

# BARRÉ TECHNOLOGIES ZRT.

## PRIVACY POLICY

As controller, **Barré Technologies Zrt.** respects the privacy of all persons who provide personal data to it and is committed to protecting them. The European Union General Data Protection Regulation (Regulation 679/2016, hereinafter "**GDPR**") **Article 13** provides the following information:

**Barré Technologies Zrt.** treats the personal data it collects confidentially, in line with data protection legislation and international recommendations, in accordance with this Privacy Policy (hereinafter referred to as the "**Policy**") and takes all security, technical and organisational measures to ensure the security of the data.

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

The purpose of this Policy is to provide to any person who comes into contact as a client with Barré Technologies Zrt. as controller I (hereinafter the "**Company**" or the "**Controller**") or as any other contracting or cooperating partner, as well as persons entering the Company's headquarters (hereinafter "**Customers**") and visitors to the website [www.barre.hu](http://www.barre.hu) operated by the Company (the "**Website**") (hereinafter collectively referred to as "**Data Subjects**") when using the products or services offered by the Controller (the "**Services**") detailed information on all relevant facts concerning the processing of their personal data, in particular the purpose and legal basis of the processing, the persons authorised to process the data, the duration of the processing and who may access the data in accordance with the provisions of the GDPR.

The Company provides information to the data subject on other processing of personal data in other notices, policies or at the time of data collection.

The current version of this Policy is available at all times on the **Company's Website**. The Data Subject acknowledges and accepts the following and consents to the processing of the data as set out below.

Company name:	<b>Barré Technologies Private Limited Company</b>
Registered office:	1063 Budapest, Szinyei Merse utca 10
Company registration number:	01-10-141069
Website:	<a href="https://www.barre.hu/">https://www.barre.hu/</a>
Representative:	Tamás Árpád Bartha CEO
Telephone:	+36 70 338 0791
E-mail:	<a href="mailto:info@barre.hu">info@barre.hu</a>
Data protection officer:	Kata Majer

## **1. Data subjects concerned, scope of the Policy:**

The scope of this Policy applies to anyone whose personal data are processed by the Company for business purposes or whose data are provided to the Company. By providing their personal data to the Company, the Data Subject accepts the terms of this Policy and consents to the processing of their data in accordance with this Policy.

The personal scope of this Policy extends to the Company as Controller, and to the persons whose data are included in the processing covered by this Policy and to the persons whose rights or legitimate interests are affected by the processing.

The Company processes primarily the data of natural persons who have contacted it for example by electronic means, by sending their data via e-mail to [info@barre.hu](mailto:info@barre.hu), through a social networking site or by telephone, or in person, for the purpose of establishing a customer relationship, requesting a quote, using or requesting the Company's services (mainly **IT services** - hereinafter the "**Service**") or contacted the Company for any reason or purpose other than establishing a customer relationship, or accessing the Company's headquarters. The Company also processes the data provided by its natural person Customers and by the representatives, contact persons of its non- natural person Customers or by other Customers.

In the case of personal data of Data Subjects where the Data Subject and the person providing the personal data relating to the Data Subject are not the same, the person providing the data is responsible for ensuring that they have the appropriate authorisation from the Data Subject in respect of the data provided and is obligated to inform the Data Subject of the provisions of this Policy.

The scope of this Policy covers all electronic and/or paper-based processing of personal data by the Company.

This Policy is effective from 01 November 2023 until further notice or until revoked. The Company has the right to amend this Policy unilaterally.

## **2. Definitions and Interpretation**

For the purposes of this Policy, each of the definitions set out below has the following meaning:

*"personal data"* means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; *"processing"* means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection,

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

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

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

"*recipient*" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

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

"*consent of the data subject*" means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

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

"*data concerning health*" means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

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

"*personal data breach*": a personal data breach means a breach of security relating to the processing of personal data that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Other terms defined in the GDPR are set out in Article 4 of the Regulation

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

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

- a.) Processing of the data of natural persons provided by the users of the Service or in the case of legal entity Customers, their employees or by the Customers, in connection with the performance of the Company's activities or the Service it provides, for the purposes of preparing, concluding and performing contracts, as well as for the performance of legal obligations and maintaining customer relations;

- b.) Processing of Data Subject's data in connection with the provision of the rights and performance of obligations arising from the contractual relationship (including the use of Services and the fulfilment of orders, as well as the processing of Customer contact details);
- c.) Marketing activity to potential Customers on the basis of their consent;
- d.) Processing of personal data of potential Customers for direct marketing purposes on the basis of the Company's legitimate interest;
- e.) Compliance with the legal obligations and enforcing the legitimate interests of the Data Subject and the Company;
- f.) The transfer of Data Subject's data to business partners, where this is unavoidable, in order to facilitate the provision of the Service to the Data Subject and with the Data Subject's prior consent;
- f.) After the termination of the contract with the Company, to exercise the rights and obligations arising from the contract or the provision of the Service, in particular to enforce claims based on the contract or arising from the provision of the Service;
- g.) To improve the quality of the Service, market research and survey of habits done to this end.

### **3.2. Legal grounds for data processing:**

- a.) The legal basis for the processing is primarily the prior, voluntary consent of the Data Subject, based on prior information provided by the Controller, and the general purpose of the processing is to ensure the supply of the Service and to maintain contact. In addition, the Company processes the data to provide the Service, to comply with a legal obligation to which it is subject, or to protect the legal interests of the parties.
- b.) If the Data Subject has provided the data voluntarily, the Company processes the personal data with the Data Subject's consent. Voluntary consent on the part of the Data Subject is understood to include the behaviour whereby the Data Subject, by using the Website, accepts that all regulations relating to the use of the Website, including this Policy, automatically apply to them.
- c.) The Data Subject has the right to withdraw his or her consent at any time, however, under the GDPR, if the personal data have been collected with the consent of the Data Subject, unless otherwise provided by law, the Company may process the data collected for the purposes of complying with a legal obligation to which it is subject or for the purposes of pursuing its own or a third party's legitimate interests, where such interests are proportionate to the restriction of the right to the protection of personal data, without any further specific consent, even after the Data Subject's consent has been withdrawn. The withdrawal of consent does not affect the lawfulness of the processing prior to its withdrawal. In cases prescribed by law, data processing is mandatory.
- d.) in the case of personal data of Data Subjects where the Data Subject and the person providing the personal data relating to the Data Subject are not the same, the person providing the data is responsible for ensuring that they have the appropriate authorisation from the Data Subject in respect of the data provided and such person is obligated to inform the Data Subject of the provisions of this Policy.

- e.) In the case of Services provided by the Company electronically to remote users, to which the recipient of the Service as the Data Subject has individual access, the Company processes the personal data relating to the Data Subject as the recipient of the Service for the purposes of concluding the contract for the provision of the Service, proving the conclusion of the contract, invoicing the fees arising from the Service and enforcing any claims related thereto.
- g.) The Company also draws attention to the fact that in certain cases the possible consequences of failure to provide data may be increased difficulties in maintaining business contacts during the period of the Service, or the performance of the Service itself, or the use of the Services supplied by the Company may be subject to the Data Subject providing the data required in the course of certain processing activities.

### **3.3. Scope, limits and principles of Processing**

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

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

### **3.4. Source of the data:**

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

### **3.5. Duration of the processing:**

The duration of processing is as set out below, provided, however that each processing purpose may specify a different duration of processing and thus the processing periods detailed in each processing purpose prevail.

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

In the case of mandatory processing based on law, the relevant statutory provision determines the duration of the processing. Invoices issued must be kept for 8 years, as provided in the Act on the Rules of Taxation and the Act on Accounting.

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

**4. Description of each type of processing:**

**4.1. A Wwebsite visitor data processing**

When you access the Website, the server serving the Website may technically automatically record certain data generated during the visit. The data that are automatically recorded are automatically logged by the system at the time of entry or exit, without any special declaration or action by the Data Subject visiting the Website (hereinafter the **(User”)**). The system processes this data for the shortest period of time necessary for the provision of the Service and for the security of its operation - typically less than 1 day - after which the data are overwritten, i.e. deleted. Thus, for example, the following data may be stored: IP address, browser data, visit parameters.

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

Legal basis of data processing: the Data Subject's voluntary consent

Scope of processed data:

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>session identifier</b>	<b>identification</b>

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

**4.2. Cookies**

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

A cookie is a packet of information, usually a small text file, containing a unique identifier and stored on the user's computer or mobile device. The cookie is placed on

the User's device by the visited Website itself for identification purposes, so that the User's device will be recognisable when visiting a particular Website.

Some of the cookies, which are not strictly necessary for functionality, are based on the User's consent (Article 6(1)(a) GDPR), while others (which are essential for the provision of the service) are based on the Data Controller's legitimate interest (Article 6(1)(f) GDPR).

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

### **Cookies strictly necessary for the functionality of the Website**

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

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

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

Purpose of the processing: identifying Users and tracking visitors.

Data Subjects concerned: visitors to the website

Duration of the processing: the duration of processing is until the end of the visit to the website in the case of session cookies, or 1 day, 1 year or 2 years in other cases. Data subjects have the possibility to delete cookies in the Tools/Settings menu of their browsers, usually under the Privacy settings.

### **Statistical cookies:**

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

Legal basis of the processing: the User's consent

### **Marketing cookies:**

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

Legal basis of the processing: the User's consent

### **Cookie settings in browsers**

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

### **Cookie settings on the Website**

After logging in to the Website, the Controller provides information about the Website cookie policy in a pop-up window, where the User is asked to give their consent to the cookie policy. The User can choose which types of cookies they agree to by ticking or unticking the box in front of the cookie type.

### **Links to other external addresses**

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

### **4.3. Contact, request for information, communication, product support**

Data Subjects can contact the Company via the Website or by sending an e-mail to the Company's e-mail address or by providing certain information to the Company. Prospective Customers of the Company may contact the Company's designated contact person directly.

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

Legal basis for processing: consent of the Data Subject (Article 6(1)(a) GDPR).

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>name</b>	identification
<b>company name</b>	identification
<b>phone number</b>	contact, communication
<b>e-mail address</b>	contact, communication
<b>message date</b>	identification
<b>subject and text of message</b>	response, providing information
<b>other personal data provided by the Data Subject</b>	response, providing information

Duration of processing: the period necessary for the purposes for which the data are processed, which in each case will not exceed 5 years from the date when the data are provided or the time limit for the enforcement of any right of recourse, but not longer



than the withdrawal of consent. If no contract or agreement is concluded between the Company and the Data Subject (or the company represented by the Data Subject) following the pre-contractual processing, the Company will delete the message(s) after the communication has been completed - provided that no other processing purpose is fulfilled.

**4.4. Processing related to the Service and customer relationship supplied by the Company**

**4.4.1. IT consulting service**

Use of the Service becomes possible after contacting the Company by providing additional data or ordering the IT consulting service.

Data Subjects concerned: natural persons establishing a business relationship or legal persons providing data relating to natural persons.

Purpose of the processing: the performance of the contract, service supply, the identification of Customers, the recording of the details of the services used in accordance with the Accounting Act, and maintaining contact,

The legal basis for processing: consent of the Data Subject (Article 6(1)(a) GDPR), the performance of a contract to which the Data Subject is a party or the performance of a legal obligation (Article 6(1)(c) GDPR).

Scope of data processed and purpose of the processing:

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>name</b>	identification
<b>billing address</b>	identification
<b>phone number</b>	keeping contact
<b>e-mail address</b>	identification, communication
<b>tax number</b>	identification
<b>other personal data provided by the Data Subject</b>	Data required to provide the Service
<b>ordered service</b>	necessary for performance
<b>mode of payment</b>	necessary for financial performance

The activity and process involved in the processing: Performance of Services ordered by Customers payment of the fee.

Duration of processing: the period necessary for the purpose of processing, which in some cases corresponds to the term of the contractual relationship or lasts until the expiry of the limitation period for the enforcement of rights and obligations arising from

the legal relationship which is the legal basis for the processing, with the exception of accounting records, where the mandatory retention period is 8 years.

**4.4.2. Processing of contact details**

The Company may process personal data in the course of its business activities, if such data is transferred to it by the Data Subject or the other contracting party (legal entity). The Company presumes that its Customers and Business Partners have appropriate authorisation or consent from the Data Subject in relation to data subjects’ data obtained from natural persons that they provide to the Company.

Data Subjects concerned: natural persons establishing a business relationship or legal persons providing data relating to natural persons, and persons acting on behalf of such legal persons.

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

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

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>name</b>	identification
<b>e-mail address</b>	keeping contact
<b>phone number</b>	keeping contact

Legal basis of the processing: The Controller processes the data of the Data Subjects for the purpose of keeping contact with the Customer. The legal basis for the processing is the legitimate interest of the Controller (Article 6(1)(f) GDPR).

Period of the processing: Duration of processing: the period necessary for the purpose of processing, which may correspond to the existence of the contractual relationship, but is not longer than the period until the withdrawal of consent or the period for the enforcement of any claim (5 years from the performance of the contract (limitation period)) and the period specified in accounting legislation (8 years from the date of the provision of personal data by the data subject to the preparation of the annual accounts, annual report or accounting statements for the financial year in question).

**4.4.3. Data processing activities performed by the Company**

In certain cases the Company is deemed as a Data Processor in connection with the Service provided to its Customers, in respect of the data supplied to it by its Customers as Controllers.

The Company undertakes or provides appropriate safeguards to ensure that its processing activities as Processor comply with the requirements of the GDPR and that appropriate technical and organisational measures are implemented to ensure the protection of the rights of Data Subjects. These include:

- The Company processes the data on the instructions of the Controller, in accordance with the data protection rules and principles and shall take into account the contractual obligations of the Controller known to the Processor.
- The Company will not modify, delete, copy, link to other databases, use for any purpose other than the underlying contract or its own purposes, or disclose to third parties the data provided to by the Controller to the Company, except to the extent expressly required by the Controller and necessary for the purposes of the Processing.
- The Company is not entitled to represent the Controller or to make any statement on behalf of the Controller, unless expressly authorised to do so by an agreement with the Controller or other document.
- The Company sets forth that the Controller has the exclusive right to determine the purposes and means of the processing of the data provided to the Processor.
- The Company, as Processor, is required to ensure the security of the data, to take all technical and organisational measures necessary to enforce the data protection rules, and to take appropriate measures against unauthorised access to the data, unauthorised alteration, transmission, disclosure, deletion, destruction of the data. It is also required to take appropriate measures against accidental destruction or damage and against inaccessibility due to technical changes.
- The Company, as Processor, provides access to the data only to those of its employees who need it for the purposes of carrying out the processing activities, and informs those who have access of the security compliance and confidentiality obligations and ensure that they are bound by confidentiality obligations.
- The Company, as Processor, undertakes to cooperate with the Controller in order to enable the Controller to comply with its legal obligations. In particular, the cooperation covers the following areas: compliance with the requests related to the fulfilment of the Data Subjects' rights of access, erasure and rectification within the statutory time limits.
- The Company, as Processor, undertakes to modify, supplement, correct, block or delete the data processed by it in accordance with the instructions of the Controller.
- The Company shall promptly notify the Controller of any events or risks affecting the security of the data, take measures to address them and cooperate fully with the Controller.
- The Company undertakes to cooperate fully with the Controller in any audit or investigation of its systems, records, data, information and procedures relating to the processing of data.
- The Company deletes personal data whose storage and retention is not required by this Policy or by law after the provision of the Service underlying the processing has been completed.

The Company, as Processor is only liable for damages if it has not complied with the instructions of the Controller or the provisions of this Policy or the statutory provisions applicable to the Processor. **The maximum liability of the Company as Processor for direct and indirect damage caused by it to the Controller or third parties is limited to the amount of the contractor fees paid to the Processor in the year in which the damage occurred.**

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

**4.5. Data processing in connection with complaints**

The Company provides the opportunity for the Data Subject to communicate their complaint regarding the ordered or purchased product, the repair carried out and/or the Company's conduct, activity or omission orally (in person, by telephone) or in writing (e-mail, post).

Data Subjects concerned: any natural person who wishes to lodge a complaint regarding the product ordered, the service provided and/or the Company's activities.

The purpose of the processing of the data is to ensure the lodging of the complaint, to identify the Data Subject and the complaint, to record data resulting from legal obligations, keeping contact and to handle complaints.

Legal basis of the processing: The consent of the Data Subjects and the legitimate interest of the Data Subject (Article 6(1)(f) GDPR) and the performance of a legal obligation (Article 6(1)(c) GDPR).

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>name</b>	identification
<b>mailing address</b>	sending notices
<b>e-mail address</b>	sending notices
<b>phone number</b>	sending notices
<b>subject of complaint</b>	investigation of the complaint
<b>complaint identification number</b>	complaint registration

The Company will promptly investigate verbal complaints and remedy them as necessary. If the Customer does not agree with the handling of the complaint or if it is not possible to investigate the complaint immediately, a record of the complaint will be taken and a copy given to the Customer.

The record of the complaint must include the following:

- Customer name;
- the Customer's address, registered office and, where applicable, postal address;
- where, when and how the complaint was lodged;

- a detailed description of the Customer's complaint, with the objections raised in the complaint recorded separately, so as to ensure that all the objections contained in the Customer's complaint are fully investigated;
- a list of documents, records and other evidence produced by the Customer;
- the signatures of the person who took the record and the customer (the latter is required in the case of a verbal complaint made in person);
- the place and time when the record was taken.

Duration of the processing: The Company keeps the record of the complaint and a copy of the reply for five years pursuant to Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

#### **4.6. Marketing-related processing**

##### **a.) Data processing in connection with newsletter**

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

Legal basis for the processing: subscription to the newsletter is based on voluntary consent (Article 6(1)(a) GDPR). The Data Subject is not required to consent to the processing. If the Data Subject does not consent to the processing of the data, the following consequences apply: they will not receive the Company's newsletters, commercial and informative letters. In the case of unsolicited marketing enquiries, the processing of personal data for direct marketing purposes is deemed to be based on the Company's legitimate interest.

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

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

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>name</b>	identification
<b>e-mail address</b>	sending of newsletter
<b>registration date</b>	identification, technical operation
<b>phone number</b>	keeping contact

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

The Company uses the automated newsletter sending platform Mailerlite to send newsletters. In this capacity, Mailerlite (MailerLite, Inc., a Delaware corporation at 548 Market St, PMB 98174, San Francisco, CA 94104-5401, United States) is considered a platform processor, and its processing activities are related to the provision of technical support. Mailerlite has made a declaration of compliance with GDPR rules.

The Mailerlite Terms of Use and Mailerlite Privacy Policy are available at the following link: <https://www.mailerlite.com/legal/privacy-policy>)

#### **b.) Processing of data in connection with social media**

The Company is present on the LinkedIn social network site. The primary purpose of the content placed on these page is to present the Service, share, publish and market the content on the Website on social networking site. Through the social networking site, Data Subjects can find out about the latest products, the Service, and any promotions and news from the Company.

In the course of its activities, for the purpose of sharing or "liking" or promoting certain content elements, products, promotions or the social networking site itself, on the Facebook/Twitter/LinkedIn/Pinterest/Youtube/Instagram/TikTok etc. social networking sites linked to the **Barre Technologies Zrt. website**, the Company may process the names and public data of the Data Subjects registered on the social networking sites who "like" the Company's social networking site. The Company communicates with the Data Subjects through the social networking site only if the Data Subject contacts the Company via this forum, i.e. the social networking site.

Legal basis for the processing: contact, communication and other operations within and through the social networking sites with the Company are based on voluntary consent (Article 6(1)(a) GDPR). Based on the terms and conditions of the social networking site, the Data Subject voluntarily consents to follow and like the Company's content.

Data Subjects concerned: natural persons who follow, share or like the social networking sites of the Controller or their content.

<b>Scope of the processed data</b>	<b>Purpose of data processing</b>
<b>name</b>	identification
<b>public data</b>	identification
<b>message</b>	keeping contact
<b>e-mail address</b>	keeping contact

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

The Data Subject may obtain information on the data processing by that social networking site on the relevant site.

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

#### **4.7. Claims management**

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

The activity and process involved in the processing:

- The Company will contact the representative of the Customer with the debt by telephone and/or in writing, requesting payment;
- Claims and relevant related personal data will be made available to an external claims management company of its choice;
- in the course of official proceedings, or in the event of recourse to a non-litigious or litigation procedure, the data will be transmitted by the Company to the competent authorities or courts to the extent necessary.

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

Purpose of the processing: to identify Customers, keeping contact, taking measures to recover claims

The legal basis for the processing is the legitimate interest of the Company (Article 6(1)(f) GDPR).

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

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

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

#### **4.8. Use of an electronic surveillance system (camera)**

The Company uses a camera system at its headquarters to enforce property security and accident prevention requirements.

The legal background to the operation of the camera system:

- Act CXXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigation,
- Act CXII of 2011 on the Right of Informational Self-Determination and the Freedom of Information, and
- the GDPR.

The legal basis for the processing is the Data Subject's voluntary consent on the basis of the Operator's information in the form of signs and the camera policy available at the reception (Article 6(1)(a) GDPR). Consent may also be given in the form of implied conduct. In particular, the Data Subject's access to or presence in the units covered by the CCTV system are considered as implied conduct.

The rules for operating the camera system are set out in a separate notice and camera policy.

#### **4.9. Processing of Data Subject's data relating to job applicants**

With respect to job applications sent to the Company, the Company provides information on these data processing practices in its Privacy Policy for Job Applications, and contacting the Company is subject to reading and accepting the terms of this Policy.

### **5. Persons authorised to access data:**

Only employees of the Company who need to have access to the data to perform their job duties have the right to access the data. Persons who have access to personal data at the Company are under a duty of confidentiality with regard to the personal data of Data Subjects, i.e. they must treat personal data and other information that they become aware of in the course of their duties or otherwise as confidential and not disclose it to third parties.



## 6. Data security

The Company takes into account the requirement of data security in the design of its entire data protection process in accordance with the principle of *privacy-by-design*, i.e. data protection by default and by design. The Company aims to minimise the processing of personal data to reduce the risks of data processing.

The Company ensures that the data security rules provided for in the applicable legislation are applied. When determining and applying data security measures, the Company takes into account the state of the art of technology and shall choose among several possible processing solutions the one which best ensures a higher level of protection of personal data, unless this would involve a disproportionate effort. The Company also takes the technical and organisational measures and establishes the procedural rules necessary to enforce the applicable laws, data protection and confidentiality rules.

The Company takes appropriate measures to protect the data against unauthorised access, alteration, transfer, disclosure, erasure or destruction, accidental destruction or damage, and against inaccessibility resulting from changes in the technology used.

Data security responsibilities of the Controller

- implement technical and organisational measures to secure electronically stored data;
- ensure that the data security rules required by law are enforced;
- ensure that data protection and confidentiality rules are respected;
- prevent unauthorised access to data;
- take the necessary measures to prevent any damage to the data;
- promote data processing awareness among its employees to ensure data security;
- ensure the physical protection of data stored on paper;
- ensure the physical protection of the devices used for electronically stored data;
- ensure password protection of electronically stored data;
- ensure that data is backed up regularly;
- ensure that access to data is restricted to authorised persons.

The Company ensures the protection of the security of data processing by technical and organisational measures which provide a level of protection appropriate to the risks associated with the processing, by selecting the IT tools used and by operating them so as to ensure in respect of the data processed that:

- a) it is accessible to those authorised to access them (availability);
- b) authenticity and verification (authenticity of processing);
- c) that its unalterability can be verified (data integrity);
- d) it is accessible only to authorised persons and protected against unauthorised access (data confidentiality).

The Company ensures that the relevant employees are adequately trained to enforce the conditions of data security. The Company provides an adequate level of protection for

the processing of the data, in particular their storage, rectification and erasure, in the event of a request for information or an objection by the Data Subject.

### **Backup**

The Company backs up its electronically stored data on a daily basis. The Controller ensures that the backups are stored on its own server.

Legal basis for the processing for backups: legitimate interest of the Company (Article 6(1)(f) GDPR) to comply with the requirements of the GDPR and to ensure the continuous and uninterrupted availability of data generated in the course of its activities. The Company handles large amounts of data, and has a material interest in the safe storage and recovery of that data in the event of a breach.

The purpose of the processing is to increase data security, to preserve and restore documents relating to the Controller's operations in the event of a data security problem, and to ensure the continuity of work processes.

Duration of backup storage: up to 5 years.

### **7. Storage of personal data, processing**

Personal data are stored in paper and electronic form on the Company's servers at the Company's headquarter.

### **8. Processing of data, data transfer**

To achieve the data processing purposes set out in this Policy, the Company may engage the services of third parties to procure compliance with statutory obligations, to perform certain of its tasks, which services may include the processing of Data Subjects' personal data. Such third parties (hereinafter referred to as the "**Processor**") carry out the processing in accordance with the Company's instructions and in compliance with the provisions of applicable law. Only the personal data necessary for the purposes of the processing will be transferred to each Processor for processing.

### **9. Handling of personal data breaches**

The Company makes every effort to avoid personal data breaches. "Personal Data Breach": means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

The Controller will immediately notify the Hungarian National Authority for Data Protection and Freedom of Information of the personal data breach, unless the data

breach is unlikely to pose a risk to the rights and freedoms of the Data Subjects. The Controller keeps a record of personal data breaches, together with the actions taken in relation to the breach. If the personal data breach is grave (i.e. presumably poses a high risk to the rights and freedoms of the data subject), the Controller will inform the Data Subject of the personal data breach without undue delay.

## **10. Data Subject's rights related to the processing**

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

### The Data Subject's rights:

#### *a) Right of information / access*

The Data Subject has the right to obtain from the Company confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, the right to be informed of the personal data processed, the purposes of the processing, the categories of data, the recipients, the storage period, their rights and the source of the personal data.

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

#### *b) Rectification and erasure*

The Data Subject has the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the Data Subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### *c) Erasure/'right to be forgotten'*

The Data Subject has the right to obtain from the Company without undue delay the erasure of personal data concerning them if the purpose of the processing has ceased, the Data Subject has withdrawn their consent to the processing and there is no other legal basis for the processing, if the personal data have been unlawfully processed.

#### *d) restriction of the processing of the data;*

The Data Subject has the right to obtain from the Company 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 Company 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; or the Data Subject has objected to the processing; in which case the restriction applies pending the verification whether the legitimate grounds of the Company override those of the Data Subject.

Where processing is restricted on the basis of the above, such 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.

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

*e) The right to data portability*

The Data Subject has the right to receive the personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format and has the right to transfer those data to a third party controller without hindrance from the Company, if the processing is based on consent and the processing is automated. In exercising the right to data portability, the Data Subject has the right to request, where technically feasible, the direct transfer of personal data between controllers. The exercise of this right is without prejudice to the right to erasure. 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 exercise of the right shall not adversely affect the rights and freedoms of others.

*f) Objection*

The Data Subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. The Company shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

An exception to the above is where the decision is

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

g) *Right to withdraw consent*

Where the processing of personal data is based on the Data Subject’s consent, the Data Subject has the right to withdraw consent at any time. Where consent is withdrawn, the processing is terminated by the erasure of personal data, provided that there is no other legal ground for the processing of their personal data. The withdrawal of consent has no consequences for the Data Subject. However, the withdrawal of consent does not affect the lawfulness of the processing previously consented to.

The Data Subject is entitled to exercise the above rights in relation to the legal grounds as follows:

	<u>Consent</u>	<u>Performance of a contract</u>	<u>Legal obligation</u>	<u>Legitimate interest</u>
<u>providing information</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>correction</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>restriction</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>erasure</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>objection</u>				<input checked="" type="checkbox"/>
<u>data portability</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<u>withdrawal of consent</u>	<input checked="" type="checkbox"/>			
<u>complaints</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>remedies</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**11. Procedure in case of a request by the Data Subject:**

*The Data Subject may contact the Company representative identified in this Policy at any of the contact details provided herein with any of the above requests or other questions or requests concerning their personal data.*

The Company shall process the request within 30 days of receipt of the written request. If necessary, taking into account the complexity of the request or the number of pending requests, the Company may extend the time limit for processing the request. The Data Subject must be informed in advance of the fact and the reasons for the extension.

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

If the Data Subject does not agree with the decision of the Company or if the Company fails to comply with the applicable procedural time limit, the Data Subject may appeal to the supervisory authority or to a court.

## **12. Supervisory Authority**

If the Data Subject considers that the processing of their personal data by the Company violates the provisions of the data protection legislation in force, in particular the GDPR, they have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

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

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

Address: 1055 Budapest, Falk Miksa utca 9-11

Mailing address: 1363 Budapest, Pf.: 9

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

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

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

## **13. Right to bring an action (Right of access to a court)**

Irrespective of their right to lodge a complaint, Data Subjects may take judicial action if their rights under the GDPR have been infringed in the processing of their personal data. The Company may be sued as a Hungarian Controller before a Hungarian court.

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

The Data Subject may bring the action before the courts of their place of residence or their domicile. For contact details of the courts in Hungary click on the following link: <http://birosag.hu/torvenyszekek>.

If the Data Subject's habitual residence is in another Member State of the European Union, the action may also be brought before the competent courts of the Member State of habitual residence.

## **14. Miscellaneous**

The Company reserves the right to unilaterally amend this Policy at any time in accordance with the law.

This Policy is effective until further notice or until revoked.

Budapest, 01 November 2023

**Barré Technologies Zrt. / Controller**