

PRIVACY NOTICE
(pertaining to processing for direct marketing purposes)

1. Purpose of this Notice

The purpose of this Notice is to lay down the data protection and processing principles and policies applied by **ALTEO Energiaszolgáltató Nyrt.** (registered office: H-1033 Budapest, Kórház utca 6-12; company registration number: 01-10-045985; and its subsidiaries as defined in Section 2.3, hereinafter “**Company**” or “**Controller**”) with regard to the sending of direct marketing advertisements and newsletters, as well as the Company's data protection and processing policy, which it considers to be binding.

The purpose of this Notice is to comply with the Company’s obligation to provide prior information under Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter

“GDPR”) and Section 16 of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter “Privacy Act”).

2. Purpose of Data Processing

2.1 The purpose of Processing is the presentation of the services in the Company's portfolio to business partners, sending business advertisements and newsletters.

2.2 The Controller shall not use the personal data set out in Section 5 as made available and/or provided by the Data Subject for purposes other than those set out in Section 2.1. Unless otherwise provided by law, personal data may only be disclosed to third parties or courts and/or other authorities under the relevant judicial or formal decision or with the prior, explicit Consent of the Data Subject.

2.3 Members of ALTEO Group (ALTEO and its subsidiaries within the meaning of Section 3(2)(2) of Act C of 2000 on Accounting) are not considered unauthorized third parties. The list of ALTEO Group members is available at <https://alteo.hu/az-alteo/szervezet/cegcsoport-struktura/>.

3. Legal basis for Processing

The legal basis for processing is voluntary consent (the data subject has given their consent to the processing of their personal data for one or more specific purposes) pursuant to Article 6(1)(a) of the GDPR.

4. Duration of Processing

The Company processes personal data in accordance with the provisions of Act XLVIII of 2008 on the Essential Conditions of and Certain Limitations on Business Advertising (Advertising Act), in order to achieve the purpose of processing, to the extent and for the duration necessary to achieve such purpose, or until consent is withdrawn.

5. Scope of personal data processed

The Company only processes personal data provided by the Data Subject that are necessary for the sending of direct marketing letters:

- name;
- company name;
- tax number;
- areas of interest;
- Phone number
- Email address

6. Principles of Processing

- 6.1 Personal data may only be recorded and processed for the purposes set out in Section 2, in compliance with the requirements of fairness and legality.
- 6.2 Personal data may only be processed to the extent and for the duration required to achieve such purposes.
- 6.3 Data processing shall be proportionate to the measures set out in Section 3.
- 6.4 The Company undertakes to process the personal data it obtains and controls in full compliance with the Privacy Act, the GDPR and the guidelines laid down in this Notice and not to disclose such personal data to unauthorized third parties or third parties not specified in this Notice, other than the Controller identified in this Notice.
- 6.5 The Company shall only make available the Data Subject's personal data to third parties in exceptional cases, based on judicial or formal decision or legislative provision.
- 6.6 The Company commits to ensure the integrity and confidentiality of data under Article 5(1)(f) of the GDPR and the security of processing under Article 32 of the GDPR. In doing so, it takes technical and organizational measures to ensure the protection of recorded, stored and/or processed data and prevent their destruction, unauthorized use and unauthorized alteration.

7. Control over personal data

- 7.1 The Data Subject may request information about the processing of their personal data from the Company at any time in writing by certified or registered mail sent to the Company's address or via email to compliance@alteo.hu. The Company shall consider requests for information sent by mail authentic only if they allow for the clear identification of the Data Subject. Requests for information sent by email are only considered authentic if sent from the email address used for the conclusion of the contract.
- 7.2 Upon request, the Company shall provide the Data Subject with required information within twenty-five (25) days of the receipt of the request.
- 7.3 Information is provided free of charge. Information provision to the Data Subject may not be refused except in cases set out in Privacy Act Section 19.
- 7.4 If some personal data are incorrect and correct personal data are available to the Controller or the Data Subject requests their personal data to be rectified, the Controller shall rectify the personal data. The Controller shall lock personal data instead of erasing them if requested by the Data Subject or it can be assumed based on the available information that erasure would harm the legitimate interests of the Data Subject. Blocked personal data may only be

processed as long as the processing purpose that prevented erasure exists. Rectification, blocking, marking and erasure shall be notified to the Data Subject and anyone who previously received the data for processing purposes. If the Controller fails to comply with the Data Subject's request for rectification, blocking or erasure, it shall provide factual and legal grounds to justify the refusal of the request for rectification, blocking or erasure in writing within twenty-five (25) days from the receipt of such a request. If a request for rectification, erasure or blocking is refused, the Controller notifies the Data Subject of the possibility to seek judicial remedy or recourse with the Hungarian National Authority for Data Protection and Freedom of Information.

7.5 The Data Subject may withdraw their consent at any time, without restriction, without justification and free of charge, by clicking on the unsubscribe link provided in the direct marketing/newsletter email or by post or via email, in accordance with the provisions of Section 7.1 on information provision.

8. Processing and transfer

8.1 In the course of Processing, the Company does not use a processor for the performance of tasks related to the sending of marketing advertisements.

9. Amendment of the Privacy Notice

The Company reserves the right to unilaterally amend this Privacy Notice at any time.

10. Rights enforcement

10.1 The Data Subject may assert their right to oppose (object to) the processing of their personal data in the cases set out in Privacy Act Sections 21 to 24 and GDPR Article 21. The Controller shall review the objection within fifteen (15) days from receipt of the request, decide whether it is well-grounded or not, and notify the Data Subject of its decision in writing. The Data Subject has the right to bring a lawsuit before the competent court within thirty (30) days of receiving the notification or the expiry of the notification deadline.

10.2 In order to assert their rights, the Data Subject may, in addition to the above, bring the matter before a court in accordance with the provisions of the Privacy Act and Act V of 2013 on the Civil Code of Hungary (hereinafter "**Civil Code**"), and the court will proceed giving priority to the case. Regional courts have jurisdiction over the lawsuit. At the Data Subject's option, the lawsuit may also be brought before the regional court for the Data Subject's place of domicile or residence.

10.3 The Data Subject may contact the Hungarian National Authority for Data Protection and Freedom of Information (address: H-1055 Budapest, Falk Miksa utca 9-11; postal address: H-1363 Budapest, Pf. 9.) with regard to any issues concerning the processing of their personal data.

10.4 For issues concerning processing, the Company can be contacted by email at compliance@alteo.hu.

11. Interpretative Provisions

1. 'Processing by a data processor' means performing technical tasks related to processing operations, irrespective of the methods and means used to perform such operations and the place of application, provided that technical tasks are performed on the data.
2. 'Data processor' means the natural or legal person or entity without legal personality which

processes data under contract, including contracts concluded in accordance with a provision laid down by law.

3. '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 by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
4. '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 personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
5. 'data proprietor' (data owner, data officer) means the person responsible for ensuring that the data assigned to (or managed by) them fulfill their role in the value chain. They are also responsible for ensuring that this is done efficiently (constant focus on return on investment, taking advantage of emerging opportunities through improvements, etc.) and securely (ensuring confidentiality, integrity and availability; requiring/approving efficient and effective protection). With regard to access control, it is their duty and responsibility to lay down a set of rules for access to the data owned by them (e.g. defining roles) and approve any changes (requests, withdrawals, etc.) concerning permissions within their areas of responsibility.
6. 'Personal data breach' means unlawful processing of personal data, including, in particular, unlawful access, alteration, transmission, public disclosure, erasure or destruction as well as accidental destruction or corruption.
7. 'Confidentiality' (secrecy) means a feature whereby data is only available to a predefined scope of users (authorized persons) and no one else. Secrecy is lost when confidential information is disclosed, i.e. becomes known or is made available, to unauthorized persons.
8. 'Criminal personal data' means personal data relating to criminal convictions and offenses or related security measures.
9. 'User' means a person or entity which uses one or more IT systems to perform its tasks.
10. 'Third country' means any country other than EEA states.
11. 'Consent' means any freely given, specific, and informed expression of the Data Subject's wishes by which they clearly signify their agreement to the processing of personal data relating to them in full or restricted to certain operations.
12. 'Information security' (IT security) means a state of the information (IT) system considered satisfactory by the Data Subject where closed, full, continuous and risk-proportionate protection is provided in terms of the confidentiality, integrity, availability of the data processed in the IT system and the integrity and availability of system components.
13. 'permission' means a right to process data or information or use different systems, programs or tools.
14. 'sensitive personal data' means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
15. 'Personal data' means data that can be linked to the Data Subject, including, in particular, the Data Subject's name and identification and one or more information specific to the Data Subject's physical, physiological, mental, economic, cultural or social identity, as well as any conclusion that can be drawn about the Data Subject from such data.