## **Privacy Policy**

This privacy policy is an integral part of the General Terms and Conditions (GTC). The service provider (for the purposes of this privacy policy: controller) shall comply with the provisions of the relevant legislation in order to properly process and protect the personal and other data provided by the customer.

By the execution of the GTC, the customer declares under penalty of perjury that the personal data provided by him in the Order Form are true and correct, and accordingly, he is entitled to enter into the contract on registered office services (hereinafter: Service Contract).

Processing to be carried out by the provider shall be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation" or "GDPR"), Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Infoact"), Act V of 2013 on the Civil Code ("Civil Code"), Act CL of 2017 on the Rules of Taxation ("Taxation Act"), Decree of Ministry of Justice no. 7/2017. (VI. 1.) on the Registered Office Services (Decree) and Decree of Ministry of Justice no. 9/2017(VII.18.) amending that, and Act V of 2006 on Public Company Information, Company Registration and Winding-up Proceedings (Company Act). Concepts relating to processing are identical to the definitions of the GDPR, unless provided for otherwise by this document.

This privacy policy shall apply to the personal data provided by the customers directly to the service provider (hereinafter: Personal Information or Personal Data), and also applies mutatis mutandis to additional personal data that may have become available to the service provider during the handling of mails to the customer, however, such data shall not be collected and inspected by the service provider, only stored and transmitted to the customer.

Legal grounds for processing Personal Data:

- customer's consent,
- conclusion of the Service Contract,
- performance of the Service Contract,
- compliance with the statutory obligations relating to providers of registered office services,
- collection of the customer fee debt.

The legal ground for processing may be the essential legitimate interest of the provider, in which case, in compliance with the provisions of the GDPR, the provider has performed the legitimate interests assessment, and he will also perform it in the future to confirm that the processing is necessary for the legitimate interests of the service provider and the rights and freedoms of the data subject, which require the protection of personal data, do not take precedence over those interests.

Purpose of the processing:

- identification of the customer, communications with the customer;
- provision of the services by the provider;
- invoicing to customers;
- personal and property security;
- sending customers a direct inquiry or marketing request (e.g. newsletters);
- fulfilment of the obligations imposed on the provider, exercise of the rights imposed on the provider;
- preparation of analyses, statistics, development of services for this purpose the controller uses only anonymized data, aggregates data unsuitable for personal identification;
- protection of the customers' rights.

## Personal data processed

- Name
- Address
- Tax identification number
- Mother's name
- Place and date of birth
- ID card number
- Identification number
- Company name
- Registered office
- Tax number

- Corporate registration number
- Email address
- Photocopy of ID card / passport
- Photocopy of address card

The provider shall transfer personal data to any third parties only if the customer has explicitly consented to it — in the knowledge of the transferred data and the recipient of the data transfer - or if the transfer is authorized by law. The Provider is entitled and required to transfer all Personal Data in his its possession and duly stored by him to the competent authorities, such transfer is prescribed by law and a final official decision. The provider cannot be held liable for such data transmission and the consequences thereof. The provider shall document the data transfers in all cases and shall keep records of the data transfers.

To perform processing, the provider shall be entitled to hire a processor. The processors shall not make independent decisions, they are only contracted by the provider and are entitled to act according to the instructions received, and the provider shall control the work of the processors. Processors are entitled to hire an additional processor only with the consent of the provider. The Provider declares that the processors named in connection with the Personal Data in this prospectus, record the Personal Data transmitted to them and processed by the Provider in accordance with the provisions of the GDPR and make a statement thereon to the Provider. Data transfer to the processors specified in this prospectus may be carried out without the specific consent of the customer.

With respect to the relevant provisions of the GDPR, the provider is not required to designate a data protection officer.

If the customer specifically agrees, the provider will contact the customer at the given contact details and send him an advertisement by the direct marketing method. Advertisements may be sent by post, telephone (including SMS) or via e-mail. The advertising is in all cases subject to the consent of the customer. The customer may withdraw his consent from any newsletter at any time without giving explanation.

The provider shall ensure the security of the data, take the technical and organizational measures and establish the procedural rules necessary to enforce the applicable legislation, data protection and confidentiality rules. The provider shall take appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, ensure or destruction as well as against accidental destruction, damage and becoming inaccessible due to changes in the technology used. The provider, when defining and applying data security measures, shall take into account the current level of the technology.

The provider shall keep records of the data processed by him in accordance with the applicable legislation, ensuring that the data can be accessed only by the employees and other persons acting in the provider's interest (processors) who need them in order to perform their job or task. The controller's employees shall perform individual searches and individual operations on the data only at the request of the customers or in case it is necessary for the provision of the services.

The Provider is entitled or required to decide on the rectification, restriction or erasure of the Personal Data processed by him on the basis of the relevant legal regulations, of which he shall notify the relevant customer, as well as all those to whom he has previously transmitted the Personal Data for processing purposes. The notification may be omitted if it does not infringe the legitimate interests of the customer in view of the purpose of the processing. The provider shall delete the personal data if the processing is illegal; or if the customer requests (with the exception of statutory processing) if the data is incomplete or incorrect - and this condition cannot be legally remedied - provided that deletion is not precluded by law, and if the purpose of data processing has ceased or the time limit for data storage has expired.

Cookie policy – Web page – Processing of technical data and handling of cookies

The provider's system shall automatically record the IP address of the user's computer, the start time of the visit and, in some cases, the type of browser and operating system, depending on the computer's settings. The data thus recorded may not be combined with other personal data. The processing of the data is only for statistical purposes.

Cookies allow the provider's website (the "Website") to recognize former visitors. Cookies help the provider, as the operator of the Website, optimize the Website and customize the services of the Website according to the habits of the users. Cookies are also able to

- remember the settings, so the user will not need to re-record them when entering a new page;
- remember previously entered data, so he will not need to retype them;
- analyze the use of the website in order to ensure that, as a result of the improvements made using the information thus
  obtained, it functions as much as possible in accordance with the user's expectations, the user can easily find the information
  sought, and
- monitor the efficiency of advertisements.

If the provider displays various contents on the Website with the help of external web services, it may result in the storage of some cookies that are not controlled by the provider, so it has no influence on the data collected by such websites or external domains. These cookies are described in the regulations applicable to the given service.

The provider may use cookies to display advertisements to customers via Google and Facebook. Processing shall take place without human intervention. The users can set their web browser to accept all cookies, reject all of them, or notify the user when a cookie arrives on their machine. The setting options are usually found in the menu "Options" or "Settings" of the browser. By disabling the use of cookies, the customer acknowledges that without a cookie the operation of the Website is not complete. Detailed information at www.aboutcookies.org in English will also help with settings in different browsers.

