

Privacy notice

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1. Purpose, scope

The purpose of this information notice is to inform you that our company, **Druit Szolgáltató Zártkörűen Működő Részvénytársaság** (registered office: 1171 Budapest, Berky Lili u. 56., company registration number: 01-10-142055, tax number: 32093058-2-42) as data controller (hereinafter: **Data Controller** or the **Company**) to ensure that all natural persons concerned by data processing have the possibility to obtain information enabling them to ascertain how their data are processed and to be assured that their fundamental freedoms and their rights to the processing, protection and privacy of their personal data are respected at all times during the processing of their personal data, regardless of their nationality or place of residence.

This notice applies to all processing carried out by our Company, regardless of the form in which it is presented. Given that the employees of our Company are informed in a separate document about the processing of personal data relating to them, information on the processing of the data of employees and workers is not included in this privacy notice.

2. Information about the data controller

Our Company is the data controller for the data processing activities listed in this notice.

If data subjects have any questions or comments about the processing of their personal data, they can contact us using the following contact details:

Name: **Druit Service Provider Private Limited Company**

Registered office and mailing address: **1171 Budapest, Berky Lili u. 56 .**

Phone number: **+36 20 458 6628**

E-mail address: **office [at] druit.hu**

3. Concepts

Below is a brief explanation of the terms used in this leaflet:

- **Personal Data:** any information relating to a natural person who is identified, directly or indirectly, or who can be identified on the basis of one or more factors or attributes which identifies or identifies that natural person.
- **Data processing:** any operation on personal data, regardless of the means by which it is carried out; accordingly, data processing includes, but is not limited to, collection, recording, organisation, structuring, storage, adaptation, alteration, consultation, consultation, retrieval, use, disclosure, transmission, dissemination, making available by any means, alignment, combination, restriction, erasure, destruction.
- **Controller:** Druit Service Provider Ltd., which determines the purposes and means of the processing of personal data.
- **Processing:** the performance of technical tasks on personal data related to processing operations, regardless of the method and means used and the place of application.
- **Processor:** a natural or legal person who processes personal data on behalf of and on behalf of the controller.
- **GDPR:** the General Data Protection Regulation 2016/679 of the European Parliament and of the Council, which sets out binding rules on the processing of personal data and on the exercise of data subjects' rights in relation to the processing of their personal data.
- **Recipient:** a natural or legal person, public authority or other body with whom or to which personal data are disclosed.

- **Pseudonymisation:** operations which, once carried out, it is no longer possible to determine to which specific person the personal data relate in the absence of additional information, if the additional information is kept separately and it is technically ensured that the personal data cannot be linked to identifiable natural persons.
- **Anonymisation:** operations which, once carried out, no longer make it possible to identify the specific individual to whom the personal data relate, i.e. the data lose their personal character and no longer allow the identification of any natural person identifiable, and the link between the data subject and the data can no longer be established.
- **Supervisory Authority:** an independent authority established to protect the rights and freedoms of natural persons with regard to the processing of personal data and to facilitate the free flow of personal data within the EU; in Hungary, the National Authority for Data Protection and Freedom of Information.
- **Data breach:** a breach of data security resulting in the accidental or unlawful destruction, loss, alteration, disclosure to unauthorised persons or access by unauthorised persons of personal data transmitted, stored or otherwise processed.
- **Cookie:** also known as a "cookie", a so-called anonymous visitor identifier, which is placed on the computer of the data subject visiting the <https://druit.hu/> website and read back by our Company. A cookie is a unique piece of data that can be used to save the settings used on the website and to track how the visitor has accessed the website and what actions he or she has performed there.
- **Website:** an online platform accessible at <https://druit.hu/> URL, which data subjects visit to request a quote or to contact our Company.

4. Data management methods and principles

On the one hand, we process, store and use personal data that the data subjects provide directly or to which the data subjects give access or authorize our Company to access, in order to achieve the purposes of the processing as set out in this notice. On the other hand, we also process data of data subjects which are not provided by the data subject but by third parties with whom we have a contractual or other type of relationship.

We take particular care to ensure that the personal data we process is only accessed by authorised persons, both within our organisation and our data processing partners, and only to the extent and for the duration strictly necessary for the performance of their tasks or activities.

We inform the data subjects that their data are processed not only by our Company but also by data processors working in cooperation with us, with the rules for the processing of personal data being set out in a separate contract in each case. For further information on our data processors, please see point 13 of this notice. Section 14 of this notice covers transfers of data where we are approached by official bodies and we comply with our legal obligations when we transfer the data to them.

We process the data of data subjects only in accordance with the applicable legal requirements and for the specific and legitimate purposes of data processing as clearly set out by our Company in this Notice. All personal data that we become aware of will be processed lawfully and fairly and in a way that is transparent to data subjects throughout the processing. We inform data subjects that in each case we only process personal data that are adequate, relevant and strictly necessary for the purposes for which they are processed.

In determining the way in which data is processed, and throughout the entire data processing process, we implement technical and organisational measures to ensure that data protection

principles and data subjects' rights are respected and protected. The measures put in place by our Company as a data controller have been determined after taking into account and assessing the state of the art, the costs of implementation and the risks to the rights of natural persons.

We strive to ensure that the personal data we hold and process is always accurate and up to date, and we will take reasonable steps to ensure that inaccurate or incorrect data is corrected or deleted as soon as possible. We ask data subjects to help us to meet this obligation and to let us know if any of the information they have previously provided has changed or otherwise needs to be corrected.

Data subjects' data will be stored only for as long as strictly necessary for the specific purpose of the processing. In processing the data, we will take all technical and organisational measures necessary to ensure the security of the personal data, including, but not limited to, protection against unlawful processing, accidental loss, destruction or damage. We also pay particular attention to the fact that personal data in respect of which the purpose of the processing has been fulfilled, the period for which the data are processed has expired or if the data subject has made such a request, are deleted without undue delay or, if deletion is not possible for any reason, are anonymised in order to ensure that the link between the processed data and the data subject can no longer be established.

In any case where we intend to use personal data for a purpose other than the original purpose set out in this notice, we will provide prior written notice to the data subject, indicating the new purpose of the processing and additional information about the processing, and we will ensure that we have a legal basis for processing the personal data.

5. Data processing related to contacting IT professionals

A. Scope and source of data processed

On the one hand, the data processing covers the data of IT professionals who contact our Company directly by e-mail because they are interested in carrying out a specific IT project. All personal data provided by the data subjects will be processed in this case.

On the other hand, our Company's data processing covers the data of IT professionals whose data and CVs are available on the LinkedIn community portal and who, in our Company's opinion, may be suitable for IT project tasks, taking into account their qualifications and professional experience. Our Company applies to the data of the data subjects that they have uploaded to this platform for the purpose of applying for a job or that they have sent via LinkedIn.

B. Purpose of data processing

The purpose of data processing is to contact the IT professional concerned directly and to contact him or her, and, if the data subject is interested in contributing to an IT project task defined by our Company, to get to know the data subject in the context of an interview. The purpose of data processing is to enable us to ascertain to our reasonable satisfaction that the data subject, as an IT professional, has the knowledge, skills and professional experience necessary to perform the IT project task in question in accordance with the contract.

C. Legal basis for data processing

The legal basis for the processing of data of data subjects who contact our Company and provide their data themselves is the consent of the data subject.

For data subjects who are contacted by our Company, the processing of personal data is based on our legitimate interest. In order to apply this legal basis, we have carried out the balancing of interests test, the results of which have shown that our Company's interest in processing the data

is stronger and more important than the data subject's interest in not having his or her personal data processed, as our Company has a significant interest in being able to perform the IT project tasks we undertake with the assistance of IT professionals who have the skills and experience necessary to perform the tasks in question. It would be a significant difficulty for the operation of our Company and the continuation of its business if we were not able to process the data of data subjects whose data are available on the LinkedIn social networking platform for the purposes described in point 5.B.

D. Duration of data processing

The processing of data of data subjects who have initiated direct contact with our Company will continue until the data subjects withdraw their consent.

We process the data of the data subjects who are contacted by our Company until they object to this, but in the absence of objections, the data processing will not last longer than 2 (two) years from the date of collection of the data by our Company. Data subjects whose data we process on the basis of our legitimate interest may object to the processing on grounds relating to their particular situation. We inform data subjects that the submission of a request to object does not imply the immediate cessation of processing and the erasure of the data, which will only take place if, after examining the request, we establish that the processing is not justified by compelling legitimate grounds which override the legitimate interests, rights and freedoms of the data subjects or are necessary for the establishment, exercise or defence of legal claims.

6. Data management of sole trader partners

A. Scope and source of data processed

Our Company processes the personal data of IT professionals who are subcontracted to us and who are considered to be self-employed, which are indicated in the contract and which are provided by the data subject after the conclusion of the contract. We also process personal data contained in the CV of the IT professional concerned.

The data subjects' place and date of birth and mother's name will also be processed if our Company has a claim or demand against the data subject based on a contract with the data subject that we are pursuing through legal action. The data listed above are obtained directly from the data subject, except for the data necessary for the enforcement of a claim (place and date of birth, mother's name), which are obtained by means of a request for data from public registers.

In addition to the above, we also process the data of self-employed persons from whom we use various services. In such cases, the data processing covers the data contained in the invoice issued by the data subject and the data necessary to contact him/her. The source of the data in this case is also the data subject.

B. Purpose of data processing

We process the data of self-employed IT professionals in order to be able to conclude and maintain a contract with the data subjects for the performance of IT project tasks, and if the contract is terminated for any reason, the data processing is also necessary to be able to fully terminate the legal relationship and to settle the account with the data subject.

In the event that a self-employed IT professional who has entered into a contract with us fails to comply with the payment obligation arising from the contract and we need to pursue legal action against the data subject, we will process the personal data for the purpose of the successful outcome of those proceedings.

If the self-employed IT professional consents to the further processing of his or her contact details after the contract has been completed, the purpose of the processing is to contact the data subject directly in order to conclude a new contract for the performance of an IT project.

The purpose of processing the data of individual contractors providing services to our company is to enable us to use those services and to fulfil our obligations under the contract, including paying the data subject for the services provided.

C. Legal basis for data processing

The legal basis for the processing of personal data relating to self-employed IT professionals, which is included in the contract and necessary for the maintenance of the contractual relationship between the self-employed IT professionals and our Company and for the ongoing relationship with them, is the contract between our Company and the data subject.

If the purpose of the processing of personal data is the legal enforcement of a claim against the data subject arising in connection with a contract, which the data subject does not voluntarily fulfil, the legal basis for the processing is also the legitimate interest of our Company, for which we have applied the balancing of interests test. The assessment of the interests of our Company and of the data subjects has led us to conclude that our interest in processing personal data necessary to pursue our legitimate claims against data subjects who do not comply voluntarily is stronger and more important than the interest of the data subjects in not having access to and processing the data necessary to pursue their claims. Without the processing of personal data, we would not be able to legally enforce the claim arising from the contract with the data subject to which our Company is legally entitled against the IT professional who has not voluntarily performed.

The processing of data after the termination of the contract with the self-employed persons, which includes the contact details of the data subjects, is based on the consent of the data subjects.

In the case of self-employed persons from whom we obtain a service, the legal basis for processing is the contract concluded with the self-employed person for the provision of the service and its performance.

D. Duration of data processing

The duration of the processing of data in the event that we have fully accounted for the IT professional in the context of the termination of the contractual relationship with the individual entrepreneur concerned, is until the termination of the contractual relationship. If the data subject explicitly consents to being contacted by us in the future for the purpose of concluding a new contract for the performance of an IT project, his/her contact data will be processed for a further period of 3 (three) years after the termination of the previous contract with him/her. If the data subject withdraws his or her consent before the expiry of the 3 (three) year period, the processing will continue until receipt of this withdrawal.

If we have an outstanding contractual claim against the IT professional, which we are pursuing through legal proceedings, the processing of personal data will continue until the proceedings to enforce the claim have been finally and conclusively concluded.

Notwithstanding the above, the data contained in the invoices received by our Company and issued by the parties concerned will be kept for 8 years from the date of issue of each invoice or the date of preparation of the records, in accordance with our obligation to keep records of the invoices and the customers forming part of the accounting, pursuant to Section 169 (2) of the Act on Accounting.

In the case of individual contractors from whom we use various services, the data processing will continue until our contract with the individual contractor concerned is fully completed. By way of derogation from this, data contained in invoices issued by sole proprietors are processed for 8 years from the date of issue of each invoice or the date of the compilation of the records, based on our obligation to keep records of invoices and of the customers forming part of the accounting, pursuant to Section 169 (2) of the Act on Accounting.

7. Data management of IT professionals appointed by subcontracting partners

A. Scope and source of data processed

Our Company processes the following personal data of the data subjects: name, telephone number, e-mail address, qualifications, professional experience and, in addition to the above, the data contained in the CV of the data subject. The source of the personal data is the subcontractor who assigns the IT professional concerned to the project task.

B. Purpose of data processing

The purpose of the data management is to enable us to ascertain, on a credible basis, that the appointed professional has the knowledge, expertise and professional experience necessary to be able to perform the IT project tasks ordered by us from the subcontractor under a separate contract in accordance with the contract, and to verify this fact to our contractual partner who has ordered the performance of the IT project tasks from our Company. The purpose of the processing of contact data is to ensure and facilitate direct contact between our Company or our subcontractors and the parties concerned.

C. Legal basis for data processing

The legal basis for the processing of the data is the legitimate interest of our Company and our contractual partners, i.e. the client of the IT project task and the subcontractor who has appointed the data subject to perform the task. For the processing of data based on legitimate interest, we have conducted an interest balancing test, the results of which are documented in writing. In this process, we compared the legitimate interests and fundamental rights of our Company, our clients and our subcontractors, and the data subjects, and concluded that our interest in processing the data is stronger and more important than the interest of the data subjects not to have their data processed. Not being able to process the data would make it extremely difficult and, in some cases, impossible for us to maintain our ongoing business and to perform certain contracts, and would also constitute a significant obstacle to the fulfilment of our obligation to cooperate under certain contracts, and therefore the primacy of our legitimate interests over the legitimate interests of the data subjects is justified. If the data subject so requests in writing, we will provide him or her with the opportunity to see the detailed balancing test.

As the legal basis for the processing described in this point is the legitimate interest of our Company, data subjects may object to the processing on grounds relating to their own situation. We inform data subjects that the submission of a request to object does not imply the immediate cessation of processing and the erasure of the data, which will only take place if, after examining the request, we establish that the processing is not justified by compelling legitimate grounds which override the legitimate interests, rights and freedoms of the data subjects or are necessary for the establishment, exercise or defence of legal claims.

D. Duration of data processing

The processing of the personal data of the data subject shall continue until the data subject objects to the processing. On the other hand, the processing of data that allow contacting the data subject will continue until the date of the termination of our Company without legal succession, with the

exception that access to the data subject's data will be allowed, exceptionally, to the extent strictly necessary and only to specifically authorised personnel, after the termination of the contract with the subcontractor that appointed the IT professional to perform the task.

8. Data management of contracted contacts

A. Scope and source of data processed

We process the data of the data subject for the purpose of contacting him or her, which is provided to us by the partner contracting with our Company who has designated him or her in order to facilitate contact and communication with him or her; if the data subject provides any additional data, we also process it. The source of the data provided by a partner of our Company is the partner itself, whereas if we receive any data directly from the data subject, the data subject is considered to be the source of the data.

B. Purpose of data processing

The primary purpose of processing the data is to enable us to cooperate with the partner in the performance of our obligations under the contract, to comply with our obligation to notify you as required by the contract, to lawfully make all legal declarations required under the contract and to consult with the partner at short notice in the event of any questions arising in the course of performance. The knowledge and processing of personal data concerning the data subject is necessary to ensure the continuous communication with the partner throughout the duration of the cooperation .

C. Legal basis for data processing

The processing of the data subject's data is based on the legitimate interests of our Company or our partner. In order to choose this legal basis, a balancing of interests test was carried out in accordance with data protection law, comparing our legitimate interests and the fundamental rights of our partner and the data subject. As a result, it was concluded that the interest of our Company and our partner to process the data of the contact persons in order to facilitate and accelerate direct consultation and communication with the partner is stronger and more pronounced than the interest of the data subject not to process their data. If the data subject so requests in writing, we will provide him or her with the opportunity to see the detailed interest test.

As the legal basis for the processing described in this point is the legitimate interest of our Company, data subjects may object to the processing on grounds relating to their own situation. We inform data subjects that the submission of a request to object does not imply the immediate cessation of processing and the erasure of the data, which will only take place if, after examining the request, we establish that the processing is not justified by compelling legitimate grounds which override the legitimate interests, rights and freedoms of the data subjects or are necessary for the establishment, exercise or defence of legal claims.

D. Duration of data processing

We will process the data concerned until the termination of our Company without legal successor - taking into account that we may need the data after the termination of the contract with the partner, and that it would be disproportionate to expect that the data of the contact persons should be deleted or contracts and correspondence containing the data should be destroyed after the termination of the contract, other paper or electronic documents - by ensuring that, immediately after the termination of the underlying legal relationship, we take steps to ensure that the data subject's data are subsequently only accessible to the extent strictly necessary and only to the extent duly authorised.

9. Processing of job applicants' data

A. Scope and source of data processed

We process the data of persons who submit their CVs to us in order to apply for vacancies in our Company. The data processed will be those provided by the data subject in his/her CV. The source of the data is the data subject who submits a job application to our Company by email, via the website or by LinkedIn message.

B. Purpose of data processing

The purpose of processing the data is to contact the applicant and to verify his/her suitability to perform the duties related to the vacant position, including by means of an interview, to assess the application and to notify the person concerned of the result of the assessment. If the data subject consents to being contacted by our Company after the selection procedure has been completed in order to be informed of future job opportunities, the purpose of the processing is to send this information to the data subject and to contact him or her.

C. Legal basis for data processing

We process applicants' data on the basis of our legitimate interest until the end of the relevant application procedure, for which we have carried out a balancing of interests test, the result of which has shown that our interest in data processing is stronger and more important than the interest of the applicants concerned that their data not be processed. Our legitimate interest is demonstrated by the fact that, without the processing of the data necessary to contact the data subject and the data contained in his/her CV, in particular the data relating to the candidate's qualifications and professional experience, we would not be able to ascertain whether the candidate is or could be qualified for the position applied for. If the person concerned so requests in writing, he or she will be given the opportunity to consult the detailed interest test.

As the legal basis for data processing is the legitimate interest of our Company, data subjects may object to data processing on grounds relating to their particular situation. We inform data subjects that the submission of a request to object does not imply the immediate cessation of processing and the erasure of the data, which will only take place if, after examining the request, we establish that the processing is not justified on compelling legitimate grounds which override the legitimate interests, rights and freedoms of the data subjects or are necessary for the establishment, exercise or defence of legal claims.

The legal basis for the processing of data after the end of the application procedure is the consent of the data subject, given by filling in and signing the consent form sent to him/her.

D. Duration of data processing

The processing of data subjects' data lasts until the position is filled. If the data subject expressly consents to being informed of future job opportunities at our Company that are relevant to him/her on the basis of his/her qualifications or professional experience, his/her name, telephone number and e-mail address will be processed for a further 3 (three) years after the selection procedure has been completed. If the data subject withdraws his or her consent before the expiry of the above 3 (three) year period, the processing will continue until receipt of this statement.

10. Processing of data relating to employees' dependants

A. Scope and source of data processed

With regard to the data subjects, our Company processes the following personal data: name, tax identification number, employer, tax number. We inform the data subjects that in order to provide

benefits and discounts to their relative employed by our Company, we process the following data of their child jointly raised with their relative: name, tax identification number, date of birth.

The above data are provided to us by the relatives of the data subjects who are employed by us as employees, and are therefore considered to be the source of the data.

B. Purpose of data processing

The purpose of data processing is to enable the tax authorities to receive the notifications necessary for the employee who is a relative of the person concerned to claim the benefits. The purpose of processing data relating to children is to make the necessary notifications to the tax authorities for the purpose of claiming the benefits of the relative of the person concerned, to verify whether the employee is entitled to additional leave and to make the necessary notifications to the competent authorities. We do not process or use personal data for any other purposes.

C. Legal basis for data processing

We inform the data subjects that the processing of the data is based on the fulfilment of a legal obligation of our Company, which is provided for by Section 48 (3), (3a) and (3b) of the SJSA on the one hand, and Section 3 (10), (11) of the SJSA on the other hand. The legal basis for the processing of data relating to children is also the fulfilment of a legal obligation incumbent on our Company, which is based on the provisions of Section 48 (3), (3a) and (3b) of the SJSA and Section 118 of Act I of 2012 ("Labour Act").

D. Duration of data processing

Pursuant to Art. 78 (3) and (4), we process the personal data of the data subjects until the expiry of the statute of limitations for the right to tax assessment, i.e. until the end of the 5th year following the submission of the tax return or the filing of the data request relating to the relative of the data subject with whom our Company has concluded an employment contract, or, failing this, until the end of the last day of the tax payment year. We process the data of the children for 5 years after the age of retirement of the relative concerned as an employee of our Company pursuant to Article 99/A (1) of Act LXXXI of 1997 ("Act").

11. Processing of data of persons requesting a quote from our Company

A. Scope and source of data processed

If the data subject requests an offer from our Company by filling in the online form on the website <https://druit.hu/>, we will process the personal data that he or she has provided during this contact. The source of this personal data is the data subject.

B. Purpose of data processing

The purpose of processing the personal data provided when requesting a quote is to contact the data subject and provide him or her with a quote.

C. Legal basis for data processing

The legal basis for the processing of personal data provided during the application is the consent of the data subject, which is given by ticking the checkbox on the website's online form submission interface.

D. Duration of data processing

Our Company will process the data of the data subject until the consent is withdrawn, with the understanding that in the absence of such consent, the processing of the data will not last longer than 10 (ten) months from the date of the offer.

12. Processing of personal data through cookies

A. Scope and source of data processed

Detailed information about the cookies we use can be found in the table below:

Cookie name	Purpose of the cookie	Service provider	How long is the cookie stored in the browser?
CookieConsent	It stores the status of the user's cookie choices.	DruIT Zrt.	1 year
ANID	Used to display non-personalised Google ads on the website.	Google Ireland Ltd.	until 2030
CONSENT	It stores the status of the user's cookie choices.	Google Ireland Ltd.	2 years
NID	Used to store the user's preferences on the website.	Google Ireland Ltd.	6 months from last use
_GRECAPTCHA	This is to protect the website against spam.	Google Ireland Ltd.	6 months

B. Purpose of data processing

We inform the data subjects that we use anonymous visitor identifiers, also known as cookies, on our website, the main purpose of which is to simplify the browsing process. We inform data subjects that we use cookies on our website (<https://druit.hu/>).

C. Legal basis for data processing

When the data subject visits our website, the legal basis for the processing of the data collected by the cookie installed on the device used by the data subject during browsing or on the data subject's browser is the data subject's consent, which is given by the data subject through the appropriate settings in the cookie bar that pops up on the website.

D. Duration of data processing

The cookies used by our Company will be automatically deleted from the device used by the data subject or from the data subject's browser after the period of time specified in the table above. We inform the data subject that the duration of the data processing is the same, i.e. the data collected and stored by the cookies will be processed for the period indicated in the table above.

Please note that you can delete cookies from your browsing device at any time and you can also disable the use of cookies in your browser, however, for technical reasons, you may not be able to use some of the functions of our website at all or only to a limited extent. You can usually manage cookies by going to the Tools/Preferences menu of your browser and selecting Privacy, cookie or tracking.

You can click on the links below for more help on how to configure these settings, depending on the type of browser you are using:

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu&co=GENIE.Platform%3DDesktop&oco=1>
- Mozilla Firefox: <https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldal-tarolnak-szami>
- Microsoft Internet Explorer: <https://support.microsoft.com/hu-hu/windows/cookie-k-t%C3%B6rl%C3%A9se-%C3%A9s-kezel%C3%A9se-168dab11-0753-043d-7c16-ed5947fc64d>
- Microsoft Edge: <https://support.microsoft.com/hu-hu/microsoft-edge/cookie-k-t%C3%B6rl%C3%A9se-a-microsoft-edge-ben-63947406-40ac-c3b8-57b9-2a946a29ae09>
- Safari (on Apple Mac): <https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>
- Safari (on other Apple smart devices): <https://support.apple.com/hu-hu/HT201265>

13. Use of data processors

We inform data subjects that for certain data processing operations, we use the assistance of data processors on the basis of a data processing contract included in a separate deed. In this context, we ensure that our processing partners provide the necessary guarantees to ensure compliance with the applicable data protection rules and to take the necessary measures to protect the rights of data subjects.

Please note that data processors cannot make any substantive decisions regarding the processing of data, as they may process personal data that they have access to only in accordance with our instructions and provisions and may not process or process it for their own purposes.

A. Calendly LLC (address: 271 17th St NW Ste 1000, Atlanta, Georgia, 30363, United States, e-mail: support[at]calendly.com)

- personal data: at <https://druit.hu/> and <https://druit.eu> all personal data (name, email address) provided by the data subjects via the websites
- Activity 1: provision of a simple appointment booking service via the websites <https://druit.hu/> and <https://druit.eu>.

B. Abiza Kft. (address: 2500 Esztergom, Siszler út 37/B., e-mail: szilvia[at]javorfi.hu)

- personal data: the name, registered office, tax number and bank account number of the self-employed;
- activity: provision of accounting services to our Company.

14. Data transmission

In the event that our Company receives a formal request, stating the reason for the transfer, from a public authority or a court of law, which is authorised by law to transfer some or all of the personal data we process, we are obliged and entitled to transfer the personal data requested by the public authority or court to these bodies in order to fulfil this obligation.

15. Rights of persons concerned, how to exercise rights

In the course of our processing activities, we ensure that all data subjects are able to exercise their rights to the personal data processed about them for one of the purposes listed in this notice to the fullest extent possible, without any unjustified restriction or hindrance.

We will also ensure that the owners of personal data have the right of access, the right to erasure, rectification and restriction of processing, the right to object in case of processing based on

legitimate interests, the right to withdraw consent and the right to lodge a complaint against processing, as set out below.

A. Right of access to data

Data subjects can ask us at any time for information about what data we process about them and why and how we process that data. If we receive such a written request, we will provide the data subject with a copy of the data processed about him or her, inform him or her of the purposes of the processing and the recipients to whom we disclose his or her personal data, the envisaged duration of the storage, the rights to which he or she is entitled and how to exercise those rights.

We can only fulfil your request for a copy of the data free of charge for the first copy of the document containing the data. If, after the request has been fulfilled, the data subject requests additional copies of the data and/or makes a new request with the same content within a short period of time, we may charge an additional fee for fulfilling the request; we will provide information on the exact amount of the fee payable in our response to your request.

To avoid any misunderstanding in the future, we would like to point out now that we can only comply with data subjects' requests for a copy of their data if and to the extent that this does not infringe the rights and freedoms of other natural persons.

B. Right to rectification of data

If the data subject becomes aware that his or her personal data is being processed inaccurately or is incomplete, he or she may at any time request in writing that the data be corrected or completed, providing the correct or missing data. Our company will receive such requests from data subjects by e-mail to office [at] druit.hu .

C. Right to restrict processing

We inform the data subjects that they may also request our Company to restrict the processing of their personal data in the following cases and for the following periods:

- if the data subject becomes aware that his or her personal data are being processed inaccurately; in this case, the restriction may be requested until the accuracy of the personal data is verified;
- if the data subject considers that unlawful processing has taken place and therefore explicitly requests that his or her personal data not be deleted;
- where we no longer need the data for the purposes for which we have collected it, but the data subject requests it for the establishment, exercise or defence of legal claims;
- if the data subject has objected to processing based on legitimate interests but his or her request has been rejected; in such a case, the restriction shall apply for the period until it is determined whether the legitimate interests of our Company or another third party prevail over the legitimate interests of the data subject.

If the data subject's request is justified, we will inform all recipients to whom we have previously disclosed the personal data of the restriction of processing. Please note that if such a request is made, the data subject of the restriction will not be processed but will continue to be stored. If the data subject has consented to the continued processing of the data despite a request for restriction, or if the processing is necessary for the establishment, exercise or defence of legal claims or is justified on grounds of the legal or legitimate interests of another natural or legal person or on grounds of public interest in the Union or in a Member State, we will continue to process the data.

If the reason for the restriction of processing indicated by the data subject no longer applies, we will inform you in writing of the lifting of the restriction and the date of lifting no later than 15 days before the lifting.

D. Right to withdraw consent to data processing

Where processing is based on the data subject's consent, the data subject may withdraw his or her consent at any time. Please note that the withdrawal of consent is only valid in writing and should be sent to the e-mail address office [at] druit.hu. We inform the data subject that the withdrawal of consent does not affect the lawfulness of the processing activities of our Company that were carried out with the consent of the data subject prior to the receipt of the withdrawal.

Following the withdrawal of consent, we will delete the data subject's data from our records, unless we also process the data on another legal basis (e.g. contract, legitimate interest, legal requirement) or if we also process the data subject's data subject to the withdrawal of consent on the basis of the data subject's consent but for another purpose.

E. Objection to data processing

Where we process the data subject's data on the basis of a legitimate interest of our Company or a third party, the data subject may object to the processing at any time on grounds relating to his or her particular situation. Please note that in this case, we will no longer process your personal data, unless the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

F. Right to erasure of data

Data subjects may request that we delete personal data processed about them without undue delay in any of the following cases:

- the purpose of the processing has ceased;
- where the processing is based on consent, the data subject has opted out and no other legal basis for further processing can be established;
- in the case of processing based on legitimate interests, the data subject has objected to the processing and there are no overriding reasons justifying further processing;
- data erasure is required by law;
- unlawful processing has taken place.

We cannot comply with a request for data erasure if the further processing of the data is necessary for the exercise and protection of a legal interest, the exercise of the right to freedom of expression and information, the fulfilment of a legal obligation or task, the fulfilment of a statistical or research purpose or for reasons of public health.

Please note that once the request has been fulfilled, we can no longer recover the deleted data.

G. Examination of applications from interested parties

We will start the processing of any requests relating to the processing of personal data or requests for the exercise of the data subject's rights listed in points A to F above, regardless of their content, as soon as we receive them and will inform you of the outcome in writing without undue delay, but no later than 1 month from the date of receipt.

We may extend the above time limit for responding by up to 2 additional months due to the complexity of the request or the large number of additional data subjects' requests received by our Company. If an extension of the time limit for responding to the data subject's request is

granted, we will inform the data subject in writing within 1 month of receipt of the request at the latest, stating the reason for the delay. No extension may be granted if we consider that no data protection measure is necessary on the basis of the data subject's request. In such a case, we will respond to the data subject's request without undue delay and at the latest within 1 month of receipt of the request, informing him or her of the reasons why no further action has been taken and of the remedies available to him or her against our decision.

We will not charge a fee for the measures taken to respond to or comply with a request, unless the data subject's request is unfounded or is made again with the same content after a previous request has been dealt with; in this case, we may charge the data subject a reasonable fee proportionate to the administrative costs incurred in complying with the request, the exact amount of which will be provided at the time of responding to the request.

H. Remedies

We strive to ensure that all aspects of our data management activities comply with the requirements of lawfulness, fairness and data security, so we ask data subjects to contact us if they are not satisfied with the way their data is handled for any reason. Our contact details are set out in section 2 of this notice.

In all cases, we will investigate the complaint submitted and inform the person concerned of the outcome of the investigation in a reasoned decision without undue delay, but no later than 1 month after receipt of the complaint.

If the data subject considers that the processing of his or her data was unlawful, he or she may also lodge a complaint with the **National Authority for Data Protection and Freedom of Information** (registered office: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1374 Budapest, Pf. 603., e-mail address: ugyfelszolgalat@naih.hu). The rules on the receipt and handling of complaints and on the conduct of official proceedings can be found at www.naih.hu. Furthermore, the data subjects are informed that if they disagree with the Authority's decision or if the Authority does not investigate their complaint within the deadline, or if the Authority does not inform them within 3 months of the procedural developments concerning their complaint or of the outcome of the complaint, they may appeal to the competent court of the seat of the Authority (Fővárosi Tribunal, address: 1055 Budapest, Markó u. 27., postal address: 1363 Budapest, Pf. 16.).

If the data subject considers that his or her rights have been infringed as a result of the improper processing of his or her data, he or she may also apply directly to the **Metropolitan Court of Budapest** (address: 1055 Budapest, Markó u. 27., postal address: 1363 Budapest, Pf. 16.) for legal remedies, or may also initiate proceedings before the competent court of his or her place of residence or domicile. The contact details of the competent courts can be found at the following link: <https://birosag.hu/birosag-kereso>. Please note that legal representation before the tribunal is mandatory, and you will need to be properly represented to pursue your claims in court.

In the event that our Company or our data processors process the data subject's data in breach of the applicable data protection provisions and any data subject suffers damage in connection with this, they may bring a claim for damages before the competent court, and in the event of non-pecuniary damage, they may claim damages against our Company or our data processors, on the understanding that the data processor is liable for the damage only if it has not complied with the legal provisions on data processing or the instructions of the data controller. The data subject may also, at his or her choice, pursue his or her claim for damages before the courts for the place where our Company or the infringing processor is established or where he or she resides or is domiciled. To help you find the competent court and its contact details, please use the search facility at the following link: <https://birosag.hu/birosag-kereso>.

We explicitly draw the attention of data subjects to the fact that their requests to exercise their data processing rights can only be fulfilled if their identity can be clearly established, in order to avoid unauthorised access to the data. Therefore, we ask data subjects to always include at least their name and e-mail address in their request to our Company, so that we can verify that the request was made by the data subject by comparing it with the data we hold. Our Company reserves the right to request additional personal data from the person submitting the request in order to identify the data subject, provided that this does not result in the processing of data that is not strictly necessary to prevent unauthorised access to the data.

16. Data security measures

We do our utmost to ensure that personal data relating to data subjects is kept at an adequate level of security by our Company. The most appropriate data security measure is therefore selected on a case-by-case basis, taking into account and assessing the existing and likely risks to the data processed.

In order to ensure the secure processing of personal data, we ensure that the electronic records and programs that enable the processing of personal data are kept confidential at all times during the processing, that the electronic records and files containing the data have the necessary protection and are resistant to any unauthorized interference, attack, accidental destruction or loss of data. Our Company guarantees that the records and programs used for data management are available to the extent necessary to carry out the data management operations and to exercise and enforce the rights of data subjects.

The systems and tools used to manage data have been selected to ensure that they are capable and appropriate to ensure access to data in the event of a data breach and to ensure that data can be restored within a reasonable time in the event of loss or destruction. Before any processing operation is initiated and throughout the entire processing period, we continuously monitor and assess the likely risks to which personal data are exposed at any given moment, in particular the risks of accidental or unlawful destruction, alteration, loss or access by unauthorised persons of data recorded, stored or otherwise processed by our Company.

Please be advised that our internal IT systems and networks are protected against computer fraud, espionage, sabotage, vandalism, fire and flood, computer viruses, computer intrusions and denial of service attacks.

17. Handling data protection incidents

Please note that despite the data security measures implemented by our Company, undesirable events may still occur that may compromise the protection and security of the personal data we process (data breaches).

In the event of a data breach at our Company, we will take steps to notify the National Authority for Data Protection and Freedom of Information of the incident without undue delay, but no later than 72 hours from the discovery of the incident, in accordance with the provisions of the GDPR.

We inform data subjects that we may send a data breach notification to them if we have experienced an incident that is likely to pose a high risk to their rights and freedoms. Such high risk includes, in particular, where the incident involves data that is considered sensitive (e.g. sensitive data, information about the data subject's financial situation, data that could be used for identity theft or to make a public statement about the data subject). The notification will describe in detail the nature and consequences of the incident and will also inform data subjects of the measures we have already taken or envisage taking to remedy the consequences and to eliminate any adverse effects.

We require our staff who process data to follow our action plan to detect incidents and resolve their impact as soon as possible. To minimise the possibility of incidents occurring during data processing and to ensure the highest possible level of compliance with the above rules, we have built regular monitoring operations into our internal processes.

We inform data subjects that, in addition to reporting incidents involving personal data, we always keep a record of such incidents and keep separate records, which include a description of the incidents, their classification and impact on data subjects, as well as the measures taken by our Company to eliminate them as soon as possible and to eliminate their undesirable consequences.

18. Amendments to the Privacy Notice

Our Company reserves the right to amend this Privacy Policy unilaterally, without time limitation.

If we make such a change, we will inform all natural persons affected by our processing activities detailed in this notice. We will display a notice of the change on our website and will make our privacy notice containing the changes permanently available on our website, where it can be accessed by data subjects at any time.

23 November 2022.