

INFORMATION ON DATA PROTECTION ADDRESSED TO BUSINESS PARTNERS

We hereby ensure you that POZI DEVELOPMENT Kft. is committed to comply with the European and national rules on Data Protection. We inform you, that your personal data in respect of the business partnership established between you and POZI DEVELOPMENT Kft. („POZI DEVELOPMENT” or “Company”) is controlled by POZI DEVELOPMENT in accordance with the General Data Protection Regulation as follows:

Name of the data controller:

POZI DEVELOPMENT Kft.

Data protection officer:

Name: Bozó Tamás

Contact data of the data controller:

address: 1117 Budapest, Budafoki út 111. email: pozi.tech@pozi.tech website: www.pozi.tech

Purpose and legal basis of the data processing:

Purpose of data processing Establishment, performance or termination of the business/commercial/marketing relationship,

Legal basis of data processing The establishment or performance of the contract

Purpose of data processing Acknowledgement of the rights and fulfilment of the obligations in connection with business/commercial/marketing relationship

Legal basis of data processing The establishment or performance of the contract

Purpose of data processing Manage contracts, orders, deliveries, invoices and accounting relating to the customers

Legal basis of data processing The establishment or performance of the contract

Purpose of data processing Loyalty programme: conduct satisfaction surveys, manage claims and after-sales service

Legal basis of data processing The establishment or performance of the contract

Purpose of data processing Monitor customer relations: conduct studies, surveys and product tests

Legal basis of data processing Legitimate interest of the company in order to improve products and services provided by the company

Purpose of data processing Manage past-due payments and disputes

Legal basis of data processing Legitimate interest of the company in order to combat payment fraud and defend the company's rights through legal action

Purpose of data processing Produce commercial statistics

Legal basis of data processing Legitimate interest in order to analyse the company's commercial activity

Purpose of data processing Manage technical business marketing operations (e.g. standardisation, enrichment, deduplication)

Legal basis of data processing Legitimate interest in order to grow the company's commercial activity

Purpose of data processing Conduct marketing campaigns

Legal basis of data processing Legitimate interest in order to increase the company's commercial activity

Purpose of data processing Organise competitions, prize draws or any promotional campaign

Legal basis of data processing Consent of the data subject

Purpose of data processing Sell, lease or exchange client files

Legal basis of data processing The establishment or performance of the contract

Purpose of data processing Manage people's opinions of the products, services or content

Legal basis of data processing Legitimate interest in order improve products and services provided by the company

Purpose of data processing Manage requests for rights of access, rectification and protest

Legal basis of data processing Legal obligation (processing necessary for compliance with a legal obligation)

Purpose of data processing Maintain a list of those not wishing to be canvassed

Legal basis of data processing Legal obligation (processing necessary for compliance with a legal obligation)

Purpose of data processing Customer Relationship Management (CRM)

Legal basis of data processing The establishment or performance of the contract

Scope of processed data:

POZI DEVELOPMENT processes certain data on its business partners, depending on the nature of the business relationship, the content of the contract concluded with the business partner and the requirements of the relevant legislation.

The scope of the processed data may include the followings: name, contact data, status, position, any personal data relating to the management of the business partner, which helps the business relationship established with POZI DEVELOPMENT.

Term of data storage:

In respect of the rights and obligations related to the contractual relationship, we will process your personal data until the termination of the contractual relationship, the expiry of the limitation period of the rights and obligations arisen from the contractual relationship, or until the deadline specified in the legislation on the preservation period.

Personal data is retained for business marketing purposes for three years from the end of the commercial relationship.

The Company keeps the bank data only for the time needed to carry out the bank transaction. The bank card number and expiry date will be kept by the company in intermediate archiving for thirteen months

for reasons of proof. The bank card's security code is never retained for more time than is needed to conduct the transaction.

Data transmission and data processors:

We hereby inform you that POZI DEVELOPMENT may use data processor during the data processing. In such cases, personal data will be transferred to our partner in order to realize the purpose of the data processing and we hereby warrants that your data will be processed by the data processor explicitly only for the purpose described in section Purpose and legal basis of the data processing. We will provide information on the person of the data processor.

The Company will not transfer personal data to a third country outside the European Union.

The Company communicates the data to the following (pursuant to Point e) of Section 1. of Article 13 of the GDPR the following categories of recipients have access to your personal data):

The Company's affiliated companies

Partners, outside companies or subsidiaries of the same group of companies;

As part of their work recovering debts: organisations, officers of the court and ministerial officers;

The following persons have access to the personal data:

Authorised staff of the marketing department, sales department, departments in charge of managing customer relations and canvassing, administrative departments, logistics and IT departments, as well as those they report to;

Authorised staff of the departments in charge of audit (statutory auditor, departments in charge of internal audit procedures, etc.); Contractors' authorised staff.

Right of the data subjects:

Upon your request, we will inform you on the processing of your personal data and the circumstances of the data processing.

Upon your request, we will provide access to your personal data and information related to the data processing and we will ensure the enforcement of the right to data portability.

Upon your request, we will correct and complete your inaccurate personal data.

Upon your request, we will delete your personal data that we do not have a statutory obligation to store. In addition, you have the right to revoke any consent you may have given to the processing of your personal data. The legality of the processing of personal data until the point at which consent is revoked is not affected by the revocation.

Upon your request and if the applicable law allows it, we will restrict the processing of your personal data.

Right to appeal to the Authority:

The data subject may apply for legal remedies and complain to the National Privacy and Freedom Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság) in respect of the data processing: Seat: 1024 Budapest, Szilágyi Erzsébet fasor 22/C. Website: <http://www.naih.hu>

The data subjects also have the right to submit a claim to the court. The competent court to deal with your complaint is: The lawsuit may be brought at your choice before the court of your domicile or residence. The competent court according to the registered office of POZI DEVELOPMENT Kft.: Székesfehérvári General Court Postal address: 8002 Székesfehérvár Pf. 251.

We hereby inform you that if a statement is required from you in respect of establishment, performance or termination of contractual relationship or the certification of the rights and recognition of the obligations in connection with the above then our Company will always draw your attention on the facts, legal basis and purpose of data processing during the course of obtaining such statement, in respect of the personal data provided in the statement. If any official document is required for the validity of the statement (ID card, student card) our company will not process the data and / or the photo of the official document in any way, but the authorized employee of our Company will attest the presentation of the official document and its validity with his/her signature.