

INFORMATION ON PRIVACY RULES FOR PARTNER DATA

White Paper Consulting Ltd. (hereinafter referred to as the 'Company' also as the 'Data Controller') hereby discloses information about its practices in the processing of partner data, its organisational and technical measures for data protection, and its rights and right enforcement opportunities in the context of data processing. In the course of the necessary data processing, our Company pays special attention to the protection of personal data processed by it.

Definitions

Data Controller

The data controller is the Company (registered office: Sasadi út 167, 1112 Budapest)

Data Subject

All natural persons acting on behalf of individuals and legal entities if the Company purchases services from these natural persons or legal entities represented by them, or who establish a contractual relationship with the Company as agents, contractors, sponsors or suppliers (hereinafter referred to as the 'Partner').

Data Processing

Any operation or set of operations which is performed on personal and/or sensitive data, such as collection, inclusion, recording, organisation, storage, use, disclosure to the employer by transmission, alignment or combination, blocking, erasure or destruction and prevention of the data re-use.

Personal Data

Any information relating to an identified or identifiable natural person (hereinafter referred to as the '**Data Subject**'); 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;

Sensitive Data

Data that relate to the racial origin, membership of a national or ethnic minority, political opinion or party affiliation, religion or beliefs, trade union membership, health status, harmful passion, sex orientation or criminal record.

Third Party

Persons outside the Data Subject and the Company.

Processing Activities

Consent to the Processing of Personal Data

The Data Subject gives his or her consent to the processing and transfer of personal data related to him or her only by the signature of the contract, or by the acceptance of any other express legal statement (hereinafter jointly referred to as the 'Statement').

The Company does not process any sensitive data.

The Scope of Data Processed

By signing the Statement given to him or her by the Company, the Data Subject consents to the processing of the personal data contained in the contract, meaning that by signing the Statement he or she accepts the terms set out in this document.

The Purpose of Data Processing

The purpose of the processing of the personal data handed over to the Company in virtue of the Statement is the communication required for the fulfillment of the services rendered to the Company, entrepreneurial, sponsorship or assignment contracts with the Company as well as the settlement of accounts.

The collection, storage of personal data, the disclosure of personal data by transmission to third parties and any other data processing activity aligning with the data processing purpose will be carried out with no access for unauthorised persons.

Security of Personal Data

To ensure the security of the Data Subject's data, the Company uses technical and procedural rules to prevent unauthorised access to, alteration or transfer, deliberate and unintentional erasure or destruction of, these data.

The Company as a Data Controller is obliged to disclose, transmit personal data or provide documentation lawfully requested by any authorities for their information by empowerment given by the court, the public prosecutor's office, the National Authority for Data Protection and Freedom of Information, or the law.

Upon this request, the Company shall transmit the personal data of the Data Subject only in such a manner and to such extent as strictly necessary for the purpose of the request. Prior to the execution of any of the official requests for personal data, the Data Controller examines for each data whether the legal ground for the transfer really applies and, if necessary, requests the opinion of the Data Protection Supervisor.

The Scope of Persons Entitled to Process Personal Data

Only employees entitled to the processing of personal data by the Company are entitled and required to process personal data. To protect the personal data of the Data Subject, the Company defines the procedure for the processing of personal data and managing of eventual personal data breaches in its Privacy Policy.

Under the Privacy Policy, the employee involved in the processing of personal data is obliged to comply with the provisions of the relevant legislation and to preserve the secret that he or she becomes aware of by the data processing.

The Company does not sell, rent or disclose in whatever form the personal data of the Data Subject to any third party, including the email address of the Data Subject.

Duration of Data Processing, Rectification

Data on the Company's website visiting time (IP address, operating system, and browser data) are automatically deleted by the system when the browser is closed.

The Company retains the personal data of the Data Subject only for the duration of the contractual relationship existing between the Company and the Data Subject, or for the duration of enforcement period for claims arising therefrom, the so-called limitation period, after which they will be automatically deleted.

The length of the data processing period shall be extended by the time that the Company has a claim against the Data Subject or the legal person he represents. If any Data Subject or the legal person he represents is included in the Company's Permanent Partner List, in this list the Company only records data that are not considered personal data.

If any Data Subject or the legal person he or she represents so requests, the Company shall be entitled to process his or her personal data (telephone number, email address, etc.) beyond the above deadline, subject to the express consent of the Data Subject, until the relevant Data Subject's Statement is withdrawn.

The Data Subject is responsible for the accuracy of the information provided by him or her and may, at any time, request rectification of his or her data whenever they change. To his request, we rectify the data that are not true and erase the incomplete or incorrect data. When this is expressly requested by the Data Subject, the Company sends a specific notice of the rectification and erasure in an email to the exact email address provided for this purpose.

The Legal Basis for the Processing of Personal Data, the Erasure of Personal Data

The legal basis for the processing of the personal data of the Data Subject is the Data Subject's Statement, but if the contract is validly concluded between the Company and the Data Subject or the legal person he or she represents, in the context of the contract fulfillment the legal basis for the processing of data is the contractual relationship.

If any Data Subject or the legal person he or she represents so requests, the Company shall be entitled to process his or her personal data (telephone number, email address, etc.) beyond the above deadline, subject to the express consent of the Data Subject, until the Data Subject's Declaration is withdrawn. In this case, the legal basis for personal data processing is the Data Subject's Statement.

Any Data Subject may request information about the processing of his or her personal data. Upon the request of the Data Subject the Data Controller shall, within 30 days, provide written information about the data of the Data Subject processed by the Company, the purpose of

data processing, its legal grounds and duration, the name, address (registered seat) of the data processor and its activities associated with data processing, as well as who has or will receive the data and for what purposes.

The Data Subject may object to the processing of his or her personal data, and, in particular, he or she may request the rectification and erasure of his or her personal data through the Company's mailing address or via email sent to the following address: bernadett.forizs@whitepaperconsulting.hu

Changes

In case of any change that materially affects the service or the way the personal data are processed, the Data Controller sends a notice to the Data Subject to the previously provided email address. If, after that, the Data Subject agrees not to accept the changed terms, he or she may indicate this within eight days of the email notification via email sent to the following address: bernadett.forizs@whitepaperconsulting.hu

Security

The personal data entered on the www.whitepaperconsulting.hu website are stored by the contractual IT service provider of the Company on its server, providing appropriate security measures. Personal data are backed up every day, and the backup can also be stored on other similarly secure servers should the personal data stored on the own server be damaged because of any technical or human error.

Enforcement of Rights

If the Data Subject assumes that the Company has violated his or her right to the protection of personal data, he or she shall inform the Company thereof for the Company to investigate any possible infringement and to take the necessary measures. The Data Subject may enforce his or her right to the protection of his or her personal data in civil court or contact the National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/C, postal address: 1530 Budapest, Pf. 5) and request the assistance of the Data Protection Supervisor.

The detailed rules for this and the obligations of the Data Controller are laid down *in 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 Act CXII of 2011 on the right of informational self-determination and on freedom of information.*

Stipulation

The Company as a Data Controller reserves the right to change the privacy statement signed by the Data Subject, in particular, but not exclusively, in the event of a change in the law, but changing the data processing as described above may not mean different processing than the original purpose of the personal data. The Company as a Data Controller shall publish the information relating thereto on its website 15 days prior to the action.

Having understood and acknowledged the information, I hereby declare that I give my data voluntarily and agree to the processing: