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BITRIAL KFT.

EXTERNAL

PRIVACY POLICY

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Issued by:

Dr János Bíró
Executive Director
BITRIAL Kft.

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2 INTRODUCTION

BITRIAL Kft. (1121 Budapest, Tállya utca 23.), as **controller**, acknowledges that it is bound by the contents of this legal notice. It undertakes to ensure that all data processing in connection with its activities shall meet the requirements of this policy and the provisions of relevant legislation. The data protection directives of BITRIAL Kft. in relation to its data processing is available on an ongoing basis at <https://www.bitrial.hu> under the Privacy Policy menu (<https://www.bitrial.hu/adatvedelmi-tajekoztato>).

BITRIAL Kft. reserves the right to change this policy at any time, subject to the traceability and availability of any amendments.

In order to protect the privacy of its dedicated customers and partners, BITRIAL Kft. attaches particular importance to respecting its clients' rights to informational self-determination. BITRIAL Kft. shall handle personal data confidentially and shall take all the security, technical, and organisational measures necessary to guarantee the security of the data.

BITRIAL Kft. sets out its data management practices with respect to EXTERNAL parties below:

2.1 THE LEGAL REGULATORY ENVIRONMENT FOR THE PROCESSING OF PERSONAL DATA

The data processing activities of BITRIAL Kft. is based on voluntary consent. However, in certain cases the processing, storage, and forwarding of certain parts of the data are required by law, about which we will information the public separately.

We call the attention of the parties disclosing data to BITRIAL Kft. that if they do not provide their own personal data, it is the responsibility of the data provider to obtain the consent of the data subject.

The data management principles of BITRIAL Kft. are in compliance with the applicable data protection legislation, thus in particular:

- 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 (the General Data Protection Regulation or GDPR);
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Information Act)
- Act V of 2013 on the Civil Code (Civil Code)
- Act CLV of 1997 on Consumer Protection (Consumer Protection Act)
- Act XIX of 1998 on Criminal Procedures (Code of Criminal Procedures)
- Act C of 2000 on Accounting (Accounting Act)
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Services

(e-Commerce Act)

- Act C of 2003 on Electronic Communications (e-Communications Act)
- Act CXXXIII of 2005 on Personal and Property Security and Private Investigation Activities (Security Services Act)
- Act XLVIII of 2008 on Certain Restrictions of Economic Advertising Activities (Economic Advertising Act)

2.2 Definitions

Controller shall mean natural or legal person, or organisation without legal personality which alone or jointly with others determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor;

Data processor shall mean any natural or legal person or organisation without legal personality processing the data on the grounds of a contract, including contracts concluded pursuant to legislative provisions;

Data incident shall mean the unlawful processing or process of personal data, in particular the illegitimate access, alteration, transfer, disclosure, deletion or destruction as well as the accidental destruction or damage;

Data subject shall mean any natural person directly or indirectly identifiable by reference to specific personal data;

Profiling shall mean any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

Personal Data: data relating to the data subject, in particular by reference to the name and identification number of the data subject or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity as well as conclusions drawn from the data in regard to the data subject.

3 THE MANNER OF STORING PERSONAL DATA; PROCESSING

- Taking into account the state of the art, the costs of implementation, the nature, scope, circumstances, and purpose of data processing, and the risks of variable probability and severity reported for the rights and freedoms of private persons, BITRIAL Kft. and its processors put suitable technical and organizational measures in place in the interest of guaranteeing a suitable level of data security in line with the degree of risk.
- BITRIAL Kft. selects and operates the IT tools used for the processing of personal data during the course of providing the service in a manner that ensures that the processed data:
 - are accessible to the authorized persons (availability);
 - are authentic and certified (authenticity of data processing);
 - can be certified as unchanged (data integrity);
 - is protected against unauthorized access (data confidentiality)
- BITRIAL Kft. uses suitable measures to protect the data, thus especially from unauthorized access, alteration, forwarding, disclosure, deletion, destruction, unintentional destruction, damages, and inaccessibility due to changes to applied technologies.
- In the interest of protecting the data files stored in its various electronic records, BITRIAL Kft. uses suitable technical solutions to ensure that the stored data cannot (unless permitted by law) be directly combined and traced back to the data subject.
- In line with the respective state of the art, BITRIAL Kft. uses technical and organizational measures to protect the security of data processing which provides a level of protection that corresponds to the risks incurred in connection with data processing.
- During the course of data processing, BITRIAL Kft. preserves
 - **confidentiality:** it protects the information so only authorized persons can access it;

- o **integrity:** it protects the accuracy and entirety of the information and the processing method;
- o **availability:** it ensures that when the authorized user so requires, it can access the desired information and the tools necessary therefor are available.
- The IT system and network used by BITRIAL Kft. and its partners are protected against computer-based fraud, espionage, sabotage, vandalism, fire, flood, computer viruses, hacking, and attacks aimed at refusal of service. The operator uses server and application-level protection procedures to ensure security. We would like to inform users that electronic messages forwarded over the internet are, regardless of protocol (email, web, ftp, etc.), are vulnerable to threats that lead to unfair activities, contractual disputes, or the disclosure or amendment of information. The controller takes all the precautions that can be expected of it to provide protection against such threats. It monitors the systems in the interest of recording all security deviations and providing evidence in connection with all security incidents. Additionally, system monitoring makes it possible to check the effectiveness of the applied precautions.
- As controller, BITRIAL Kft. keeps records of any possible data protection incidents, including the facts in connection with the data protection incident, their effects, and the measures taken to remedy those.
- BITRIAL Kft. will, without delay and, if possible, no later than 72 hours after having learned of the data protection incident, report any data protection incidents to the Hungarian National Authority for Data Protection and Freedom of Information, unless the data protection incident is assumed to not have any risks pertaining to the rights and obligations of any natural persons.
- The User is solely responsible for the veracity and accuracy of the data provided by the User. BITRIAL Kft. shall not be liable for any omissions in the data provided or for any consequences arising from incorrectly provided data, and expressly excludes its liability in this respect, but provides the possibility of modification to the data subject in respect of the personal data provided by him/her.
- All data processing is governed by the fact that our Company does not process the data erased by itself or by the User after such erasure, and removes them from its database.

4 THE DATA AND CONTACT INFORMATION OF THE DATA PROCESSOR

| | |
|---------------------------|---|
| Name: | BITRIAL Kft. |
| Seat: | 1121 Budapest, Tállya utca 23. |
| Commercial register code: | 01-09-190865 |
| Court of registration: | Metropolitan Court of Budapest, as Court of Registry |
| VAT number: | 13533256-2-43 |
| Phone: | +36 (1) 800 8063 |
| Email: | info@bitrial.hu |

5 POSSIBILITIES FOR LEGAL REMEDY

The data subject may request information on the processing of its personal data and may request that its personal data be rectified or – with the exception of the cases where data processing is compulsory – erased, its consent be withdrawn, data processing be restricted, and may exercise its right of data portability and objection, in the manner indicated at the time the data was recorded and through the controller's customer service.

5.1 Right to request information:

Under **Articles 13 and 14**, at the data subject's request, BITRIAL Kft. shall take appropriate measures to provide the data subject with all the information under **Articles 13 and 14 of the GDPR** pertaining to the processing of personal data and the information under **Articles 15-22 and 34** in a transparent, intelligible and easily accessible form, using clear and plain language.

Therefore, the data controller shall ensure that the data subjects are informed in a timely and appropriate manner and in accordance with the requirements by preparing the information of BITRIAL Kft., designing, regulating, and maintaining data management processes.

5.2 The right of access of the data subject:

Under Article 15, 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 following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; the envisaged period for which the personal data will be stored; the right to request rectification or erasure of personal data or restriction of processing; the right to lodge a complaint with a supervisory authority; any available information as to the source of personal data; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data are forwarded to a third country or an international organization, the data subject is entitled to receive information on the suitable guarantees pertaining to such forwarding.

- BITRIAL Kft. shall make a copy of the personal data subject to data processing available to the data subject.
- The controller may charge the data subject a reasonable fee based on administrative costs for any additional copies requested.
- At the request of the data subject, BITRIAL Kft. shall provide such information in electronic format.
- The right to information may be exercised in writing by way of the channels specified in the Introduction and **point 3**.
- At the data subject's request, information may also be provided verbally, after the credible identification of identity.

5.3

5.4 Right to rectification:

Under Article 16, at the request of the data subject, taking into account the purposes of data processing, BITRIAL Kft. shall rectify personal data if it is inaccurate and if it has at its disposal accurate personal data.

5.5 Right to erasure:

Under Article 17, if any of the reasons are met, the data subject may obtain from BITRIAL Kft. the erasure of personal data concerning him or her without undue delay:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which processing is based and there are no other legal grounds for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

5.5.1 The erasure of data cannot be initiated if processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject;
- for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for archiving, scientific and historical research purposes, or for statistical purposes in the public interest in the field of public health;
- for the establishment, exercise, or defence of legal claims.

5.6 Right to restriction of processing:

Under Article 18, the data subject shall have the right to obtain from BITRIAL Kft. restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the data controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, the 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.

BITRIAL Kft. shall inform the data subject before the restriction of processing is lifted.

5.7 Right to data portability:

Under Article 20, 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 and to transmit those data to another controller.

5.8 The right to object:

Under Article 21, 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 necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions.

In case of an objection, the controller shall no longer process the personal data unless there are 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.

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, BITRIAL Kft. will no longer process the personal data for such purposes.

5.9 Automated individual decision-making, including profiling:

Under Article 22, the data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right shall not apply if the processing is necessary for entering into, or performance of, a contract between the data subject and a data controller; is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or is based on the data subject's explicit consent.

5.10 Right to withdraw consent

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

5.11 Procedural rules:

Under Article 12(3), the controller shall provide information on action taken on a request under Articles 15 to 22 of the GDPR to the 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 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 and seeking a judicial remedy.

BITRIAL Kft. shall provide the requested information free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

The controller shall provide a copy of the personal data undergoing processing. The controller may charge the data subject a reasonable fee based on administrative costs for any additional copies requested. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in an electronic format.

5.12 Compensation and restitution:

Any person who has suffered material or non-material damage as a result of an infringement of the Data Protection Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of law specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller. Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damages. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

5.13 Complaints to the Data Protection Officer (DPO)

If you have any questions or concerns about the processing of data by BITRIAL Kft., please contact our Data Protection Officer:

| | |
|----------------|-------------------------|
| Company name: | BITRIAL Kft. |
| Phone: | +36 (1) 800 8063 |
| Email address: | dpo@bitrial.hu |

5.14 Right to turn to court:

Data subjects whose rights have been violated may turn to a court of law against the controller (with jurisdiction at the registered seat of the defendant or at the data subject's home address, at the data subject's discretion). The court shall review the case in an expedited procedure. Lawsuits launched regarding the protection of personal data are duty-free.

5.15 Procedures of the data protection authority:

Complaint may be filed at the Hungarian National Authority for Data Protection and Freedom of Information: Name: Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information] 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

6 AN ITEMISED LIST OF THE PROCESSING OF PERSONAL DATA

6.1 DATA PROCESSING OF SITES

6.1.1 The public WiFi services provided by BITRIAL Kft.

The following provide internet access services to the guests of BITRIAL Kft. at its sites, by way of a WiFi connection:

- DIGI Távközlési és Szolgáltató Kft. (1013 Budapest, Krisztina körút 39.)
- LANGATON Hungary Kft. (1107 Budapest, Fertő utca 8., VAT number: 14475494-2-42)

The data subject should note that the use of the free WiFi network is subject to a time limit. The WiFi service deletes guest connections every day at 12:00 am. By connecting to the WiFi network, guests consent to BITRIAL Kft. monitoring the duration of connections based on the unique network identifiers (MAC address) of their devices. After 2 hours following 30 minutes of inactivity, the connection details will be deleted. BITRIAL Kft. does not monitor or record the WiFi traffic of the data subjects.

The guest WiFi service will separate connections by applying appropriate firewall rules and settings.

The controller of the personal data: BITRIAL Kft.;

The purpose of data processing: to provide the Public (Guest) WiFi service;

The legal basis for data processing: Consent-based processing given through the use of the service;

The type of personal data processed: the network unique identifier (MAC address) of the **connected IT device**, the IP address provided by the system, the time of connection and the last active activity, and the topology of the network communication channel;

The duration of data processing: 2 hours 30 minutes, but no more than one day;

Data processor: none.

| Name | Registered seat | The role of the data processor |
|-----------------|---------------------------|--------------------------------|
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | IT system operator |
| | | |

6.2 PROPERTY PROTECTION

6.2.1 Electronic surveillance system

BITRIAL Kft. operates a closed-circuit electronic surveillance and recording system at its premises and warehouses, with cameras installed at the entrances and exteriors of the buildings, along the internal pathways of BITRIAL Kft. and at the entrance gate.

The controller of the personal data: BITRIAL Kft.

The purpose of data processing: to prevent and detect infringements, to catch the possible perpetrator in the act and to prove the infringements, to identify unauthorised persons entering the premises, to record the fact of entry, to document the activities of unauthorised persons, and to investigate the circumstances of any accidents at work and other accidents, in order to protect human life, physical integrity, and property.

The legal basis for data processing: in the case of guests, the consent of the data subject given by entering the restaurant; in the case of employees, Section 11 of Act I of 2012 on the Labour Code (Labour Code) and Article 6(1)(f) of the GDPR, as BITRIAL Kft. has a legitimate interest in the protection of property.

The type of personal data processed: facial images and other personal data of persons entering the premises and the warehouse and using internal routes, as recorded by the surveillance system.

The duration of data processing: thirty (90) days, unless the data are used

Data Processor:

| Name | Registered seat | The role of the data processor |
|-----------------|----------------------------------|---|
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | IT system operator |
| Süvegh Kft. | 2013 Pomáz, Kodály Zoltán u. 25. | electronic surveillance system operator |

Use of the recordings:

The parties entitled to access the current images of the cameras: the authorised employees of BITRIAL Kft. and Süvegh Kft.

The parties entitled to access the recordings made by the cameras: the authorised employees of BITRIAL Kft. and Süvegh Kft.

The parties authorised to copy camera recordings to data media: the authorised employees of BITRIAL Kft.

The recordings stored in the CCTV surveillance and recording system operated by BITRIAL Kft. may only be viewed by authorised persons for the purpose of proving violations of human life, bodily harm, and property and identifying the perpetrator.

A data subject whose right or legitimate interest is affected by the recording of an image may request that the controller does not destroy or erase the recording by justifying his or her right or legitimate interest, until the request of a court or public authority request, but for a maximum of 30 days. The person in the recording may request information about the recording made of him or her by the electronic surveillance system, request a copy of the recording or, if the recording includes other persons as well, obtain access to the recording. The data subject may request the deletion of recordings made of him/her and the rectification of the data relating to the recordings, and may object to the processing of the data.

The controller shall keep a record of the access to the recorded data, the name of the person who accessed the recorded data, the reason for access, and the time of access.

Data transfer: in the case of misdemeanours or criminal proceedings, data are transferred to the authorities or courts conducting them.

Scope of data transmitted: recordings made by the camera system and containing relevant information.

The legal basis for data transfer: Section 71(1), 151(2)(a), and 171(2) of the Code of Criminal Procedures, and Section 75(1)(a) and 78(3) of the Accounting Act

6.2.2 Electronic access control system

BITRIAL Kft. operates a secure electronic card access and locking system at its sites and warehouses, which includes contactless card readers at the entry points of protected zones.

The controller of the personal data: BITRIAL Kft.

The purpose of data processing: Identification of persons gaining access, regulation of those authorised to access with the use of multi-factor identification, and the prevention and detection of breaches and the recording of access in the interest of protecting assets.

The legal basis for data processing: in the case of employees, Section 11 of Act I of 2012 on the Labour Code (Labour Code) and Article 6(1)(f) of the GDPR, as BITRIAL Kft. has a legitimate interest in the protection of property.

The type of personal data processed: The unique identification key of the identification card issued to the person entering the security zone and used by the duly authorised person, and the time of entry as specified by the server.

The duration of data processing: one year (365 days), unless the data are used

Data Processor:

| Name | Registered seat | The role of the data processor |
|-----------------|----------------------------------|---|
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | IT system operator |
| Süvegh Kft. | 2013 Pomáz, Kodály Zoltán u. 25. | electronic surveillance system operator |

Use of the recordings:

The parties entitled to access the access control system: the authorised employees of BITRIAL Kft. and Süvegh Kft.

The parties entitled to modify the access control system and erase data: the authorised employees of BITRIAL Kft. and Süvegh Kft.

The parties authorised to copy access control system data to data media: the authorised employees of BITRIAL Kft.

Data transfer: in the case of misdemeanours or criminal proceedings, data are transferred to the authorities or courts conducting them.

Scope of data transmitted: card use data made by the access control system and containing relevant information.

The legal basis for data transfer: Section 71(1), 151(2)(a), and 171(2) of the Code of Criminal Procedures, and Section 75(1)(a) and 78(3) of the Accounting Act

6.3 THE DATA PROCESSING OF www.bitrial.hu

6.3.1 Logging of the www.bitrial.hu server

The data controller: BITRIAL Kft. (1121 Budapest, Tállya utca 23.).

The web server does not record user data when visiting the www.bitrial.hu website.

Data processing in connection with logging performed by third-party controllers:

The site's HTML code contains links independent of BITRIAL Kft. that arrive from and lead to external servers. The third-party controller's computer is directly connected to the user's computer. Visitors should note that the controllers of these links collect user data (e.g. IP address, browser, operating system data, mouse movements, the addresses of visited pages, and the time and date of the visit) for the purposes of ensuring a direct connection to their server and for directly communicating with the user's browser in accordance with the parameters specified in the section on cookies.

Any content tailored to the user is provided by the server of the third-party controller. The following controllers can provide detailed information on the processing of data by the servers of third-party controllers.

www.bitrial.hu uses the Google Analytics server as a third-party data controller for the independent measurement and auditing of website traffic and other web analytics data. As a third-party controller on the website, the controller at www.maps.google.com displays map information. The controller provides detailed information on the processing of measurement data at <http://www.google.com/intl/hu/policies/>.

6.3.2 Research on the www.bitrial.hu website

The data controller: BITRIAL Kft. (1121 Budapest, Tállya utca 23.).

In the interest of a higher level of service, BITRIAL Kft. conducts user research at www.bitrial.hu using popup windows.

The purpose of data processing: to understand the user's purposes for visiting the website. **The legal basis for data processing:** the data subject's voluntary consent.

The type of personal data processed: identification number (stored on the user's computer by means of a cookie), the address of the page visited, the date and time of the visit, the user's computer and browser data, the screen resolution, language settings, and the identification number derived from the IP address of the user's computer

The sphere of data processed: identification number (stored on the user's computer by means of a cookie), the address of the page visited, the date and time of the visit, the user's computer and browser data, the screen resolution, language settings, and the identification number derived from the IP address of the user's computer

The duration of data processing: 30 days.

Data Processors:

| Name | Registered seat | Data processing task |
|-----------------|---|-----------------------------------|
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | Technical operator of the website |
| 23VNet Kft. | 1094 Budapest, Liliom utca 24-26. II/5. | hosting service provider |

6.3.3 Cooke management by the www.bitrial.hu website

The data controller: BITRIAL Kft. (1121 Budapest, Tállya utca 23.).

In the interest of tailored service, the controller saves small data packets called cookies on the user’s computer, which it reads during subsequent visits to the site. If the browser returns a cookie that had been previously saved, the controller handling the cookie has the option to connect the user’s current visit with previous visits, but only as regards its own content.

The purpose of data processing: identification and differentiation of users, identification of users' current session, storage of data provided during the session, prevention of data loss, identification and tracking of users, web analytics measurements (week_42_visits).

The legal basis for data processing: the controller has a legitimate interest in the identification of users and providing personalised service [Article 6(1)(f) of the GDPR].

The sphere of data processed: identification number, date, time, and the page previously visited.

The duration of data processing: one week

Data Processors:

| Name | Registered seat | Data processing task |
|-------------------------------|--|---|
| OBDigital - WPCreativeLab LLC | Kassa street 49., Budapest, Hungary 1185 | Website development |
| 23VNet Kft. | 1094 Budapest, Liliom utca 24-26. II/5. | hosting service provider |
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | Performing backups on the website, development and database-related tasks |

Cookies with specific validities (permanent cookies) are stored on the computer until deleted, but no later than until the expiry of their validity.

Users can delete cookies from their own computers and can block the use of cookies in their browsers. Cookies can generally be managed in the Tools/Settings menus of browsers, under Data protection/History/Personal settings, where they are referred to as cookies or tracking.

A cookie is a variable alphanumeric packet of information sent by a web server that is saved on the user’s computer where it is stored for a predefined period of time. The use of cookies allows the possibility to retrieve certain information about the visitor and to track his/her internet usage. Cookies can therefore be used to precisely determine the interests, internet usage habits, and website visit history of the data subject. Because cookies act as a kind of tag that allows the website to recognise a visitor returning to the site, they can also be used to store the username and password valid for that page. If, during a visit to the website, the user's browser returns a cookie previously saved on the hard disk, the controller sending the cookie can link the current visit to previous visits, but since cookies are linked to the domain, it can only do so in respect of its own content. Cookies are not in themselves able to identify the user, they are only able to recognise the visitor's computer.

6.3.4 Management of research-related cookies on the www.bitrial.hu website

The data controller: BITRIAL Kft. (1121 Budapest, Tállya utca 23.).

In order to carry out the task described in point 5.3.3 of this information, the controller places a small data package, called a cookie, on the user's computer and reads it back during any subsequent visits. If the browser returns a cookie that had been previously saved, the controller handling the cookie has the option to connect the user's current visit with previous visits, but only as regards its own content.

The purpose of data processing: to identify and distinguish users, to identify the current sessions of users, to store the data provided during such sessions, and to prevent data loss.

The legal basis for data processing: the data subject's consent

The sphere of data processed: identification number, date, time, device behaviour.

The duration of data processing: 365 days.

Data Processors:

| Name | Registered seat | Data processing task |
|-------------------------------|--|----------------------|
| OBDigital - WPCreativeLab LLC | Kassa street 49., Budapest, Hungary 1185 | Website development |

A cookie is a variable alphanumeric packet of information sent by a web server that is saved on the user's computer where it is stored for a predefined period of time. The use of cookies allows the possibility to retrieve certain information about the visitor and to track his/her internet usage. Cookies can therefore be used to precisely determine the interests, internet usage habits, and website visit history of the data subject. Because cookies act as a kind of tag that allows the website to recognise a visitor returning to the site, they can also be used to store the username and password valid for that page. If, during a visit to the website, the user's browser returns a cookie previously saved on the hard disk, the controller sending the cookie can link the current visit to previous visits, but since cookies are linked to the domain, it can only do so in respect of its own content. Cookies are not in themselves able to identify the user, they are only able to recognise the visitor's computer.

| Controller | Cookie name | Cookie ID |
|--|--------------------------------|------------|
| www.google.com/analytics | _ga _gat _gid _gcl_au | FEY08W6GCL |
| https://www.hotjar.com/ | _hjSessionUser _hjSession_ | 3536147 |
| https://polylang.pro/ | pll_language | EN |

6.3.5 Cookie management by third-party controllers on the www.bitrial.hu website

Some data processing partners place a small data package, called a cookie, on the user’s computer for the purpose of identifying and tracking users, and read it back during subsequent Internet use. If the browser returns a previously saved cookie, the data controller handling the cookie has the possibility to link the user’s current visit to previous visits to websites where the cookie of the third-party controller is used.

When visitors visit the www.bitrial.hu website, Google Analytics uses a cookie to operate its web analytics system. More information on the data processing of www.google.com/analytics is available at the <http://www.google.com/intl/hu/policies> website.

The document "How Google uses information from sites or apps that use our services" is available at the link below: <http://www.google.com/intl/en/policies/privacy/partners/>

Users can delete cookies from their own computers and can block the use of cookies in their browsers. Cookies can generally be managed in the Tools/Settings menus of browsers, under Data protection/History/Personal settings, where they are referred to as cookies or tracking.

The following third-party controllers have placed the following cookies on the website:

| Controller | Cookie name | Cookie ID |
|--|--------------------------------|------------|
| www.google.com/analytics | _ga _gat _gid _gcl_au | FEY08W6GCL |
| https://www.hotjar.com/ | _hjSessionUser _hjSession_ | 3536147 |
| https://polylang.pro/ | pll_language | EN |

A cookie is a variable alphanumeric packet of information sent by a web server that is saved on the user’s computer where it is stored for a predefined period of time. The use of cookies allows the possibility to retrieve certain information about the visitor and to track his/her internet usage. Cookies can therefore be used to precisely determine the interests, internet usage habits, and website visit history of the data subject. Because cookies act as a kind of tag that allows the website to recognise a visitor returning to the site, they can also be used to store the username and password valid for that page.

If, during a visit to the website, the user's browser returns a cookie previously saved on the hard disk, the controller sending the cookie can link the current visit to previous visits, but since cookies are linked to the domain, it can only do so in respect of its own content. Cookies are not in themselves able to identify the user, they are only able to recognise the visitor's computer.

6.3.6 Data processing by the bitrial.hu website on the contact page

The data controller: BITRIAL Kft. (1121 Budapest, Tállya utca 23.).

In order to provide a tailored service, the controller provides customers (data subjects) with an easy-to-use and secure interface to contact the user, provide further information, and answer any questions.

The controller asks for the data solely for the purpose of contact, does not pass them on to third parties, and does not use them for any other marketing purposes.

The purpose of data processing: to contact the data subject by telephone and email.

The legal basis for data processing: processing based on consent pursuant to Article 6(1)(a) GDPR.

The sphere of data processed: name, email address, message, phone number

Duration of processing: the data provided by the data subject will be stored until revoked, but for no more than one year.

Data Processors:

| Name | Registered seat | Data processing task |
|-------------------------------|--|--|
| OBDigital - WPCreativeLab LLC | Kassa street 49., Budapest, Hungary 1185 | Website developer |
| 23VNet Kft. | 1094 Budapest, Liliom utca 24-26. II/5. | hosting service provider |
| Microsoft Office 365 | Microsoft Magyarország Kft., 1031 Budapest, Graphisoft Park 3. (Záhony u.) | providing a mail service and storing electronic mail and documents |

The term of the retention period is defined by the legitimate interest of the controller to be able to provide proof of recalls and the related costs in case of a possible administrative investigation.

The term of the retention period is defined by the legitimate interest of the controller and the data processor to be able to provide proof of conversations and the related costs in case of a possible administrative investigation.

If the user (visitor, data subject) enters into a contract with the processor, the data processing is modified as follows:

New controller: BITRIAL KFT.

The purpose of data processing: Operating the business, by written agreement between the contracted partners.

The legal basis for data processing: processing based on the performance of a contract and a legal obligation [Article 6(1)(b) and (c) GDPR].

The sphere of data processed: first and last name, phone number, email address, company name; tax number, commercial register code, billing address, delivery address, contact person, data necessary to identify the sender and the recipient, other technical data necessary for the performance of the task (e.g. doorbell number).

The duration of data processing: the data provided by the data subject will be stored for eight years, in accordance with the Accounting Act.

6.4 CONTACTING THE CONTROLLER

6.4.1 The client correspondence of BITRIAL Kft.

If you wish to contact our Company, you can contact the controller do so using the contact details provided in this document, on the website, and under the “Contact” section on www.bitrial.hu. After no more than five years from the time of disclosure, BITRIAL Kft. deletes all emails it received, including the sender’s name and email address, the date and time, and any other personal data included in the message.

After no more than 10 years from the time of disclosure, BITRIAL Kft. deletes all emails it received, including the sender’s name and email address, the date and time, and any other personal data included in the message. In addition, all emails we send out contain the following information:

“BITRIAL Kft. processes the personal data of data subjects in accordance with point 5.4.1 of its Privacy Policy prepared in line with Regulation (EU) 2016/679 (GDPR) and the relevant provisions of Act CXII of 2011, as amended (see the “Data protection” menu item at www.bitrial.hu).”

The controller of the personal data: BITRIAL KFT.

The purpose of data processing: contact and communication by email in the course of business processes.

The legal basis for data processing: processing based on consent through the use of the service and for the purposes of ensuring the controller's legitimate interest in providing evidence.

The type of personal data processed: the sender’s name, telephone number, email and address, date values, and other time data, as well as other personal data and information provided in the message.

The duration of data processing: 10 years.

Data Processors:

| Name | Registered seat | Data processing task |
|----------------------|--|---|
| BITRIAL Kft. | 1121 Budapest, Tállya utca 23. | The controller using the electronic mail system |
| Microsoft Office 365 | Microsoft Magyarország Kft., 1031 Budapest, Graphisoft Park 3. (Záhony u.) | providing a mail service and storing electronic mail and documents |
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | Ensuring 24/7 and night-time operation of electronic mail systems, operating a secure mail filtering system |

6.4.2 Applying for job vacancies

BITRIAL Kft., as employer, does not advertise jobs on its own, but uses the services of recruitment agencies, who are the data controllers, and BITRIAL Kft., as joint controller, process the personal data sent by the recruitment agencies.

Notwithstanding this, BITRIAL Kft. is committed to the lawful processing of personal data and informs data subjects that it will continue to process their personal data during the selection process and for one year thereafter for recruitment purposes, unless the controller orders otherwise at the request of the data subject.

BITRIAL Kft. stores and processes the CVs and/or application documents received by it.

BITRIAL Kft., as the employer and data processor, hereby informs the data subjects as set out below:

The purpose of data processing: applications for job openings at to BITRIAL Kft. and to participate in the selection procedure.

The legal basis for processing: the data subject's voluntary consent made at the controller.

The type of personal data processed: name, permanent address, residence, telephone number, e-mail address, place of birth, date of birth, as well as uploaded or sent photographs, cover letters, CVs, applications, and other personal data provided in them.

Time limit for the erasure of data: a maximum of **two years** from the date of submission of the application to the controller.

Possible consequences of not reporting data: the data subject is not able to register with BITRIAL Kft. for the published job vacancies.

6.4.3 Data processing by BITRIAL Kft. project organisations

BITRIAL Kft., as the data controller and as the creator of the project organisation, processes and protects the personal data of all internal data subjects (employees) and external data subjects (employees of contracted partners) in accordance with the requirements of the GDPR. The sole purpose of data processing is to ensure communication between the parties concerned, which is essential for the operation of the project, and to carry out the tasks for which the project was set up. The retention period for data processing is always determined by the legal obligations (Data Protection Act, Accounting Act) and the operational period of the project.

During the project, BITRIAL Kft. will process personal data only for the purpose of carrying out the tasks of the project, and will share them with third parties only to the extent necessary for the performance of the project.

BITRIAL Kft., as data processor, hereby informs the data subjects as set out below:

The controller of the personal data: BITRIAL KFT.

The purpose of data processing: contact and communication in relation to the business process by email, internal IT systems, telephone calls, and face-to-face meetings.

The legal basis for data processing: As the precondition for participation in the project is that the project participants have a contract with the data controller BITRIAL Kft, the legal basis for data processing is based on a contract, and for the purposes of evidence, the data controller fulfils its legal obligation when the jurisdiction requests proof of the operation of projects.

The type of personal data processed: The names, telephone numbers, email addresses, date, values and other time data pertaining to Project Members, as well as other data and information entered in the project tracking system.

The duration of data processing: 10 years.

Data Processors:

| Name | Registered seat | Data processing task |
|----------------------|--|--|
| BITRIAL Kft. | 1121 Budapest, Tállya utca 23. | The data controller providing the electronic mail system, the project location, and the project tracking system |
| Microsoft Office 365 | Microsoft Magyarország Kft., 1031 Budapest, Graphisoft Park 3. (Záhony u.) | providing a mail service and storing electronic mail and documents |
| INFOSECTOR Kft. | 2013 Pomáz, Kond utca 14. | Ensuring 24/7 and night-time operation of electronic mail systems, operating a secure mail filtering system, ensuring the operation of a project tracking system |

6.5 OTHER DATA PROCESSING

6.5.1 PROCESSING AND TRANSFER BASED ON A LEGAL OBLIGATION

We will provide information on any types of data processing not listed in this Policy. We hereby inform clients that courts, prosecutors, investigating authorities, authorities dealing with administrative offences, administrative authorities, the Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information], and, based on the power provided by law, other bodies may contact the controller for the purposes of receiving information, the disclosure or transfer of data, and making documents available.

If the authority has indicated the exact purpose and the sphere of data, **BITRIAL Kft.** shall disclose only the amount and scope of personal data to the authority that is essential for realizing the purpose of the contact.

BITRIAL Kft., as a contracting partner processes and/or transfers the data of its contracting partners and its own employees to third parties on the **basis of** European Union Working Party 29 (EU Central Data Protection Authority) **position paper wp249_hu (Data Processing at Work) and Information NAIH/2018/2570/2/V.**

This is done to ensure the primary purpose of **BITRIAL Kft.** and its contracted partners, namely the successful operation of business processes, by providing the personal data necessary to maintain human contacts and to identify business contacts.

This activity of the employer must be aimed solely at the performance of its duties, and therefore the transfer of personal data must also be for the sole purpose of maintaining contact and ensuring the business process. Personal data obtained and/or transferred in this way will not be used by **BITRIAL Kft.** and its contracted partner for any other purpose. This activity of the employer must be aimed solely at the performance of its duties, and therefore the transfer of personal data must also be for the sole purpose of maintaining contact and ensuring the business process. Personal data obtained and/or transferred in this way will not be used by **BITRIAL Kft.** and its contracted partner for any other purpose.

The controller of the personal data: BITRIAL Kft.

The purpose of data processing: to operate the business processes of **BITRIAL Kft.**, to provide contractual and quality service to partners.

The legal basis for processing: ensuring the legitimate interest of the employer (Article 6(1)(f) GDPR).

The type of personal data processed:

- employee name;
- employee's company e-mail address;
- employee's work telephone number;
- the employee's identity card number and/or other special unique identifier, if necessary for identification.

The duration of data processing: until the task is completed and/or throughout the business process;

Data processor: employees of the contracting parties.

Other data controllers: BITRIAL Kft. and its contracted partners are joint data controllers.

6.5.2 INCIDENT MANAGEMENT BY BITRIAL Kft.

Under **CHAPTER I Article 33 and (85) of the GDPR**, in the case of a personal data breach, BITRIAL Kft., as the controller, shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

As controller, BITRIAL Kft. has conducted an independent IT and data security audit of its IT systems and personal data management processes and considers the following security incidents to be a data breach:

- In relation to personal data processed in the systems referred to in point 5, upon the occurrence of the event(s) referred to in Article 4(12) (loss of confidentiality for any reason and in any way);
- In relation to the personal data processed and/or collected on the www.bitrial.hu website, upon the occurrence of the event(s) referred to in Article 4(12) (loss of confidentiality for any reason).

7 DOCUMENT DATA

This document is the document registered and issued for the EXTERNAL data processing of BITRIAL Kft..

Version number: 2.0
Responsible for document: Dr Gabriella Bíró - CFO, DPO
Prepared by: Csaba Gábor Váraljai – ISO 27001 LA, ISO ISA, DPO, EIFB
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8 VERSION CONTROL

| Version | Date | Short description of modification | Modified by |
|---------|-------------|-----------------------------------|---|
| 1.0 | 23 May 2018 | First version | Dr Gabriella Bíró DPO |
| 2.0 | 25.03.2024 | annual review | Csaba Gábor Váraljai ISO 27001 LA, ISO ISA, DPO, EIFB |
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