

Privacy Policy Notice

In this information notice, we publish our terms and conditions for potential data subjects outside of customer relationship, for the management and processing of data related to the use of our website, our career and customer portal, our marketing activities and events, the operation of our customer service, access to our public premises, and data processing related to contact data of our contractual partners. The data processing conditions for our customers are set out in our GTC. The conditions of possible ad hoc data processing not included in the present document and the GTC are provided in the notice relating to the given data processing.

1) INFORMATION RELATED TO INVITECH

Data Controller: **Invitech ICT Services Kft.** (hereinafter referred to as: **Invitech**)

Registered office: 1013 Budapest, Krisztina krt. 39., Hungary

Tax Registration Number: 25836965-2-44

Company registration number: Cg. 01-09-414291

Customer service email address: vip@invitech.hu

Customer Service, Phone: +36 1 884 4242

Mailing address: 2041 Budaörs, Pf. 1444., Hungary

The GTC is available for consultation at: <https://www.invitech.hu/general-terms-and-conditions>

Data Controller: **InviTechnocom Kft.** (A subsidiary of Invitech, hereinafter referred to as: **InviTechnocom**)

Registered office: 1013 Budapest, Krisztina krt. 39., Hungary

Tax Registration Number: 12702400-2-41

Company registration number: Cg. 01-09-414628

Customer service email address: itc_ugyfelszolgalat@invitech.hu

Customer Service, Phone: +36 84 505 888

Mailing address: 8601 Siófok, Pf. 182., Hungary

The GTC is available for consultation at: <https://www.invitech.hu/altalanos-szerzodesi-feltetelek-invitechnocom>
(only in Hungarian language)

(Invitech and InviTechnocom are hereinafter referred to jointly as **we/us** or **Invitech**)

2) OUR DATA PROCESSING (OUTSIDE OF CUSTOMER RELATIONSHIP)

2.1 Data processing related to our website: The homepage of our website can be visited by anyone. On our website, we use plug-ins (cookies) to collect information about our visitors' preferences: We strive to ensure that our commercial campaigns and commercial offers meet the actual interests of our customers. To this end, we collect information about your visit to the website and your session there, as well as about your visit to other websites. We analyse the data collected in this way and draw conclusions about the usage habits and interests of the website visitors, among whom there may be identified registered users. The purpose of this is to predict the interests and preferences of our customers and to develop our products and services in a way that best meets our customers' expectations. For more information about the cookies we use, please click on the pop-up window and the requested privacy settings can be made in the same location.

2.2 Customer Portal: The login and registration page of our customer portal can be accessed via our website. Existing customers have the possibility to register on the customer portal. The customer portal provides the opportunity to view, download bills and the contracts, check payments, accept individual offers, to track ongoing installations, make fault reports, get information about Invitech maintenance times, modify pre-specified data, and request an itemised call list. During registration, the following data must be provided: username, password, name of the customer company/institution, tax number, current account number relevant to the contract, name, position, mobile phone and email address of the contact person. The data will be managed and processed until

the withdrawal of the consent of the customer or for a maximum of **1 year** after the registration becomes inactive. The data protection conditions for our customers are contained in our GTC in any other respects.

2.3 Career Portal: The login or registration page of our career portal is accessible via the website. The processing of personal data provided on the career portal is governed by a data protection notice which is available during the registration process and is mandatory to be accepted in order to finalize the registration.

2.4 Marketing activities: Invitech also carries out direct marketing and newsletter sending to inform you about offers, promotions, subscriber promotions, news, educational content about its services, and to draw your attention to our blog posts. On the list of contacts on which these are based, we manage the data on the name, e-mail address, phone number and position of the persons entrusted with the contact keeping, represented company, and we store the data relevant to the channels through which the contact person allows or prohibits to be contacted for newsletter and direct marketing purposes.

Sources of the contact list are:

- The customer's contact details provided at the time of conclusion of the contract. It is our customers' responsibility to have the appropriate legal title for the transfer of contact data of the data subjects concerned.
- At events organized by Invitech itself, or when Invitech appears as an exhibitor at events organized by others, it also collects data about the visitors based on their voluntary data provision, in the same categories of data as above.
- In addition, Invitech purchases company contact data databases from such third parties only that guarantee the legality of the collection of data and its usability for Invitech's purposes.

The management and processing of personal data takes place within the scope provided for in the GDPR and is typically based on the legitimate interest of Invitech or, where the direct nature of the contact has allowed it, on the direct voluntary consent of the data subject, subject to the guarantees undertaken in this Notice. The duration of the data processing is the duration of the sustenance of the business activity of Invitech in the context of the collection of data, provided that any data subject may request his/her removal from the list or a restriction of the modes of contact keeping at any time, and Invitech conducts data cleansing campaigns from time to time, by means of sending a request to the contact details provided.

2.5 Customer Service: In case of contact with our customer service by phone, we process the name, company represented, position, phone number, e-mail address data, we also make audio recording for quality control of the performance of our customer service colleagues. In addition, in the case of a complaint, we will draw up a report and record the following data: name, represented company, position, place and time of complaint, method, subject matter and content; unique identification number of the complaint. In the event of a fault report, we process the following data: the Customer's name; notification address or other identifier; description of the fault phenomenon; date of the fault report; measures taken to delimit the cause of the fault and their results; cause of the error; method, time and result of the fault repair; method and time of notifying the Customer. The purpose of data processing is to document the identity of the customer, the exact time and the content of the complaint and the information we provide about the complaint for the purpose of handling and retrieving complaints. We will allow the data subject to listen again to the voice recording of the phone conversation made by the customer service office – upon request, within the time for retention of the data, **within 30 days** from the date of notification of the request, in the customer service premises provided by Invitech, and we will provide a copy of the recording **within 30 days**. Legal title for making the audio recording is provided by Article 6 (1)(a) and (c) of the GDPR, Section 141 of Act C of 2003 on Electronic Communications (Eht.) and Section 4 of NMHH Decree 22/2020 (21 December 2020) (Eszr.). The minutes of the oral complaint, the written complaint and the response given to it will be retained **for 5 (five) years**, while pursuant to Section 141 of the Eht. and Section 4 (5) of the Eszr. we are obliged to retain the audio recording **for 1 year**.

2.6 Entry into our public premises: In some of Invitech's offices and data centres, the public customer premises are monitored by camera in order to protect assets, maintain personal security, maintain the audited information security compliance level, and meet facility security commitments made to the customers, which are further described in the on-site camera surveillance information notice relevant to the given facility. After entering the

customer area, if the visitor wishes to enter additional rooms as a guest, the reception service may request the presentation of a photo ID document in order to identify the person entering the premises, as well as to take note of the name of the visitor, the date and time of the visit (exit/entry), the company represented and the purpose of the visit and/or the name of the person visited. These records are stored **for 30 days**.

2.7 Contact details of our contractual partners: In order to establish, manage the contractual relationship, perform and settle accounts for the contract, Invitech manages the personal data of the persons involved in the contractual process, provided by the partners (suppliers) being in contractual relationship with Invitech regarding the delivery of materials, equipment, other goods, design, construction, or the provision of advisory or other services or any other activity, namely data such as: name, company represented, position, email address and phone number. It is the responsibility of our contractual partners to have the appropriate legal title for the transfer of the personal data for the purposes of contact keeping.

2.8 Ethical and legal compliance investigations: Invitech has set itself high ethical standards in accordance with current national and European legislation, under which we have put in place policies requiring ethical business conduct, non-discriminatory treatment, while prohibiting corruption, money laundering, terrorist financing and the use of forced and child labour and similar socially harmful and pursuable behaviours that apply to our employees and suppliers. In the event of a suspected breach of law and the policies, the person injured in the exercise of his/her rights may notify us in the manner and under the terms of the specific notice available on our website. An ethical investigation will be initiated in the event of a complaint for violation of such ethical standards detected within our company or if such a suspicion arises. In the course of the investigation, we manage and process the data of the person making the complaint and other persons affected by the complaint, to the extent that they have made them known to us. The rules on data processing in connection with the investigation and the protection of the notifier are set out in the specific notice referred to above.

2.9 Cooperation within the Group of companies: Invitech has been a member of the 4iG Nyrt. Group since 2021. We strive to provide our customers with the best services within the Group of companies and to make the most favourable business opportunities available for them. To this end, we may share our customers' contracts and contact information with the sales organization of other companies within the Group, in the above legitimate interest. Similarly, it is in the legitimate interest of the Group to allow the management of the group to plan our legal relations with our supplier partners, so contracts and contact data may also be shared in the case of supplier contracts. The legal basis for the processing of data by the recipient companies is a legitimate interest, in case of any objection to the processing of data, you may contact us or the recipient companies alike.

3) DATA PROCESSING

If any of our suppliers' services is directed to or involve data processing activities, Invitech and the Supplier shall be obliged to regulate the conditions for data processing in accordance with the GDPR in the context of the contractual relationship. Unless otherwise agreed by the parties, this means making reference to and applying the "Data Processing Code" in the contractual relationship, which can also be accessed as a separate document on our website. Invitech undertakes to involve only such third parties in data processing activities that are committed to Invitech to comply with the confidentiality, information security and other prescribed requirements and conditions governing for data processors.

4) DATA TRANSMISSION

In the following cases, Invitech will transfer the personal data processed by it to another data controller:

- the contact data provided during an inquiry is provided to the member companies of the 4iG-led Group for the purpose of making an offer, technical implementation planning and management of business operations. (Data controllers within the 4iG group of companies, are specifically but not exclusively: 4iG Zrt., "ANTENNA HUNGARIA" Zrt., Vodafone Hungary zrt., Digi Távközlési és Szolgáltató Kft., InviTechnocom Kft.)
- contact data provided by customers in connection with number portability to another communications service provider (Section 150 of Eht.)

- the contact details provided by customers or other contractual partners in the event of a debt collection are provided to a factor organization, to the organization, consultant or bailiff involved in the settlement of the dispute (pursuant to Section 157 (9) of the Eht. and GDPR based on legitimate interest, subject to consideration of interests)
- data included in the marketing contact list in case of transfer of the business unit involved in the provision of the services (based on legitimate interest under the GDPR, subject to interest consideration)
- contact data provided by customers and data generated by Invitech relating to end-user communications traffic of the customers for law enforcement, national security and national defence purposes (Section 159/A of the Eht.).
- to an expert, consultant or authority involved in any ethical, license- or other legal compliance-related internal or external investigation that may be ongoing at Invitech or in the legal, financial and technical due diligence of Invitech (based on legitimate interest under the GDPR, subject to interest consideration and confidentiality obligation)

5) DATA SECURITY

Invitech has implemented a number of technical and organizational measures to protect personal data and has established procedural rules to ensure that the collected, stored and processed data are protected and prevent their destruction, unauthorized use and unauthorized alteration. We also enforce the data security requirements toward our contractual partners involved in the processing of personal data.

Invitech ensures that the data processed cannot be accessed, disclosed, transmitted or modified or deleted by unauthorized persons. The data processed can only be known by Invitech, its employees or the Data Processor used by it, and will not be passed on by Invitech to a third party without the right to know the data.

Invitech will do everything in its power to ensure that the data is not accidentally damaged or destroyed. Invitech requires its employees involved in the processing activity to observe the above commitment.

Under no circumstances does Invitech collect any special data, that is, data that refer to racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and genetic and biometric data for the purpose of specifically identifying natural persons, health data and personal data relating to the sexual life or sexual orientation of natural persons.

Invitech takes technical and organizational measures to ensure the security of the service and the protection of subscriber personal data managed and processed in the provision of electronic communications services. The security of the service also includes the security of the data processing related to the service.

6) MANAGEMENT AND REPORTING OF DATA PROTECTION INCIDENTS

Personal data breach means any event that results in unlawful management or processing of personal data in relation to personal data managed, transmitted, stored or processed by Invitech, including in particular unauthorized or accidental access, alteration, disclosure, deletion, loss or destruction, or results in accidental destruction and damage to it.

Invitech is obliged to notify the National Authority for Data Protection and Freedom of Information of the personal data breach without undue delay, but no later **than 72 hours** after the data breach has become known to it, unless Invitech can demonstrate that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification cannot be made **within 72 hours**, it shall indicate the reason for the delay and the required information may also be provided in portions without further undue delay.

If the personal data breach is likely to result in a high risk, Invitech will inform the data subjects about the personal data breach via the Invitech website **within 72 hours** of the detection of the personal data breach.

If you have found that your personal data or that of any other person being in relation with Invitech has been

unlawfully altered or destroyed, disclosed to others unlawfully, accessed by others or made public unlawfully, please report this as a data protection incident to Invitech (by giving your contact details, the time, location and other relevant circumstances) to GDPRincidens@invitech.hu.

7.) RIGHTS OF THE DATA SUBJECTS

7.1 Right to access (right to information): At the request of the data subject, Invitech shall provide information free of charge (in electronic or printed form as requested by the data subject) **within 1 month** about whether or not Invitech processes personal data and, if so, access to the personal data and inform him/her of the following information:

- the purpose of the data processing;
- the categories of personal data concerned;
- in case of data transfer, the legal basis for the processing of personal data and the identity of the recipient;
- planned duration of the data processing;
- the rights of the data subject in relation to the rectification, erasure and restriction of processing of personal data and objection to the processing of personal data;
- the possibility of recourse to the Authority;
- the source of the data;
- the name, address and activities of the data processors related to data processing.

The way to do this may be to present the appropriate line of the data protection register and the relevant database.

7.2 Right to rectification: The data subject shall have the right to obtain from Invitech the rectification or supplementation of inaccurate personal data concerning him or her, by certifying his/her identity, if necessary. The rectification shall be carried out without undue delay in the relevant register and shall be notified in writing to the data subject. Furthermore, any recipient to whom the personal data have been disclosed shall be informed of the rectification or erasure of the personal data, unless this proves to be impossible or involves disproportionate effort.

7.3 Right to erasure (right to be forgotten): The data subject has the right to obtain from Invitech the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they had been collected or otherwise processed;
- the data subject withdraws his/her consent and there is no other legal ground for the processing;
- the data subject objects to the processing of his/her personal data;
- the personal data were unlawfully processed by the Data Controller;
- the personal data must be erased for compliance with a legal obligation in union or member state law to which the controller is subject;
- the personal data have been collected on the basis of consent in relation to the offer of information society services intended for children.

The personal data shall not be deleted if the processing is necessary:

- for exercising the right of freedom of expression and information;
- to comply with a legal obligation under union or member state law which requires processing of the personal data;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims (e.g. the data are required in court proceedings for use as evidence).

7.4 Right to restriction of processing Each data subject shall have the right to obtain from the data controller restriction of data processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject. In this case, the restriction shall continue as long as Invitech can verify this;
- the data processing is unlawful, and the data subject is against the erasure of the data, s/he'd rather request the restriction of their use;
- Invitech no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject objects to the processing. In such a case the restriction will concern the period pending the verification whether the legitimate grounds of Invitech override those of the data subject.

Where processing has been restricted in accordance with the above, such personal data may only be processed, with the exception of storage, for the following purposes or on the basis of the following legal grounds only:

- with the data subject's consent,
- for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person,
- for reasons of important public interest of the European Union or of a Member State.

The data controller is obliged to inform in advance the data subject upon whose request the data processing has been restricted about the lifting of the restriction of the data processing, Furthermore, any recipient to whom the personal data have been disclosed shall be informed of the restriction of processing unless this proves impossible or involves disproportionate effort.

7.5 Right to object The data subject may object to the processing of his or her personal data if the processing

- is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Invitech;
- is necessary for the purposes of enforcing the legitimate interests pursued by Invitech as a data controller or by a third party; or
- is based on profiling.

Where personal data are processed for direct marketing purposes or related profiling, the data subject has the right to object at any time to processing of personal data concerning him or her for such purposes. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for these purposes. The data subject has the right to object at any time, on grounds relating to his/her particular situation, to the processing of personal data concerning him/her, which is based on a legitimate interest, including profiling. In such a case Invitech may no longer process the personal data unless Invitech demonstrates compelling legitimate grounds on his side for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. The right to object referred to above shall be explicitly brought to the attention of the data subject at the latest at the first contact and the relevant information shall be displayed clearly and separately from all other information.

It is important that the data subject does not have the right to object in case the data processing is based on:

- consent,
- performance of a contract,
- compliance with a legal obligation and
- on protection of a vital interest.

8) ENFORCEMENT OPTIONS

8.1 If you are a customer, please seek to find answers to your questions primarily in the GTC available on our website, and our general personal data management policy is also available on request for those who are in contact with our company.

8.2 You can also contact our Data Protection Officer with your data protection questions or complaints at the following contact details:

Address: 1013 Budapest, Krisztina krt. 39., Hungary
email: dpo@invitech.hu

8.3 If you have not received an appropriate remedy from us as a data subject, you may appeal to the following bodies:

- National Authority for Data Protection and Freedom of Information
registered office: 1055 Budapest, Falk Miksa utca 9-11., Hungary
mailing address: 1363 Budapest, POB 9.
email: ugyfelszolgalat@naih.hu
website: www.naih.hu
- the court of justice competent for your place of domicile or habitual residence

8.4 In addition, you can contact the National Media and Infocommunications Authority regarding advertisements sent by electronic means:

registered office: 1015 Budapest, Ostrom u. 23-25., Hungary
phone: +36 1 457 7100
email: info@nmhh.hu
website: www.nmhh.hu

9) OTHER PROVISIONS

This Notice is governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and 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 (GDPR) and by those of Act CXII of 2011 on the Right to Informational Self-determination and Freedom of Information, and Act C of 2003 on Electronic Communications (Eht.).

Invitech ICT Services Kft.
InviTechnocom Kft.