PRIVACY NOTICE

ROYAL PLAST KFT.

EFFECTIVE DATE:
27.09.2022 UNTIL
REVOKED

1. Details of controller:

Name of company:	Royal Plast Kft.
Registered seat:	H-9027 Győr, Tibormajori u. 22.
Permanent establishments:	H-9027 Győr, Tibormajori u. 22. H-9027 Győr, Tibormajori u. 20. 01145/58 hrsz.
Branch:	H-6000 Kecskemét, Külső-Szegedi út 51.
Company registration number:	08-09-024813
Tax number:	24270393-2-08
Representative:	PÁTI Zoltán Managing Director
Telephone number:	+3620/528 8181
E-mail address:	office@royalplast.hu

2. The purpose of the Privacy Notice:

The controller accepts to be bound by the contents of the legal notice. The purpose of this Privacy Notice is to inform clients and partners on the processing of their personal data.

The controller processes personal data only in accordance with the provisions of applicable regulations, in strict compliance with the provisions of data processing and data protection regulations, in observance of the principles of legality, fair procedure and transparency, purpose limitation, data minimization, accuracy, storage limitation.

The controller shall implement every technical and organizational measure to process the personal data of its partners in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council.

The controller has established its day-to-day activities, prepared its policies, records and sample documents according to the above.

The privacy principles relating to processing carried out by the controller are continuously available at the registered seat and on the website of the controller. The controller maintains the right to amend this policy at any time. It shall inform the interested parties of any change in due time.

The controller is committed to protecting the personal data of its lessees and partners, and attaches high importance to respecting the informational self-determination of its lessees and customers. The controller treats personal data as confidential and implements every security, technical and organizational measure that guarantees the security of the data. Controller's data protection practices are introduced below.

3. The personal, material and temporal scope of the Privacy Notice:

This personal scope of this Privacy Notice shall apply to the controller, the natural persons whose personal data are processed in the data processing operations under this Notice, and also to persons whose rights and legitimate interests are affected by the data processing.

The material scope of the Notice shall apply to every data processing taking place during the activity of the controller, with the exception of the so-called internal processing (e.g. those related to employees) which is regulated in the Privacy Policy of the controller or in a separate Notice.

This Notice shall take effect on the date it is approved and shall remain in effect indefinitely until further notice.

4. Key definitions:

Personal data: means 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.

Sensitive data: any data in the special categories of personal data, i.e., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, personal data concerning health or data concerning a natural person's sex life or sexual orientation.

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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure-transmission, dissemination or otherwise making available, alignment or combination, restriction or destruction.

Controller: means 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 the personal data.

Processor: means a natural or legal person, public authority, agency or other body which processes the personal data on behalf of the controller.

Joint controllers: where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.

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 authorized 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.

Personal data breach: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

5. Legitimate processing by the controller:

Personal data is processed by the controller only in the following cases:

1. if the data subject has given consent to the processing of his or her personal data for one or more specific purposes,
2. processing is necessary for the performance of a contract to which the data subject is party,

3. processing is necessary for compliance with a legal obligation to which the controller is subject,
4. processing is necessary in order to protect the vital interests of the data subject or of another natural person,
5. processing is necessary to pursue legitimate interests of the controller or a third party.

The controller examines the lawfulness of data processing in every phase of its activity, it processes only such data and only to such extent whose purpose or legal basis it can justify. Should conditions for a legal basis terminate, data processing may be continued only if the controller is able to verify the existence of another, adequate legal basis.

Legal basis, as a rule, can only be confirmed in writing, and where legal basis is created by conduct, it is necessary to examine whether legal basis can later be verified unambiguously. In case of doubt, effort must be made to confirm in writing data processing based on conduct, having regard to reasonableness and economic efficiency.

In the case of data processing based on consent, the data subject consents to the processing of his or her personal data. Consent has no formality requirements, but subsequent provability requires consent on paper or in an electronic form.

Data processing on the legal basis of compliance with a legal obligation is independent of the consent of the data subject as it is regulated by legislation.
Irrespective of the nature of processing, the data subject individual must be informed before the start of the processing that processing is mandatory and unavoidable, and the data subject must receive clear and detailed information before the start of the processing on all the major facts concerning the processing of his or her data.

Pursuant to the GDPR (General Data Protection Regulation), processing of personal data is permitted also where processing is related to the performance of a contract to which the private individual data subject is a party, or where data processing or data collection is necessary to take steps at the request of the data subject prior to entering into a contract. The controller may process personal data on the legal basis of performance of a contract with the purpose of entering into, performing or terminating a contract.

6. Pesonal data processing by the controller:

The controller specializes in waste recycling and the trade of raw materials and packaging materials. It also leases machinery and real estate. It may receive the personal data of natural persons when fulfilling these activities. It carries out the following data processing activities:

A. The contracted partners of the controller may include private individuals as well as legal persons. Entering into contract is preceded by a request for quotation either in person, or via telephone or in an e-mail message. The requester submits their name, telephone number, e-mail address where the controller sends its quotation. If the offer is rejected, the personal data of the data subject are deleted without delay, but at least within 30 days. The legal basis of processing in this case is entering into contract (Article 6(1) b) of the General Data Protection Regulation). If the data subject orders the service offered, a contract is executed. When entering into contract, the controller receives further personal data of private individuals (customers, contact persons). The legal basis of processing is the performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), and the consent of the data subject in the case of contact persons of a legal person (Article 6(1) a) of the General Data Protection Regulation). The controller shall issue an invoice or an accounting document for the consideration of the service it renders. The accounting document does not contain personal data. The invoice contains the name, address and in some cases the tax number of the customer. The controller has an obligation to issue invoices mandated by law. The legal basis for processing personal data indicated on the invoice is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

B. The controller accepts orders during the sale of its products in connection with its commercial activity in person, via telephone or e-mail. Customers may include private individuals as well as legal persons. When an order is placed, the name (for legal persons, the name of the contact person), address, e-mail address, telephone number of the customer is collected by the controller. The legal basis for personal data processing is the performance of contractual obligations (Article 6(1) b) of the General Data Protection Regulation). For legal

persons, the personal data of the contact person are processed which is based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation). The purpose of personal data processing is the performance of obligations, communication and delivery of products ordered. The controller shall issue an invoice or an accounting document to its customers for the consideration of the products it sells. The accounting document does not contain personal data. The invoice contains the name, address and in some cases, the tax number of the customer. The legal basis for personal data processing is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

C. The controller also leases machinery and real estate where its contracted partners may include private individuals as well as legal persons. In such cases, processing is related to the personal data indicated in the contracts entered into with lessees. When a contract is entered into, the controller receives the personal data of private individuals (partners and contact persons). The legal basis of processing is the performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), and the consent of the data subject in the case of contact persons of a legal person (Article 6(1) a) of the General Data Protection Regulation). The controller processes the personal data with the purpose of entering into a lease agreement, identification of the lessee, and communication. The controller shall issue an invoice to lessee for the amount of the lease fee. The name, address, in some cases the tax number of the lessee is indicated in the invoice. The controller has an obligation to issue invoices mandated by law. The legal basis for personal data processing is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

D. When fulfilling its tasks, the controller processes the e-mail addresses, telephone number of its clients, lessees, customers for the performance of a contractual obligation (Article 6(1) b) of the General Data Protection Regulation) and on the basis of their individual consent (Article 6(1) a) of the General Data Protection Regulation).

E. During its work, the controller is in a contractual relationship with subcontractors, suppliers and service providers, which may also include the processing of personal data. In this case, the legal basis of processing (for natural persons or sole traders) is the performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), and, where personal data of a contact person of a legal entity is concerned, the informed, explicit consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).

F. Natural persons applying for the controller submit CVs to the company. Processing also takes place in connection with the personal data included in CVs. The legal basis of processing is the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).

G. The controller presents its activity, services and products on its website (www.royalplast.hu). The website uses cookies during its operation which also collect personal data from the visitors. The legal basis of processing is the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).

H. When handling complaints concerning the activity of the controller, the purpose of processing is to allow complaints to be made, to identify data subjects and their complaints, to record the data mandatorily required by law, to examine complaints, and to communicate in connection with the resolving of the complaints.
Where a complaint has been submitted, the processing of personal data is mandatory, pursuant to Act CLV of 1997 on Consumer Protection. In the meaning of this, the legal basis for processing is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation).

The controller shall maintain a data processing register to list the processing events above. The register will also specify the deadlines when personal data must be deleted. The register is attached to this Privacy Notice.

7. Processors in connection with the controller:

Where processing is to be carried out on behalf of the controller, the controller shall use only processors providing sufficient guarantees to implement appropriate

technical and organizational measures in such a manner that processing will meet the requirements of the General Data Protection Regulation ensuring the protection of the rights of the data subject.

The controller hereby declares that during its activity it will only use processors providing sufficient guarantees for their compliance with the provisions of GDPR and implement appropriate technical and organizational measures ensuring the protection of the rights of the data subjects. Relevant declarations by the processors are available.

By becoming familiar with and acknowledging this Privacy Notice, the data subjects accept that the controller will forward their personal data to the processors and joint controllers listed below.

- Processor is a accounting or auditor company hired by the controller:
  Accountant:
    - Royal Plast Kft.
    - H-9027 Győr, Tibormajori u.22.
    - office@royalplast.hu

  Auditor:
    - Franek Könyvvizsgáló, Adótanácsadó és Könyvelő Bt.
    - H-9200 Mosonmagyaróvár, Major Pál u.44.
    - +36 96 216 319

- Controller's partner in connection with invoicing:
    - Royal Plast Kft.
    - H-9027 Győr, Tibormajori u.22.
    - office@royalplast.hu

- The company hosting the controller's website also qualifies as processor:
    - Positive by Hinora Group Kft.
    - H-1062 Budapest, Délibáb utca 29.
    - hinora.balint@hinora.hu

    - Sybell Informatika Kft.
    - H-1158 Budapest, Késmárk utca 7/B 2. em. 206.
    - info@sybell.hu

- The maintainer and system administrator of the controller's website also qualifies as processor:
    - Positive by Hinora Group Kft.
    - H-1062 Budapest, Délibáb utca 29.
    - hinora.balint@hinora.hu

    - Sybell Informatika Kft.
    - H-1158 Budapest, Késmárk utca 7/B 2. em. 206.
    - info@sybell.hu

- As Google Analytics is used on the controller's website, the following is a processor:
    - Google Ireland Limited
    - Gordon House, Barrow Street, Dublin 4, Ireland

- The operator of controller's mailing system is also a processor:
    - Microware Hungary Kft.
    - H-1148, Budapest, Fogarasi út 3-5.
    - domreg@microware.hu

- The controller – for the settlement of EDIOP tenders, for data submissions – transmits data to the following company:
    - OFA Nonprofit Kft.
    - H-1036 Budapest, Lajos u. 80.
    - info@ofa.hu

- The controller also forwards the personal data of its customers to the National Tax and Customs Administration.

Contracted data processing and controlling partners process the personal data of partners exclusively based on the instructions of the controller (except in the case of a legal obligation), undertaking a confidentiality obligation.

8. Processing related to contracts entered into by the controller:

Customer contracts:

The contracted partners of the controller may include private individuals as well as legal persons. Entering into contract is preceded by a request for quotation either in person, or via telephone or in an e-mail message. The requester submits their name, telephone number, e-mail address where the controller sends its quotation. If the offer is rejected, the personal data of the data subject are deleted without delay, but at least within 30 days. The legal basis of processing in this case is entering into contract (Article 6(1) b) of the General Data Protection Regulation). If the data subject orders the service offered, a contract is executed. When entering into contract, the controller receives further personal data of private individuals (customers, contact persons). The legal basis of processing is the performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), and the consent of the data subject in the case of contact persons of a legal person (Article 6(1) a) of the General Data Protection Regulation). The controller shall issue an invoice or an accounting document for the consideration of the service it renders. The accounting document does not contain personal data. The invoice contains the name, address and in some cases the tax number of the customer. The controller has an obligation to issue invoices mandated by law. The legal basis for processing personal data indicated on the invoice is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

The controller accepts orders during the sale of its products in connection with its commercial activity in person, via telephone or e-mail. Customers may include private individuals as well as legal persons. When an order is placed, the name (for legal persons, the name of the contact person), address, e-mail address, telephone number of the customer is collected by the controller. The legal basis for personal data processing is the performance of contractual obligations (Article 6(1) b) of the General Data Protection Regulation). For legal persons, the personal data of the contact person are processed which is based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation). The purpose of personal data processing is the performance of obligations, communication and delivery of products ordered. The controller shall issue an invoice or an accounting document to its customers for the consideration of the products it sells. The accounting document does not contain personal data. The invoice contains the name, address and in some cases, the tax number of the customer. The legal basis for personal data processing is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a

term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

The controller also leases machinery and real estate where its contracted partners may include private individuals as well as legal persons. In such cases, processing is related to the personal data indicated in the contracts entered into with lessees. When a contract is entered into, the controller receives the personal data of private individuals (partners and contact persons). The legal basis of processing is the performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), and the consent of the data subject in the case of contact persons of a legal person (Article 6(1) a) of the General Data Protection Regulation). The controller processes the personal data with the purpose of entering into a lease agreement, identification of the lessee, and communication. The controller shall issue an invoice to lessee for the amount of the lease fee. The name, address, in some cases the tax number of the lessee is indicated in the invoice. The controller has an obligation to issue invoices mandated by law. The legal basis for personal data processing is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

<u>Supplier contracts:</u>

The controller processes the suppliers' contact details (name, e-mail address, telephone number) and is in contact with service providers and subcontractors, too. For the purpose of communication with partners, personal data is processed in such cases, too (personal data of the contact person, or a natural person, or a sole trader). The legal basis of processing personal data is the performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), or the consent of the contact person (Article 6(1) a) of the General Data Protection Regulation).
The controller requires the contact persons of companies to fill out a statement of consent in which they are informed of their rights concerning their personal data and asks them for their consent to processing. In such cases, the legal basis of processing is the explicit, written consent of the data subject that is based on adequate information (Article 6(1) a) of the General Data Protection Regulation). Where a contract with a partner has terminated and the storage obligation mandated by law does not require data and documents to be stored, the telephone numbers and

e-mail addresses will be deleted. The controller shall store the personal data indicated in the contract and on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

9. Processing invoices issued to customers and the personal data they contain:

The controller shall issue an invoice or an accounting document to its customers for the value of the services it renders and the products it sells. The accounting document does not contain personal data. The invoice contains the name, address and in some cases the tax number of the customer. The controller issues the invoice for the purpose of complying with a legal obligation. The legal basis for processing personal data indicated on the invoice is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation). The controller shall store the personal data indicated on the invoice for a term of 8 years, complying with its storage obligation stipulated in Section 169 of the Accounting Act.

10. Data concerning children, processing special categories of personal data:

The controller intends to sell or lease its services, products, machinery and real estate only to persons above the age of 18.

By consenting to the use of cookies on the data controller's website, the data subject declares that they have reached the age of 16. Persons below the age of 16 cannot consent to data collection through the use of cookies on the website, having regard to the fact that, pursuant to Article 8(1) of the General Data Protection Regulation (GDPR), their legal statement consenting to processing shall be lawful only if it is authorized by their legal representative. The controller is not able to verify the age or entitlement of the person providing the consent, therefore, the data subject warrants that the data provided are true.

The controller shall not record sensitive data that is provided or becomes known to them. If data of this nature is entered into any of the systems of the controller without controller's knowledge, the controller will delete such data form its system as soon as it becomes aware of it.

11. Storing e-mail addresses, telephone numbers by the controller:

During its activity, the controller learns the e-mail addresses, telephone numbers of its partners, lessees, customers or clients, too. The personal data entered into its system in such a manner will be processed for the purpose of complying with contractual obligations (Article 6(1) b) of the General Data Protection Regulation). Where a contract with a partner has terminated and the storage obligation mandated by law does not require data and documents to be stored, the telephone numbers and e-mail addresses will be deleted. In some cases, the controller shall have a legitimate interest in storing the data, in such cases it will request the data subject to provide their explicit, written consent to storing their personal data (Article 6(1) a) of the General Data Protection Regulation).

12. Managing applications, CVs received by the controller:

Natural persons applying for the controller submit CVs to the company. If a CV was submitted because the controller is looking to hire an employee and posted an advertisement for the position, the CV can only be used in connection with that position.

If an applicant does not fulfil the criteria for the job posted, and another candidate is selected, the CV will be destroyed without delay. The controller may only store the application based on the data subject's clear and explicit, voluntary consent (Article 6(1) a) of the General Data Protection Regulation) provided that its storage is required to fulfil its data processing purposes.

The data controller does not post 'anonymous" job advertisements (job advertisements in which the employer does not indicate its name and therefore the applicants cannot know at the time of submitting their applications to which employer they are applying) as this is contrary to the principle of providing preliminary information on the identity of the controller. The controller, if it posts a job advertisement, will in every case inform the data subjects of the identity of the controller.

If an applicant has voluntarily submitted a CV to the controller without a job advertisement having been posted, they will be required to make a statement on whether they consent to the processing of personal data by the controller. Submission of a CV does not mean that the data subject has consented to their application being preserved by the controller. It is also important that a CV may only be used by the controller if there are vacancies in the jobs indicated by the applicant. A CV will be

stored for period of 3 months by default, except where the data subject has consented to longer retention.

When assessing job applications, the controller will check or collect information from the applicant's profile page on social sites only if it has informed the data subject of this in advance. In such cases, only such material will be viewed that is set to public and only such information will be considered during the selection process that have relevance to the job application or the position. The controller will not save, store or forward to third parties the profile page of the job applicant under any circumstances.

If a data subject is not selected for a given position, the controller will inform them of this fact and gives reason for the rejection.

13. Controller's website:

The controller presents its activity, services and products to those interested on its website (www.royalplast.hu).

During its operation, the controller's website uses cookies. The legal basis of processing personal data collected by the cookies is the consent of the visitor (Article 6(1) a) of the General Data Protection Regulation).

The www.royalplast.hu website uses the following cookies:

- cookieBox
  - duration: 1 month
  - type: strictly necessary
- XSRF-TOKEN
  - duration: 2 hours
  - type: strictly necessary
- _ga
  - duration: 1 year
  - type: statistical – Google Analytics
- _ga_4289RBZ5G3
  - duration: 1 year
  - type: statistical – Google Analytics
- visitor
  - duration: 8 months
  - type: strictly necessary

- royal_plast_session
    - duration: 2 hours
    - type: other

Cookies:

Cookies do the following:

- collect information on visitors and their devices;
- remember the personal settings of visitors that may be used;
- facilitate the use of the website;
- ensure a high-quality user experience.

To ensure a personalized service, a small data package (a so-called cookie) will be stored on the user's computer that will be retrieved at subsequent visits. If a browser returns a previously saved cookie, the service provider managing the cookie will be able to connect the current visit of the user with their earlier visits, but only in connection with its own content.

Strictly necessary session cookies:

The purpose of these cookies is to ensure that visitors can fully and seamlessly browse the website, use its functions and the services available there. Such cookies expire at the end of each session (browsing), and are automatically deleted from the computer, or another device used for browsing, when the browser has been closed.

The data subject's selection in connection with the cookie:

Web browser cookies:

In the cookie settings of the browser, the data subject may accept or reject new cookies or delete existing cookies. Browsers may also be set to send a notification each time a new cookie is saved on the computer or another device. You can find more information on the management of cookies in the "help" section of your browser.
If a visitor decides to disable some or all of the cookies, they will not be able to use all of the functions of the website.

Third-party cookies (analytics, statistics):

Use of Google Analytics (analytics, statistics):

The controller's website uses Google Analytics as third-party cookies. By using Google Analytics, which is a web analysis, statistical service, the controller obtains information about how visitors use the website. The data collected will be used to develop the website and to improve user experience. These cookies will also remain in the browser of the visitor's computer or another device used for browsing until they expire or until the visitor deletes them.

If websites or applications use the Google Analytics service together with other Google advertisement products – for example, with the Google Ads system – they might collect other advertisement identifiers, too. Users may disable this service, or modify the settings for the use of cookies, in the advertising settings.

Google Analytics collects users' IP address to protect the security of the service and to provide an overview to website owners on which country, state or city their visitors come from (this is also called "IP-based geolocation"). Google Analytics offers an option to mask IP addresses collected, however, website owners can see visitors' IP addresses even when they do not use Google Analytics.

The IP address transmitted by the visitor's browser is not matched in Google Analytics with other Google data. You may prevent cookies from being stored with the appropriate settings of your browser software, but in this case the visitor might not be able to use the functionality of the website to its full extent.

In addition to this, the visitor may prohibit Google from collecting the data generated by the cookies in connection with the visitor's use of the website (IP address included), and from processing such data, if they download and install the browser plugin available at the link below:

Current link: http://www.google.com/policies/privacy/ads/.

Google acts as the processor of Google Analytics and of the controller.

Pursuant to the provisions of the General Data Protection Regulation (GDPR), Google Analytics is the processor because Google Analytics collects and processes data on behalf of its customers (e.g., the controller) based on the instructions of these customers. Google may use the data only in accordance with the terms and conditions of contracts it entered into with Google Analytics customers and based on the settings that customers set on its product interfaces.

Google Analytics collects internal cookies, data about the device/browser, IP addresses, and the activities on the website/in the application. Such data are collected to perform measurements and to create statistical reports about the activities that are performed on websites and/or in applications using the Google

Analytics service. Customers can customize cookies, or the scope of data collected, with functions like cookie settings, User-ID, Data import and Measurement Protocol.
To customers using an SDK for Google Analytics applications, Google provides an application instance identifier. This is a number that the system randomly generates when the used first installs an application.
Google Analytics uses IP addresses to draw conclusions as to the geographical location of visitors, and to protect the service and its customers. The customers may turn on a function called IP-masking, and, when used, Google Analytics will only use a part of the IP address collected instead of the entire IP address. Furthermore, customers may override IP addresses with the IP override function.
Google will use the data managed in the Google Analytics service to provide Google Analytics measurement service to its customers. With the identifiers – such as cookies and application instance identifiers – it measures what operations the users carry out on the websites and/or applications of the clients. IP addresses are used to maintain the security of the service and to give website owners an overview of which part of the world their users come from.

By consenting to the use of cookies on the data controller's website, the data subject declares that they have reached the age of 16. Persons below the age of 16 cannot make representations as to accepting or rejecting the use of cookies on the website, having regard to the fact that, pursuant to Article 8(1) of the General Data Protection Regulation (GDPR), their legal statement consenting to processing shall be lawful only if it is authorized by their legal representative. The controller is not able to verify the age or entitlement of the person providing the consent, therefore, the data subject warrants that the data provided are true.

14. Handling complaints in connection with the activities of the controller:

When handling complaints concerning the activity of the controller, the purpose of processing is to allow complaints to be made, to identify data subjects and their complaints, to record the data mandatorily required by law, to examine complaints, and to communicate in connection with the resolving of the complaints.
Where a complaint has been submitted, the processing of personal data is mandatory, pursuant to Act CLV of 1997 on Consumer Protection. In the meaning of this, the legal basis for processing is compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation).
The controller will retain the protocol of the complaint as well as a copy of the response for a period of 3 years, and will process personal data for the same period.

15. Security of processing:

The controller undertakes to ensure the security of the personal data and shall take the necessary the technical and organizational measures and maintain the procedural rules to ensure the data collected, stored and processed will remain protected, and, at the same time, will prevent the destruction, unlawful access to and unlawful modification of such data. It also undertakes to call upon each third party to whom it forwards or reveals the data to comply with the requirements of data security.

The controller shall ensure that no unauthorized parties shall have access to processed data, and that no unauthorized party can disclose, transmit, modify or delete the processed data. The data processed shall only be accessible to the controller and the processor(s) engaged by it and they shall not be reveal to any third parties who are unauthorized to access the data.

The controller shall exercise extra care to ensure that the personal data of its customers, lessees, clients are secure. It will act in full compliance with statutory regulations and require all of its partners to do the same. The protection of personal data includes physical data protection (storing documents in a lockable room or a lockable cabinet monitored with surveillance cameras and protected by an alarm system) and information technology protection (use of an antivirus program, a firewall, password protection).

The controller will store the personal data submitted by the data subjects primarily on the servers of processor(s) listed herein protected by the usual protection systems, and in part on its own IT devices, and, in the case of paper-based data carriers, at its registered seat, permanent establishments, locked away appropriately.

The data subjects acknowledge and accept that when they have submitted their personal data, their protection and security on the Internet or in a computer system cannot be fully guaranteed. In the event of an unlawful access or disclosure – taking place despite the efforts of the controller – the steps included in this notice must be followed.

16. The rights of the data subjects:

- **Transparent information:**

This Privacy Notice also aims to provide clear, succinct, transparent and understandable information about the processing activity taking place at the controller.

- **Right to access:**
  The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

  - purpose of processing,
  - the categories of personal data concerned,
  - recipients to whom personal data was disclosed,
  - planned storage period of personal data.

  You may request to obtain information on the above data from the controller at the address, e-mail address below:
  Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
  E-mail: office@royalplast.hu

  Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

- **Right to rectification:**
  The data subject shall have the right to obtain from the controller the rectification of inaccurate personal data concerning him or her.

  You may request to obtain information on the above data from the controller at the address, e-mail address below:
  Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
  E-mail: office@royalplast.hu

  Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

- **Right to rectification:**

The data subject shall have the right to obtain from the controller the erase personal data concerning him or her. The controller – based on this request – must delete the personal data if any of the following reasons exists:

- personal data are no longer necessary in relation to the purposes for which they were collected,
- the data subject withdraws his or her consent and there is no other legal ground for the processing,
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing,
- the personal data have been unlawfully processed,
- the personal data have to be erased for compliance with a legal obligation in Union or Member State.

You may request to obtain information on the above data from the controller at the address, e-mail address below:
Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
E-mail: office@royalplast.hu

Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

- **Right to restriction of processing:**
  The data subject has the right to request from the controller the restriction of processing primarily if:

  - he or she disputes the accuracy of the data,
  - finds processing unlawful, but, for some reason, does not request the deletion of the data.

  You may request to obtain information on the above data from the controller at the address, e-mail address below:
  Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
  E-mail: office@royalplast.hu

Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

- **Right to data portability:**
  The data subject shall have the right to receive the personal data concerning him or her, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

  You may request to obtain information on the above data from the controller at the address, e-mail address below:
  Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
  E-mail: office@royalplast.hu

  Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

- **Right to object:**
  The data subject shall have the right to object to the processing of his or her personal data on grounds relating to his or her particular situation in the manner stipulated in Article 21 of Regulation (EU) 2016/679 of the European Parliament and of the Council.

  You may request to obtain information on the above data from the controller at the address, e-mail address below:
  Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
  E-mail: office@royalplast.hu

  Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

- **The right of the data subject in the case of automated decision-making:**
  The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her. Automated decision-making means any procedure or methodology during which a

technical automatism assesses the personal characteristics of a data subject and which produces legal effects concerning him or her or similarly affects him or her. The controller does not apply information technology solutions suitable for profiling that may significantly affect the rights of the data subject.

You may request to obtain information on the above data from the controller at the address, e-mail address below:
Royal Plast Kft. H-9027 Győr, Tibormajori u. 22.
E-mail: office@royalplast.hu

Controller hereby informs you that replies to inquiries will be provided within 30 days. Inquiries submitted by post will be answered via post, inquiries submitted via e-mail will be answered via e-mail.

The controller undertakes to inform every recipient to whom personal data were communicated about requests it has received in connection with the above rights, except where this proves impossible. It also undertakes to notify data subjects within 30 (thirty) days about the resolution of the above requests and about the decisions related to them.

17. Personal data breach:

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

In the case of a personal data breach, data protection shall be breached at a magnitude that poses a serious threat that will lead to the personal data being:

- destroyed,
- lost,
- altered,
- unlawfully disclosed, or
- unlawfully accessed.

Any of the above shall mean a personal data breach but this does not mean that two or more points cannot occur at the same time. This does not only include deliberate,

malicious acts, but also damage caused by negligence. A personal data breach, therefore, occurs when it is caused by an accidental or unlawful act.

The following shall constitute a personal data breach:

- unlawfully forwarding personal data in documents, on portable devices, data carriers or information systems (e.g., via e-mail),
- unauthorized access to an IT system or application in which personal data are processed,
- damage to or loss of a part or the entirety of a database containing personal data,
- a part or the entirety of an IT system being rendered useless due to a virus or another malicious code, etc.

A personal data breach may, if not addressed in an appropriate and timely manner, result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorized reversal of pseudonymization, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the natural person concerned.

Should a personal data breach occur, the controller will report the personal data breach to the National Authority for Data Protection and Freedom of Information without delay (except if the personal data breach will likely not result in a risk to the rights and freedoms of natural persons). When the controller becomes aware of a personal data breach, it shall report it without undue delay and, where feasible, not later than 72 hours after having become aware of it. Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification and information must be provided in phases without undue further delay.

The National Authority for Data Protection and Freedom of Information maintains a system on its website especially created to report personal data breaches, where such breaches can be reported via electronic means.

The controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. The controller shall maintain a database of the data breaches, including the causes, events

and the scope of personal data affected. In addition to this, the database must contain the impacts and consequences of the data breaches as well as measures taken to remedy them and the conclusions of the controller (e.g.: why the controller believes it is not reportable, or if the report is made with a delay, what caused the delay).

It is not necessary to report data breaches to the supervisory authority where they will likely not result in a risk to the rights and freedoms of the natural persons.

When the personal data breach is likely to result in a high risk to the rights and freedoms of the partners, lessees, customers of the controller, the controller will communicate the personal data breach without delay to the partner concerned. The communication to the data subject shall describe in clear and plain language the nature of the personal data breach and contain at least the most important information and measures.

The communication to the data subject shall not be required if any of the following conditions are met:

- the controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access it;
- the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialize;
- it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

18. Information on applicable legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR);
- Act CXII of 2011 - on Right of Informational Self-Determination and on Freedom of Information (“Information Act”);
- Act V of 2013 – on the Civil Code (“Civil Code”);

- Act C of 2000 – on Accounting ("Accounting Act").

19. Access to courts:

Data subjects may turn to the court if his or her rights are infringed. The court will act with priority in such cases.

20. Procedure by the data protection authority:

You may lodge a complaint with the National Authority for Data Protection and Freedom of Information:

Name: **National Authority for Data Protection and Freedom of Information**
Registered seat: **H-1055 Budapest, Falk Miksa u. 9-11.**
Postal address: **H-1363 Budapest, Pf. 9.**
Telephone: **0613911400**
Fax: **0613911410**
E-mail: **ugyfelszolgalat@naih.hu**
Website: **http://www.naih.hu**

21. Miscellaneous provisions:

On processing not listed herein, the controller will provide information when the data is collected. In such cases, the provisions of applicable legislation will apply.

The controller hereby informs its customers that the court, the prosecution service, the investigative authority, the infraction authority, the public administration authority, the National Authority for Data Protection and Freedom of Information, the Central Bank of Hungary, or another authority mandated by legislation may request the controller to provide information, to reveal or disclose data, to make available documents. The controller will disclose personal data to the authorities – if the authority designated the exact purpose and the scope of the data – only to the extent and in the amount that is strictly necessary to achieve the purposes of the request.

The website of the National Authority for Data Protection contains further information about the privacy rights referenced in this Privacy Notice.

Győr, 22.09. 2022.

PÁTI Zoltán
Managing Director

1. ANNEX NO.

Serial No.	Name of personal data processing	Purpose of processing	Legal basis of processing	Deadline to delete personal data
1.	In the case of a request for quotation, the personal data of the natural person or sole trader (name, e-mail address, telephone number).	For giving a quote and for communication.	Entering into contract (Article 6(1) b) of the General Data Protection Regulation).	If the offer is not accepted, it will be deleted without delay, but at least within 30 days.
2.	When requesting a quotation, the personal data of the contact person of the legal person (name, e-mail address, telephone number).	For giving a quote and for communication.	The consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Without delay if the consent is withdrawn. If the offer is not accepted, it will be deleted without delay, but at least within 30 days.
3.	The personal data indicated in the contract in the case of a natural person, sole trader (name, address, e-mail address, telephone number).	Performance of a contract.	The performance of a contractual obligation (Article 6(1) b) of the General Data Protection Regulation), then compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation).	Within 30 days of the expiry of the retention period prescribed by law (8 years).
4.	In a contract entered into with a legal person, the personal data of the contact person (name, e-mail address, telephone number).	Performance of a contract, communication.	Based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Without delay if the consent is withdrawn. Within 30 days of the termination of the contract, except where legislation stipulates a retention obligation concerning contracts (within 30 days of the expiry of the obligation).

5.	Personal data submitted during the purchase.	For the performance of a contract, communication.	Performance of a contract (Article 6(1) b) of the General Data Protection Regulation).	Within 30 days of the expiry of the retention period prescribed by law (8 years).
6.	During the purchase, the personal data of the contact person of the legal person.	To comply with a contractual obligation.	Based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Without delay if the consent is withdrawn. Within 30 days of the termination of the contract, except where legislation stipulates a retention obligation concerning contracts (within 30 days of the expiry of the obligation).
7.	The personal data indicated in the lease contract in the case of a natural person, sole trader.	Performance of a contract, communication.	The performance of a contractual obligation (Article 6(1) b) of the General Data Protection Regulation), then compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation).	Within 30 days of the expiry of the retention period prescribed by law (8 years).
8.	In a lease contract entered into with a legal person, the personal data of the contact person (name, e-mail address, telephone number).	Performance of a contract, communication.	Based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Without delay if the consent is withdrawn. Within 30 days of the termination of the contract, except where legislation stipulates a retention obligation concerning contracts (within 30 days of the expiry of the obligation).

9.	The personal data on an invoice issued to the users of the service, customers, lessees (in the case of natural persons or sole traders).	Performance of an obligation mandated by legislation, issuing an invoice.	Compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation).	Within 30 days of the expiry of the retention period prescribed by law (8 years).
10.	Processing related to incoming e-mails (senders' e-mail addresses), telephone numbers.	To comply with a contractual obligation, or based on consent.	The performance of an obligation accepted in a contract (Article 6(1) b) of the General Data Protection Regulation), or the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Within 30 days of the completion of the task, or immediately after the withdrawal of the consent, but not later than within 30 days.
11.	The personal data of suppliers, service providers, subcontractors (in the case of natural persons or sole traders).	To comply with a contractual obligation.	Performance of a contractual obligation (Article 6(1) b) of the General Data Protection Regulation).	Within 30 days of the expiry of the retention period prescribed by law (8 years).
12.	The personal data of contact persons of delivery companies, service providers, subcontractors.	To comply with a contractual obligation.	Based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Without delay if the consent is withdrawn. Within 30 days of the termination of the contract, except where legislation stipulates a retention obligation concerning contracts (within 30 days of the expiry of the obligation).

13.	The personal data in the CV of job applicants.	To fill an advertised position, or to be used in case of a subsequent vacancy. To find the employee with the suitable qualities.	The consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	In the case of an advertised position, the CVs of unsuccessful applicants are deleted by the controller immediately. The data subject's CV submitted voluntarily is stored with the data subject's consent, until the deadline indicated therein.
14.	The personal data obtained with the data collection of the cookies managed by the website.	To improve user experience, to develop the website, statistical purposes.	Based on the consent of the data subject (Article 6(1) a) of the General Data Protection Regulation).	Immediately after the withdrawal of the consent, but not later than within 30 days.
15.	The personal data obtained during the handling of the complaint.	To identify and resolve a complaint.	Compliance with a legal obligation (Article 6(1) c) of the General Data Protection Regulation).	Within 30 days of the expiry of the retention period prescribed by law (3 years).