

PRIVACY NOTICE FOR CLIENTS

The date of entry into force of this Privacy Notice: 02.11.2021

Controller's name: **KELER CCP Central Counterparty Ltd.** (hereinafter: "**Controller**").

Detailed information relating to the Controller

Company (institution) name: KELER CCP Central Counterparty Ltd.

Registered office: H-1074 Budapest, Rákóczi út 70-72.

Email: kelerkszf@kelerccp.hu

Website: <https://www.kelerkszf.hu>

Name and email address of the Data Protection Officer:

dr. Tamás Leskó, adatvedelmitisztviselo@keler.hu

Regarding the processing of your personal data the Controller hereby informs you (hereinafter: "**You**" or "**Data Subject**") of the principles and practices applied by it during the processing of such personal data and of your rights related to processing and the method of and opportunities for exercising such rights.

The Controller pays particular attention to the fact that the personal data obtained by it during its operation and thereafter processed by it are processed and stored in accordance with the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: "**Regulation**").

Important information: You may ask for detailed information at any time on the processing of your data and may object to such processing. Additional information on such rights is available below.

We process your data (e.g. name, email address, phone number and less frequently some other data) during the establishment and term of our legal relationship with your employer or client, and to a limited extent also after the termination thereof. Detailed information on such processing is available in Annex 1.

1 YOUR RIGHTS AND AVAILABLE LEGAL REMEDIES

In relation to the above processing activities You as a data subject are entitled to the following rights and may enforce such rights as follows:

You are entitled, at any time, to request information regarding the data relating to You and processed by the Controller, to request the rectification, erasure and blocking of your data recorded and have the incomplete data completed, to exercise the right to data portability and of access to your personal data and to object to the processing of your personal data.

You may submit your request for exercising the rights specified in the previous paragraph primarily to the Data Protection Officer.

1.1. INFORMATION AND ACCESS TO PERSONAL DATA

Via the contact details set out in the above section, You may request the following information in writing from the Controller as to the processing performed by it:

- what personal data are processed,
- the legal basis for processing,
- the purpose of processing,
- the source of data,
- the duration of processing,
- to whom, when, based on what law, to which personal data the Controller provided access or to whom it transferred the personal data.

The Controller makes the data available to You in a commonly used electronic format unless You request the data in writing in a printed form. The Controller will not provide verbal information either via phone or in person.

The Controller provides you with the copy of personal data (in person at the Customer Service) free of charge for the first time. For additional copies requested by You, the Controller may charge a reasonable fee based on administrative costs. If You request the copy in electronic format, the Controller will provide You with the information via email in a commonly used electronic format unless otherwise requested by You.

If, after being informed, You do not agree with the processing and the accuracy of the data processed, as per those set out in this Section 1 You are entitled to request the rectification, completion or erasure of the personal data relating to You, the restriction of processing thereof and to object to the processing of such personal data, or to initiate the proceedings set out in Section 1.10.

1.2. THE RIGHT TO RECTIFICATION OF THE PERSONAL DATA PROCESSED AND TO HAVE SUCH DATA COMPLETED

Upon your written request the Controller shall, without undue delay, rectify the inaccurate personal data indicated by You, and complete the incomplete data with the content indicated by You. The Controller shall communicate any rectification or completion of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform You about the data of those recipients if You request it in writing.

1.3. RIGHT TO RESTRICTION OF PROCESSING

By submitting a written request You shall have the right to obtain from the Controller restriction of processing if

- the accuracy of the personal data is contested by You, for a period enabling the Controller to verify the accuracy of the personal data,
- the processing is unlawful and You oppose the erasure of the personal data and request the restriction of their use instead,
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by You for the establishment, exercise or defence of legal claims,
- You object to processing pending the verification whether the legitimate interests of the Controller override your rights to protect your personal data.

Personal data subject to restriction shall, with the exception of storage, only be processed during such period with your 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. You will be informed by the Controller before the restriction of processing is lifted.

1.4. RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

You shall have the right to obtain from the Controller the erasure of personal data concerning You without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Controller;
- b) You withdraw consent on which the processing is based and where there is no other legal ground for the processing;
- c) You object, on grounds relating to your particular situation, to processing, and there are no overriding legitimate grounds for the processing;

- d) You object to processing of personal data concerning You for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing;
- e) the personal data have been unlawfully processed by the Controller;
- f) the personal data have been collected in relation to the offer of information society services directly to a child.

You shall not be entitled to exercise your right to erasure (“right to be forgotten”) to the extent that processing is necessary

- a) for exercising the right of freedom of expression and information;
- b) for reasons of public interest in the area of public health;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes insofar as the exercise of the right to erasure would render impossible or seriously impair the achievement of the objectives of that processing;
- d) for the establishment, exercise or defence of legal claims;
- e) for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

1.5. RIGHT TO DATA PORTABILITY

If processing is necessary for performing a contract, or is based on your freely given consent and is carried out by automated means, You shall be entitled to obtain the data provided by You to the Controller in a machine-readable format. You shall have the right to have the personal data transmitted to another controller, where technically feasible. This right shall only apply to personal data disclosed by You; no other data may be transmitted (e.g. statistics, etc.).

You are allowed to:

- receive the personal data concerning You and available in the Controller’s system in a structured, commonly used, machine-readable format,
- to transfer such data to another controller,
- to have the data transmitted directly to another controller, where technically feasible in the Controller’s system.

That right shall not apply to processing 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 Controller fulfils the request for data portability exclusively upon a written request submitted via email or by post. In order to fulfil the request, it is necessary for the Controller to confirm that actually the person entitled to the right wishes to exercise such right. Within the framework of your right to data portability, You may request portability in relation to the data

You provided to the Controller. Exercising the right shall not automatically result in the erasure of the data from the Controller's systems; therefore, You will continue to be registered in the Controller's system even after exercising such right, unless You request the erasure of your data.

1.6. OBJECTION TO THE PROCESSING OF PERSONAL DATA

On grounds relating to your particular situation, You may object to the processing of your personal data by way of a declaration submitted to the Controller if the legal basis for processing is

- public interest as per point (e) of Article (6)1 of the Regulation, or
- legitimate interest as per point (f) of Article (6)1 of the Regulation.

Where personal data are processed for direct marketing purposes, You shall have the right to object at any time to processing of personal data concerning You for such marketing, which includes profiling to the extent that it is related to such direct marketing. In such cases the personal data shall no longer be processed for such purposes.

If the right to object is exercised, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In relation to establishing whether processing is justified by compelling legitimate grounds, the Controller shall make a decision. It shall inform you of its viewpoint in relation thereto in a written opinion.

You shall be entitled to object to processing in writing (via email or by post).

1.7. THE ENFORCEMENT OF RIGHTS OF A DECEASED DATA SUBJECT BY ANOTHER PERSON

Within five years following the death of the data subject, the person authorised by the deceased person to act or by means of a declaration recorded in an authentic instrument or a private document of full probative value shall be entitled to enforce the rights the deceased person was entitled to enjoy during his or her lifetime, such as the right of access, the right to rectification, erasure, restriction of processing, data portability and to object. If the deceased person made several declarations at the Controller, the person indicated in the declaration made at the later date may enforce such rights.

If the deceased person failed to make such a declaration, the rights the deceased person was entitled to enjoy during his or her lifetime and specified in the previous paragraph may be enforced by the data subject's close relative as per the Civil Code of Hungary within five years

following the death of the data subject (if there are several close relatives, the close relative first exercising that right shall be entitled to enforce such rights).

According to point (1) of Section 8:1(1) of the Civil Code of Hungary, the close relative shall mean spouses, direct ascendants, adopted children, stepchildren and foster children, adoptive parents, stepparents, foster parents, brothers and sisters. The close relative of the deceased person shall certify the following:

- the fact and date of the death of the deceased data subject with a death certificate or a court decision, and
- his or her own identity – and if necessary, his or her close relative capacity – with an authentic instrument.

During the enforcement of the rights, in particular during proceedings vis-à-vis the Controller or before the National Authority for Data Protection and Freedom of Information and the court, the person enforcing the deceased person's rights shall have the rights and obligations the deceased person was entitled to and subject to during his or her lifetime pursuant to the Act on Informational Self-Determination and Freedom of Information and the Regulation.

Upon written request, the Controller shall inform the close relative of the measures taken, unless explicitly prohibited by the deceased person in his or her declaration.

1.8. DEADLINE FOR FULFILLING THE REQUEST

The Controller shall provide information on action taken to You without undue delay and in any event within one month of receipt of the request as per Sections 2.1-2.6. That period may be extended by two further months where necessary, taking into account the complexity and the number of the requests, but in such a case, the Controller shall inform You of any such extension within one month following the receipt of the request, together with the reasons for the delay, and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Where requests from You are manifestly unfounded or excessive, in particular because of their repetitive character, for the fulfilment of the request 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 your request. The Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where You make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by You.

1.9. COMPENSATION AND TORT

Any person who has suffered material or non-material damage as a result of an infringement of the Regulation shall have the right to receive compensation from the Controller and/or processor for the damage suffered. The processor shall be liable for the damage caused by processing only where it has not complied with obligations of the Regulation specifically directed to processors or where it has acted outside or contrary to lawful instructions of the Controller. The 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.

1.10. POSSIBILITIES TO ENFORCE RIGHTS

You may exercise your rights in a written request sent via email or by post.

You cannot enforce your rights if the Controller demonstrates that it is not in a position to identify You. Where requests from You are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may charge a reasonable fee for the fulfilment of the request or refuse to act on the request. The Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request. Where the Controller has doubts concerning the identity of the natural person making the request, the Controller may request the provision of additional information necessary to confirm the identity of the person making the request.

Based on the Act on Informational Self-Determination and Freedom of Information, the Regulation and the Civil Code of Hungary (Act V of 2013), You

- a) may lodge a complaint with or submit a request to the National Authority for Data Protection and Freedom of Information (H-1055 Budapest, Falk Miksa utca 9-11; <https://www.naih.hu>),
OR
- b) may enforce your rights before the court. An action may be brought, at your choice, before the regional court based on your place of residence (the list and contact details of regional courts are available via the following link: <https://birosag.hu/torvenyszekek>).

2 MANAGEMENT OF PERSONAL DATA BREACHES

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. The Controller shall keep a record for the purpose of checking the measures related to personal data breaches, providing information to the supervisory

authority and You; the record shall include the personal data concerned, the data subjects and their number, the date and time, the circumstances and the effects of the breach as well as the measures taken to eliminate such breach.

In the case of a personal data breach, the Controller shall, without undue delay but not later than 72 hours, notify the personal data breach to the supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. When the personal data breach is likely to result in a high risk to your rights and freedoms, the Controller shall communicate the personal data breach to You without undue delay.

3 ACCESS TO DATA AND DATA SECURITY MEASURES, DATA TRANSFER

3.1. ACCESS TO DATA, DATA TRANSFER

The personal data are accessible to a strictly limited number of the Controller's employees and particular agents for the purpose of performing their tasks.

The Controller shall only provide the personal data processed by it to other bodies and public bodies in ways and for the purposes specified by law.

The Controller informs You that the court, the prosecutor, the investigation authority, the authority dealing with administrative offences, the administrative authority, the National Authority for Data Protection and Freedom of Information, or in accordance with statutory authorisation, other bodies may request the Controller to provide information, disclose or hand over data, or make documents available.

The Controller shall disclose personal data to the authorities, if the authority indicated the exact purpose and the set of data, in the quantity and to the extent absolutely essential to achieve the purpose of the request.

3.2. DATA SECURITY MEASURES

The Controller shall take every reasonable measure to ensure data security and provide an appropriate level of protection in particular against unauthorised access, alteration, transfer, disclosure, erasure or destruction as well as accidental destruction and corruption. The Controller shall ensure data security by applying appropriate technical and organisational measures.

The Controller shall choose and operate the IT devices applied for the processing of personal data during the provision of the service in a manner that:

- the processed data are available to the authorised persons (availability);
- the authenticity and authentication of the processed data are ensured (authenticity of processing);
- the unaltered state of the processed data is verifiable (data integrity);
- the processed data are protected against unauthorised access (data confidentiality).

During processing the Controller shall maintain

- confidentiality: it shall protect the information so that only the authorised persons may have access thereto;
- integrity: it shall protect the accuracy and completeness of the information and the processing method;
- availability: it shall ensure that when it is necessary for the authorised user, the desired information is actually accessible and the related tools are available.

In order to ensure compliance with the above requirements, the Controller shall, from time to time, make backups of the data available in its system, including your personal data. The legal basis for this processing activity is the Controller's legitimate interest, i.e. data recovery in the case of any data loss. Additional details are available in the Controller's Regulation on backup. Further information may be requested via the adatvedelmitisztviselo@keler.hu email address.

The protection of personal data is further ensured by the fact that the Controller engages a data protection officer who is accountable to the Controller's senior management and shall not act under the instruction of any person when performing his or her tasks.

Where processing is to be carried out on behalf of the Controller, the Controller shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the requirements of the Regulation will be met and the protection of your rights will be ensured.

4 MISCELLANEOUS PROVISIONS

The Controller reserves the right to unilaterally modify this Privacy Notice. If any change is made regarding the content of the Privacy Notice, the Controller shall notify You thereof by disclosing the modification on the Controller's website and indicating the date of entry into force of the new Privacy Notice.

If you provided the data of another natural person or fictitious data to the Controller and caused any damage thereby, the Controller shall be entitled to enforce its claim for compensation against You.

The Controller does not check the personal data provided to it. Exclusively the person providing the data shall be responsible for the accuracy thereof. Upon the provision of your personal data,

You assume responsibility for the fact that the provided data are true and that those are your own personal data.

Annex 1

DATA PROCESSING SITUATIONS

1. PROCESSING OF PERSONAL DATA RELATED TO THE TSY DECLARATIONS

Processed data: last and first name, mother's name, address, phone number, fax number, email address, password.

The purpose of processing: concluding business transactions with the Controller's Treasury unit.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): keeping an accurate record of the persons entitled to representation and organisational interest in ensuring the conditions to conclude the contract.

Duration of processing: five years following the termination of the legal relationship with the client, on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged. Consequence: no transaction will be concluded.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the co-worker of the Data Subject may provide data.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – also with regard to its scope of activities – in keeping an accurate record of the

persons entitled to representation and ensuring the conditions to conclude the contracts. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

2. CERTIFICATE MANAGEMENT, PROCESSING RELATED TO CLIENT INFORMATION

Processed data: name, username, email address, phone number.

The purpose of processing: the security certificate necessary to access the systems is sent to the contact person indicated in the contract using dual-channel encryption as an encrypted and compressed file to the email address of the contact person specified in the contract, while the sequence of characters necessary to unpack the zip file is sent to the mobile phone number of the contact person indicated in the contract. The contact person is informed of adding new users and the Client information on the system via the email address specified in the contract.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): organisational interest in the processing of personal data of the contact persons and the persons entitled to representation, with regard to the establishment and maintenance of the business relationship.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, You are obliged to provide such data to be able to use the systems. Consequence of failing to provide data: You cannot use the system.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

3. PROCESSING RELATED TO CUSTOMER DUE DILIGENCE

Processed data: Client's representative authorised to sign on behalf of the company, representative authorised to act and agent: last and first name, last and first name at birth, place and date of birth, residential address, if no such address exists, the place of abode, citizenship, identity card, driving licence, passport, address card (without the side certifying personal identification number), official document certifying the personal identification number, other identification document number, mother's name at birth.

Client's beneficial owner: last and first name, last and first name at birth, residential address, if no such address exists, the place of abode, citizenship, place and date of birth, PEP status, nature and degree of the ownership interest, data relating to the verification of the source of cash and the proper nature of transaction orders.

The purpose of processing: ensuring prudent operation and legal compliance (Act on Money Laundering and related laws), performing complete customer due diligence, fulfilling the reporting obligation, assessing client risks.

Legal basis for processing: legal obligation, point (c) of Article (6)1 of the Regulation. Act on Money Laundering.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): -

Duration of processing: ten years following the termination of the legal relationship (contract) on which processing is based (concerning legal relationships subject to the CSDR), eight years (concerning legal relationships subject to the Act on Money Laundering).

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged. Consequence of the failure to provide data: refusal of establishing a business relationship, suspension of the right of disposal over the account or termination of the contract by the Controller.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the forms containing personal data are signed by the client's representative(s) authorised to sign on behalf of the company; public register, company information database, OPTEN.

Recipients, categories of recipients if there is data transfer: in the case of suspected money laundering, the Financial Intelligence Unit of the National Tax and Customs Administration (NAV

PEI; authority) or any other service provider concerned regarding the performance of the suspicious transaction and maintaining a correspondent account for KELER CCP, moreover, in the case of client's consent recorded in an authentic instrument or a private document of full probative value, the customer due diligence data may be disclosed to other service providers in accordance with Sections 22-24 of the Act on Money Laundering.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

4. PROCESSING RELATED TO THE DATA OF CLIENTS' CONTACT PERSONS

Processed data: data of the clients' contact persons: last and first name, phone number, mobile phone number, email address.

The purpose of processing: keeping contact, ensuring continuous business contact.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): interest in keeping continuous contact.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of the failure to provide data: your employer/client may assign another contact person.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): possibly your employer/client.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping continuous contact with regard to contractual relationships. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

5. PROCESSING RELATED TO THE DATA OF THE CONTACT PERSONS ASSOCIATED WITH THE CLIENTS’ EMAIL ADDRESS USED FOR INVOICING

Processed data: data of the contact persons associated with the clients’ email address used for invoicing: last and first name, phone number, mobile phone number, email address.

The purpose of processing: keeping contact, ensuring continuous business contact (invoicing).

Legal basis for processing: the Controller’s legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): interest in using e-invoices, keeping contact.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequence of the failure to provide data: the client will receive a paper-based invoice.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): possibly your employer/client.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in using e-invoices, and in doing so, keeping contact with its business partners. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

6. PROCESSING RELATED TO THE DATA OF CONTACT PERSONS OF CLIENTS, STORED ATYPICALLY

Processed data: data of the clients’ contact persons: last and first name, phone number, mobile phone number, email address.

The purpose of processing: keeping contact, ensuring continuous business contact.

Legal basis for processing: the Controller’s legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): keeping general contact.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): possibly your employer/client.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping general contact with regard to contractual relationships. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

7. PROCESSING, FOR KELER CCP, RELATED TO MONEY LAUNDERING (EXCEL FILES)

Processed data: the data of the clients' representatives, persons having the right of disposal over the account and beneficial owners: specimen signature, last and first name, name, name at birth, place and date of birth, mother's name, address, citizenship, number and date of validity of the identity card, number and date of validity of the address card.

The purpose of processing: client identification.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): obtaining background information regarding the client and ensuring compliance with the laws on anti-money laundering.

Duration of processing: ten years following the termination of the business relationship and/or the performance of the transaction order.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, You are obliged to provide the data based on the law. Consequence of the failure to provide data: no business relationship will be established, the Controller may suspend the performance of already existing contracts.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): possibly your employer/client or the employees of your company.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in ensuring that background information on the client is obtained and ensuring compliance with laws on anti-money laundering. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

8. PROCESSING RELATED TO THE DATA OF USERS AND CONTACT PERSONS IN THE WARP SYSTEM

Processed data: data of the users and contact persons in the WARP system: last and first name, username, phone number, mobile phone number, email address.

The purpose of processing: keeping contact, ensuring continuous business contact (setting user rights for WARP system users).

Legal basis for processing: the Controller’s legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): keeping a record of investment unit distributors and interest in the establishment of the settlement system.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data; consequence of the failure to provide data: your user rights are not generated.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): possibly your employer/client.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping a record of the investment unit distributors and in the establishment of the settlement system. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

9. PROCESSING RELATED TO THE ORGANISATION OF NSG SESSIONS

Processed data: list of NSG members: name, email address and phone number of the members, company name, address of place of work.

The purpose of processing: keeping contact with the members, ensuring business contact.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): legitimate interest in the management of NSG membership.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: -

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): possibly a source available on the website, a contact person specified by a co-worker.

Recipients, categories of recipients if there is data transfer: Gábor Sin – Central Bank of Hungary (MNB).

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in managing and performing the administration of NSG membership. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

10. PROCESSING RELATED TO THE ORGANISATION OF USER COMMITTEE SESSIONS

Processed data: list of User Committee members: name, email address and phone number of the members, company name, address of place of work.

The purpose of processing: keeping contact with the members, ensuring business contact.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): legitimate interest in the management of User Committee membership.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

11. PROCESSING RELATED TO THE AVAILABILITY OF CLIENT CONTACT DETAILS NECESSARY FOR CLIENT COMMUNICATION

Processed data: list of contact persons: contact persons' last and first name, email address, phone number, company name, address of place of work.

The purpose of processing: keeping contact, ensuring continuous business contact.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): interest in keeping general contact, ensuring business contact.

Duration of processing: five years following the termination of the legal relationship on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: he or she is not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): a source available on the website, a contact person specified by a co-worker.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in ensuring continuous contact, and within the framework thereof, in processing the data of contact persons. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

12. PROCESSING RELATED TO PARKING TICKETS

Processed data: parking ticket numbers of suppliers, visitors and clients, date and time of arrival and leaving, name of the host person.

The purpose of processing: checking the items invoiced by R70 operator.

Legal basis for processing: the Data Subject's consent, point (a) of Article 6(1) of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): -

Duration of processing: until 31 May of the sixth year following the issue of the parking ticket.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data. Consequences of the failure to provide the data: the parking costs will not be reimbursed.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: FAKULTÁS FM Zrt. (registered office: H-5093 Vezsény, Templom utca 1.; Company registration number: 16-10-001836) security company.

13. PROCESSING RELATED TO THE INSPECTION AND STORAGE OF PERSONAL DATA INCLUDED IN THE CONTRACT PORTFOLIO

Processed data: name, phone number, email address, position.

The purpose of processing: concluding and amending contracts, looking up conditions.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): performance and conclusion of contracts as well as the administration thereof.

Duration of processing: the termination of the contract with the partner + five years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): in many cases the text of the contract includes these data which have been mostly provided by You.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in the performance and conclusion of contracts as well as the administration thereof.

Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

14. PROCESSING RELATED TO LEGAL DISPUTES, OUT-OF-COURT PROCEEDINGS AND PROCEEDINGS CONDUCTED BY AUTHORITIES (NATIONAL TAX AND CUSTOMS ADMINISTRATION (NAV), STATE AUDIT OFFICE (ÁSZ), CENTRAL BANK OF HUNGARY (MNB)), ADMINISTRATION AT THE COURT OF REGISTRY

Processed data: personal data of witnesses and other data thereof indicated in documents related to the legal dispute.

The purpose of processing: providing effective representation in legal disputes and proceedings conducted by authorities.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): being effective in taking action in legal disputes and successful enforcement of claims.

Duration of processing: termination of the legal dispute or the enforcement period + five years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the other party, the authority, the court.

Recipients, categories of recipients if there is data transfer: the court, the authority, the other party to the legal dispute.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: attorneys-at-law.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in being effective in taking action in legal disputes and proceedings by authorities as well as in successful enforcement of claims. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data

Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

15. PROCESSING RELATED TO THE SENDING OF NOTIFICATIONS OF CLIENT SATISFACTION SURVEYS

Processed data: list of contact persons: contact persons' last and first name, email address, phone number, company name, address of place of work.

The purpose of processing: keeping contact, ensuring continuous business contact.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): organisational interest in improving the service quality.

Duration of processing: five years following the return of the survey.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide data.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): a source available on the website, a contact person specified by a co-worker.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: partner company engaged in market research.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in improving the quality of its services, and

to this end, in collecting client feedback. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

16. PROCESSING RELATED TO GMRA CONTRACTS IN TERMS OF AUDIO RECORDING

Processed data: in the case of BCP events, it is exceptionally performed using audio recording phones; the recording is retained by IT/BIM.

The purpose of processing: checking the handling of complaints and traceability of complaints, proving legal declarations.

Legal basis for processing: the Controller's legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): organisational interest in proving the legal declaration made by the officer of the client authorised to representation.

Duration of processing: five years following the recording.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged. Consequence: no transaction will be made.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no obligation to provide data exists.

Recipients, categories of recipients if there is data transfer: authority, court.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:
The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in proving the legal declaration made by the client’s officer entitled to representation. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

17. PROCESSING RELATED TO THE OUTLOOK ADDRESS BOOK

Processed data: name, position, mobile phone number, email address.

The purpose of processing: keeping contact.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): interest in keeping contact.

Duration of processing: five years following the termination of the legal relationship with the client on which processing is based.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: although contractual business partners provide each other with the data of their contact persons, You are not obliged to provide such data; in such a case, the Controller cannot keep contact with You without difficulties.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): your employer or client may disclose such data to the Controller.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: based on USA-BCR.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in keeping contact. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

18. PROCESSING RELATED TO CONFLICT OF INTEREST RULES

Processed data: I. Employee if having a securities account: the name of the investment firm or the credit institution, the identifier of securities account(s), the identifier of client accounts, date of opening the account, if having ownership or executive officer status, employment or other legal relationship in a company: the name and company registration number of the company, extent of shareholding interest, personal interest.

II. Employee if having the qualified financial instrument defined in the Regulation on Conflict of Interest: name, identifier, date of acquisition and date of sale.

III. Employee if having ownership in an investment firm, credit institution, central securities depository and central counterparty: name, company registration number, ownership stake, date of acquisition and date of sale.

The purpose of processing: identifying and handling situations resulting in potential conflict of interest.

Legal basis for processing: legal obligation, point (c) of Article (6)1 of the Regulation. Article 50 of COMMISSION DELEGATED REGULATION (EU) 2017/392 of 11 November 2016 supplementing Regulation (EU) No 909/2014 of the European Parliament and of the Council with regard to regulatory technical standards on authorisation, supervisory and operational requirements for central securities depositories.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): -

Duration of processing: termination of the employment + ten years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: requesting and providing the data are statutory obligations, processing based on law.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): public register, company information database, OPTEN, securities and client account statements.

Recipients, categories of recipients if there is data transfer: MNB (supervisory authority).

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

19. PROCESSING RELATED TO THE ERROR REPORTING APPLICATION

Processed data: name, username, email address, phone number.

The purpose of processing: operation of the error reporting system, keeping contact with the person making the report.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): IT security and accountability interest in the identification of the users of the error reporting system.

Duration of processing: two years following data recording.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to provide your data. Consequence of the failure to provide data: error report will not be performed.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate (IT security and accountability) interest – *also with regard to its scope of activities* – in identifying the users of the error reporting system. Processing has a minor impact on the Data Subject’s privacy, which does not exceed the Data Subject’s reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

20. PROCESSING RELATED TO FATCA-CRS DECLARATIONS

Processed data: data of the controlling person (name, address, tax residence, USA tax number) as per the form of the National Tax and Customs Administration (NAV).

The purpose of processing: data reporting to NAV (compliance with OECD requirements), compliance with FATCA-CRS declarations.

Legal basis for processing: legal obligation, point (c) of Article (6)1 of the Regulation. Act XIV of 2014, Act CXC of 2015.

Description of the Controller’s legitimate interest (if the legal basis is legitimate interest): -

Duration of processing: the current year + ten years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are obliged to provide your data. Consequence of the failure to provide data: the legal relationship will not be established.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): provided by the company representative based on statutory obligation.

Recipients, categories of recipients if there is data transfer: NAV.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

21. PROCESSING RELATED TO THE JOINT TESTING OF IT SYSTEMS

Processed data: name, email addresses, passwords.

The purpose of processing: enabling the performance of tests together with the clients.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): organisational interest in proper administration of joint IT tests and providing access to the IT system.

Duration of processing: five years following data provision.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: You are not obliged to participate in the testing of IT systems. If You do not provide data, You cannot participate in the tests.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): no.

Recipients, categories of recipients if there is data transfer: none.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in proper administration of joint IT tests and providing access to the IT system. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.

22. PROCESSING RELATED TO DECLARATIONS OF CONFIDENTIALITY, DECLARATIONS OF ACKNOWLEDGEMENT /CONTRACTS/ AND CERTIFICATES OF PERFORMANCE

Processed data: as per the content of the document (typically name, company).

The purpose of processing: registering BIM-specific obligations.

Legal basis for processing: legitimate interest, point (f) of Article (6)1 of the Regulation.

Description of the Controller's legitimate interest (if the legal basis is legitimate interest): protection of payment, banking and securities secrets and protection of property.

Duration of processing: period of confidentiality specified in the declaration of confidentiality + five years.

Is the Data Subject obliged to provide the data? Is the provision of personal data a statutory or contractual requirement? What are the possible consequences of the failure to provide such data for You?: yes, he or she is obliged to provide data. Consequence of the failure to provide data: termination of the contract, refusing to provide the permanent entry permit.

Where data have not been obtained from the Data Subject, the source of personal data (are the data obtained from a publicly available source?): the representative of the contractual party.

Recipients, categories of recipients if there is data transfer: there is no data transfer to persons other than the contracting party.

Are the data transferred to countries outside the EU? If yes, the adequacy decision or any other appropriate and suitable safeguard shall be indicated: no.

Is automated decision-making applied?: no.

Processors: none.

Additional characteristics of processing:

The extract of balance of interest test:

During the balance of interest test it was established that the Controller has a legitimate interest – *also with regard to its scope of activities* – in protecting payment, banking and securities secrets and in protecting property. Processing has a minor impact on the Data Subject's privacy, which does not exceed the Data Subject's reasonable expectations. As processing is necessary for the purposes of the legitimate interests pursued by the Controller and such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, the data specified above may be processed by the Controller pursuant to point (f) of Article 6(1) of the GDPR.