

Privacy Notice

In this notice, we provide information on the data processing activities carried out by Invitech ICT Services Ltd. in accordance with Articles 13-14 of the General Data Protection Regulation of the European Union (hereinafter referred to as "GDPR").

1.) DATA OF THE CONTROLLER

Data Controller: **Invitech ICT Services Ltd.** (hereinafter referred to as: **Invitech** or **we**)

Seat: 1013 Budapest, Krisztina krt. 39., Hungary

Customer service e-mail address: vip@invitech.hu

Customer service phone number: 06 80 82 00 82, from abroad: +36 1 884 4242

Mailing address: 2041 Budaörs, POB 1444, Hungary

Data Protection Officer: **ARB Privacy Ltd.**

E-mail address: dpo@invitech.hu

Mailing address: 2041 Budaörs, POB 1444, Hungary

2.) RULES ON THE EXERCISE OF RIGHTS OF DATA SUBJECTS

How can data subjects exercise their rights in relation to data processing?

Data subjects may exercise their rights under the GDPR at any time by submitting a request, orally, in writing or electronically, to Invitech or by contacting the Data Protection Officer at one of the previous contact details.

What does the right of access entitle to?

The data subject has the right to request confirmation at any time that Invitech is processing his or her personal data. The data subject shall have the right and the opportunity to know at any time what data Invitech holds about him/her and under what circumstances and may also request a copy of his/her personal data. A copy of the personal data may be made available to the data subject in a commonly used computer-readable format (PDF/XML) or in a hard copy. A copy can be requested free of charge.

What are the specific rules for accessing voice recordings?

The data subject shall have the right to access a voice recording of his/her conversation with Invitech's customer service. Invitech is obliged to provide a copy of the voice recording within 30 days upon request of the data subject, and the provider will also provide a playback of the voice recording on request at its customer service. The copy shall be provided to the data subject free of charge once per notification. Any further copies of the conversation will be provided only after payment of a fee. The voice recording should be made available in a widely used format that ensures access to the data.

What is the correction of personal data?

The data subject may request the rectification of inaccurate personal data concerning him or her or the completion of incomplete personal data. As long as the data cannot be clarified or supplemented - in the absence of additional information - Invitech shall restrict the processing of the personal data concerned, temporarily suspend the operations performed on them, with the exception of storage. The exercise of the right of rectification in relation to the photographs attached to the notification shall not result in the distortion of the data contained in the photograph or in the processing of data which are not accurate.

When can the right to erasure be exercised?

The data subject may request the deletion of personal data concerning him or her if Invitech no longer needs them or if the data subject has concerns about the lawfulness of the processing of his or her data. If there is an obligation to delete the personal data processed, Invitech will cease to process the data and will delete/anonymize them.

What is the right of restricting the processing?

The data subject may request the restriction of the processing of personal data concerning him or her if he or she is concerned about the lawfulness of the processing and requests the blocking of the data instead of their erasure, or if Invitech no longer needs the data but the data subject requires them for the establishment, exercise or defence of legal claims. Furthermore, if the data subject has objected to the processing, the restriction will apply for the period until it is established whether our legitimate grounds prevail over the data subject's legitimate grounds. During the restriction period, Invitech will not perform any operations on the personal data, except storage. Unblocking may only take place in exceptional cases, as defined in the GDPR, and Invitech will inform the data subject in advance.

How can the right to object be enforced?

The data subject may object if the processing of his or her personal data is based on our legitimate interest [Article 6(1)(f) GDPR]. In this case, the request shall state the reason for the exercise of the right in relation to his or her situation. On the basis of the data thus provided, Invitech will examine, in a documented manner, whether there are legitimate grounds, including the interest in the establishment, exercise or defence of legal claims, which override the interests, rights and freedoms of the data subject. If no such ground exists, Invitech will cease processing and the personal data processed until then will be deleted/anonymized. Otherwise, the processing will continue.

What does it mean to withdraw consent?

The data subject may withdraw his or her consent to the processing of personal data at any time without giving reasons. The withdrawal does not affect the lawfulness of the processing based on consent prior to the withdrawal, but Invitech will no longer carry out operations using the personal data concerned and will delete/anonymize them.

How can rights be exercised after the death of the data subject?

Within **5 years** after the death of the data subject, the rights of access, rectification, erasure, restriction of processing or objection may be exercised by the person whom the data subject has authorised by administrative order or by a declaration made in a public/private document with full probative value made at Invitech. In the absence of a statement, the rights of rectification and objection and, if the processing was unlawful during the lifetime of the data subject or the purpose of the processing ceased to exist upon the death of the data subject, the rights of erasure and restriction of processing may also be exercised by the close relatives (spouse, direct relative / adopted/ step- / foster child, adoptive / step- / foster parent, sibling) of the data subject.

The person asserting the rights must prove the fact and date of the death of the person concerned by means of a death certificate or a court order, and his or her identity, and where applicable his or her status as a close relative, by means of a public document. Thereafter, that person shall have the rights and obligations established for him or her.

3.) REMEDIES

If Invitech has processed the personal data of data subjects in a way that is incompatible with the applicable legislation, or if it has not complied with a request to exercise the right or has done so in an inadequate manner,

the data subject has the right to lodge a complaint with the data protection supervisory authority using the following contact details:

Name: **National Authority for Data Protection and Freedom of Information (NAIH)**

Seat: 1055 Budapest, Falk Miksa utca 9-11., Hungary

Postal address: 1363 Budapest, POB 9., Hungary

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

Phone: +36 30 683 5969, +36 30 549 6838, +36 1 391 1400

Fax: +36 1 391 1410

4.) DATA PROCESSING IN RELATION TO CUSTOMERS

We carry out the following data management activities in relation to our customers.

What data are processed in connection with the conclusion of a contract?

Invitech provides its services on the basis of service contracts concluded with its customers. For the purpose of concluding a service contract, the person acting on behalf of the legal person must provide a specimen signature to prove his / her right to represent and sign. The data obtained in this way is kept by Invitech together with the service contract. The processing is based on our legitimate interest in the conclusion and performance of the service contract [Article 6(1)(f) GDPR]. The data processed in this way will be processed and stored for **1 year** after the termination of the subscriber contract in the case of electronic communications services [retention period pursuant to Article 154(3) of Act C of 2003 on Electronic Communications (hereinafter: **Eht.**), and for other services for **5 years** after the termination of the service contract [limitation period pursuant to Article 6:22(1) of Act V of 2013 on the Civil Code (hereinafter: **Ptk.**)].

How do we contact our customers?

During the content of the service contract, we mutually inform our customers about the facts and circumstances related to the service or the contract. In doing so, we communicate with the contact person provided by the customer's representative, for which we record and use information about the data subject (name, workplace, position, title, entitlement, telephone number, e-mail address). The processing is based on our legitimate interest in the performance of the service contract [Article 6(1)(f) GDPR]. Invitech will process the data until the termination of the service contract.

What data processing is carried out in the context of customer service?

Customers have the possibility to manage their issues related to the service or the service contract. Invitech processes the data necessary to identify and contact the customer's representative or the person designated as contact person for the purpose of serving the customer on the basis of the legitimate interest in the performance of the service contract [Article 6(1)(f) GDPR]. The data used in this way will be processed and stored for **1 year** [retention period pursuant to Section 143(2) of the Eht.] in the case of electronic communications services and for 5 years [limitation period pursuant to Section 6:22(1) of the Ptk.] in the case of other services.

What data processing is carried out in the context of troubleshooting?

Where the data are necessary to identify and contact the customer's representative or the person designated as the contact person for the Customer in order to detect errors in the service, to identify the causes of those errors and to correct them. In the case of electronic communications services, this is based on our legal obligation to provide fault rectification services [Section 141(1) of the Eht. and Article 6 (1) (c) GDPR], and in the case of other services, on our legitimate interest in the performance of the service contract [Article 6 (1) (f) GDPR]. The data used in this way will be processed and stored for **1 year** in the case of electronic communications services [retention period pursuant to Section 143 (2) of the Eht], and for 5 years in the case of other services [limitation

period pursuant to Section 6:22 (1) of the Ptk.].

How are complaints handled?

We will keep a record of complaints made by customers against us in relation to our services, which will include, among other things, the details of the customer's representative or the person designated as contact person for identification and communication purposes. The purpose of the data processing is to record the identity of the customer, the exact time of the complaint, the content of the complaint and the information we have provided in relation to the complaint for the purpose of complaint handling and traceability. The legal basis for processing the data is our legitimate interest in ensuring the adequate quality of our services [Article 6(1)(f) GDPR]. We will keep the record of the oral complaint, the written complaint and the response for **1 year**.

Is a voice recording made in the context of the call center?

Invitech will make voice recordings of persons acting on behalf of customers during telephone communications in the course of its customer service activities, in connection with error and complaint reporting and subscriber enquiries. The legal basis for the processing of data in the case of electronic communications services is our legal obligation to record customer service calls [Article 138(8) and (10) of the Eht., Section 4(5) of NMHH Decree No. 22/2020 (XII. 21.) on the detailed rules of customer contracts of felectronic communication (hereinafter "Eszr.") and Article 6(1)(c) GDPR], and in the case of other services, to assert our legitimate interest in ensuring the appropriate quality of our services [Article 6(1)(f) GDPR]. Invitech processes and stores the recordings containing personal data for **1 year** from the date of recording [retention period pursuant to Article 4(5) of the Eszr.].

What data processing is made in the context of invoicing?

Invitech uses the data of the customer's representative, or the person designated as contact person for the purpose of sending invoices for our services to our customers for identification and transmission of the invoice. The processing is based on our legitimate interest in the performance of the service contract [Article 6(1)(f) GDPR]. The data used in this way will be processed and stored for 1 year in the case of electronic communications services [retention period pursuant to Section 143(2) of the Eht.], and for **5 years** in the case of other services [limitation period pursuant to Section 6:22(1) of the Ptk.].

What is the retention obligation under the accounting rules?

Pursuant to our legal obligation under the provisions on accounting, Invitech is obliged to keep accounting documents, including general ledger accounts, analytical and detailed records, which directly and indirectly support the accounting, in a legible form, retrievable by reference to the accounting records [Section 169(2) of Act C of 2000 on Accounting (hereinafter: Accounting Act) and Article 6(1)(c) of the GDPR]. This obligation shall remain in force for **8 years** [the retention obligation pursuant to Section 169(2) of the Accounting Act].

5.) MARKETING DATA PROCESSING

Invitech carries out various marketing activities to promote the sale or other usage of its services or in connection with these purposes.

What data processing is made for marketing purposes?

Invitech processes the data of the customer's representative, or the person designated as contact person for the purpose of sending information about offers, promotions and subscriber promotions related to its services by direct mails (e-mail or postal mail). This data is collected by Invitech either directly from the customer or, in the case of lead data transfer, from Vodafone Magyarország Plc. The legal basis for processing personal data for marketing purposes is the consent of the data subject [Article 6(1)(a) GDPR]. Invitech processes personal data for a maximum of **5 years** after the termination of the service contract.

What does the monitoring of the effectiveness of marketing campaigns mean?

Based on the specific consent of the data subject [Article 6(1)(a) GDPR], Invitech may monitor the activities of the user in relation to a message sent for marketing purposes (e.g. opening, deleting a message) by means of a web tracking beacon in order to produce a statistical statement measuring the success of the campaign. Invitech will process personal data up to a maximum amount of statistical data that allows the evaluation of the campaign.

6.) PROVISION OF DATA TO THE PUBLIC AUTHORITIES

As an electronic communications service provider, Invitech is obliged to retain and, upon request, transmit certain personal data to the courts, prosecutors, investigative authorities, the body conducting the preparatory procedure and the national security service, which are entitled to do so by law.

What are Invitech's obligations in relation to data retention (official data reporting) for law enforcement, national security and defence purposes?

Invitech retains data relating to the use of electronic communications services by subscribers, as determined in connection with the provision of such services, in order to provide data to certain bodies entitled to request data - courts, public prosecutors, investigative authorities, bodies conducting preparatory proceedings and national security services - for the purpose of ensuring the performance of their duties. This is done in order to comply with our legal obligation to retain data [Section 159/A of the Eht. and Article 6(1)(c) of the GDPR]. Invitech is obliged to keep the data in a differentiated manner for **1 or** - in the case of certain data categories defined by law - **half a year** after the termination of the subscriber contract or the generation of the data [retention period pursuant to Section 159/A(3) of the Eht.].

7.) DATA PROCESSING IN CONNECTION WITH THE CUSTOMER PORTAL

Invitech has made available to existing customers the Customer Portal, which allows them to view and download invoices, contracts, check payments, accept customized offers, track ongoing installations, report errors, find out about Invitech maintenance dates, modify pre-entered data, and request call detail.

How is the registration made?

The Customer Portal is only available to registered users. For this purpose, we record the data necessary to identify and contact the customer's representative or the person designated as contact person. This is based on our legitimate economic interest in the proper functioning of the Customer Portal [Article 6(1)(f) GDPR]. Invitech will process the data for a maximum of **1 year** after the registration becomes inactive in case a user contract is concluded.

What data processing is carried out in connection with access to the Customer Portal?

After registration, the person designated as the customer's representative or contact person is authorised to access the Customer Portal. In addition to the e-mail address you entered during registration, you will also need a password. Users are also entitled to use Google® or Microsoft® authentication to log in. In this case, no personal data will be transferred, Invitech will make the Portal available based on the data received from the authentication application. The processing of personal data is based on our legitimate economic interest in the proper functioning of the Customer Portal [Article 6(1)(f) GDPR]. Invitech will process the data for a maximum of **1 year** after the registration becomes inactive in case a user contract is concluded.

8.) RECIPIENTS

Invitech will disclose personal data about data subjects to third parties, other service providers, bodies or organisations only if required for a legitimate purpose and if Invitech has a legal basis for doing so.

To which authorities do we transfer data?

Invitech will only disclose the personal data of the data subject to the recipients specified below if it is clearly necessary for the fulfilment of the data protection obligation laid down in the electronic communications legislation:

- a) investigative authorities, prosecutors' offices, courts, preparatory bodies, administrative bodies and the national security service, which are entitled to request data under a specific law,
- b) National Bank of Hungary,
- c) Competition Authority,
- d) organisations responsible for billing, claims management, distribution management and customer information,
- e) bodies entitled by law to settle billing and distribution disputes,
- f) the executor,
- g) Central Statistical Office,
- h) infringement authority,
- i) supervisory bodies.

What other persons may we transfer data to?

Invitech may transfer personal data to, among others, the following recipients:

- a) for the purposes of bidding, planning technical implementation and transaction management, we may transfer the contact details provided during the bidding process to other 4iG Group member companies, in particular 4iG Plc., "ANTENNA HUNGÁRIA" Plc., AH Média Kereskedelmi Plc., AH Infrastruktúra Plc., Vodafone Magyarország Plc., DIGI Távközlési és Szolgáltató Ltd., Invitech ICT Infrastructure Ltd. and InviTechnocom Ltd.,
- b) for debt recovery we may transfer contact details provided by the customer to a factoring or dispute resolution organisation, advisers or bailiff.

What data processors does Invitech use?

The following data processors carry out their activities in relation to certain data processing on behalf of and for the benefit of Invitech, under contract with Invitech:

- a) in connection with the provision of the 0365 service Microsoft Ireland,
- b) in connection with the provision of IT services 4iG Plc.,
- c) in connection with the provision of digital and physical infrastructure and NOC services Invitech ICT Infrastructure Ltd.,
- d) in connection with the provision of classified data by the authorities, InviTechnocom Ltd.