Company can send more favourable messages to the Data Subjects by sending future newsletters.

4.6.2 Data processing related to social networking sites

The Company is present on the Facebook community portal and other social networking sites (LinkedIn/Instagram). The primary purpose of the content placed on these pages is to present the Service, share, publish and market the content on the Website on social networking sites. Through the social networking site, Data Subjects can find out about the latest products, the Service, and any promotions and news from the Company.

In the course of its activities, the Company may process the names and public data of the Data Subjects registered on the Facebook/Google+/Twitter/LinkedIn/Pinterest/YouTube/Instagram etc. social networking sites connected to the DSS Consulting website who "like" the Company's social networking site on the social sites, for the purpose of sharing or "liking" and promoting certain content elements, products, promotions or the social networking site itself. The Company communicates with the Data Subjects through the social networking site and thus the purpose of the scope of the data processed becomes relevant only if the Data Subject contacts the Company through this forum, i.e. the social networking site.

Legal basis for processing: contacting, communicating with the Company within and through the social networking sites and other operations permitted by the social networking site is based on voluntary consent. Based on the terms and conditions of the social networking site, the Data Subject voluntarily consents to follow and like the Company's content.

The scope of Data Subjects: natural persons who follow, share or like the social networking sites of the Data Controller or the content thereof.

Scope of the data processed	purpose of processing
name	identification
public data	identification
message	contact keeping
email address	contact keeping

The Company may link a particular social networking site to other social networking sites in accordance with the rules applicable to that social portal. The Data Subject may obtain information on the data processing, the source of the data, the processing of the data, the method of transfer and the legal basis of the transfer on the relevant social networking site. The relevant data processing is carried out on social networking sites, so the duration of the data processing, the

method of data processing and the possibility to delete and modify the data are governed by the rules of the relevant social networking site.
The Company may link the Facebook page to other social networking sites in accordance with the rules of the facebook.com social networking site, so posting on the Facebook page shall be deemed to include posting on such linked social networking sites.

The Data Subject may obtain information about the data processing of the relevant social networking site on the relevant social networking site.

Duration of data processing: until erasure at the request of the Data Subject.

4.7. Claims management

Claims management includes all actions taken to recover the Company's legitimate claims and receivables.

Data Subjects concerned: persons against whom the Company has an overdue claim or persons whom the debtor companies (Clients) provide as contact persons for the purpose of enforcing claims.

Purpose of data processing: identification of Clients, contact management

Legal basis for processing: legitimate interest of the Company, consent

Scope and purpose of the data processed: name, email, address, telephone number, billing or postal address

Source of the data: the Data Subject, or a Client of the Company

Duration of data processing: the time limit for making a claim, or, in the case of administrative/litigation or non-litigation procedures, the duration of such procedures

5. Persons authorized to have access

Only employees of the Company who need to have access to the data in order to perform their job duties are entitled to access the data. Persons who have access to personal data at the Company are bound by confidentiality obligations with regard to the personal data of the Data Subjects, i.e. they are obliged to treat personal data and other information obtained in the course of their duties or otherwise as confidential and not to disclose it to third parties.

6. Data security

The Company shall ensure that the data security rules provided for in the applicable legislation are applied. When defining and applying measures to ensure data security, the Company takes into account the state of the art and chooses among several possible data processing solutions the one that ensures a higher level of protection of personal data, unless this would imply a disproportionate level of difficulty. The Company shall take the technical and organisational measures and establish the procedural rules necessary to enforce the applicable laws, data protection and confidentiality rules. The Company shall take appropriate measures to protect the data against unauthorised access, alteration, forwarding, disclosure, deletion or destruction, accidental destruction or damage, and against inaccessibility resulting from changes in the technology used. The Company will ensure that the relevant employees are adequately trained to ensure that the conditions of data security are met. The Company shall provide the level of protection required for the processing of the data, in particular their storage, rectification and erasure, in the event of a request for information or an objection by the Data Subject.

7. Storage of personal data, data processing

As a general rule, personal data is stored electronically. The Data Controller stores all personal data on a highly secure cloud system in Microsoft Azure, which complies with the specifications of GDPR and is committed to following the European Commission's Standard Contractual Clauses (SCCs) for data transfers. For more information see https://www.microsoft.com/en-us/trust-center/privacy.

8. Data processing, data transfer

The Company uses the services of third parties to achieve the data management purposes set out in this Policy, to comply with legal obligations and to perform its tasks, which may include the processing of the Data Subjects' personal data. This third party (hereinafter referred to as "Data Processor") shall carry out the processing in accordance with the instructions of the Company and in compliance with the provisions of the applicable legislation. For the purposes of processing, personal data are only transferred to individual Processors for the purposes necessary for the fulfilment of that purpose.

List of Data Processors who process data for the Company:

- MULTIRAM Ltd. (1134 Budapest, Kassák L. utca 56.) accounting services
- Billingo Technologies Zrt. / billingo.hu (1133 Budapest, Árbóc utca 6.) billing service

9. Handling data protection incidents

The Company makes every effort to avoid data protection incidents. A data protection incident is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

The Data Controller shall immediately notify the National Authority for Data Protection and Freedom of Information of the data protection incident, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of the Data Subjects. The Data Controller shall keep a record of the data protection incidents, together with the actions taken in relation to the incidents. Where the incident is serious (i.e. likely to result in a high risk to the rights and freedoms of the Data Subject), the Data Controller shall inform the Data Subject of the personal data protection incident without undue delay.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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