

Data Protection Notice

on the use of the telekomspots.hu website ("Website")

Magyar Telekom Plc. as data controller in accordance with 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 (the "**General Data Protection Regulation**"), hereby informs Data Subjects on the processing of their personal data as follows.

1. Company name and contact details of the Data Controller:

Magyar Telekom Plc. (registered seat: 1097 Budapest, Könyves Kálmán krt. 36., company registration number: 01-10-041928; tax number: 10773381-2-44; "**Data Controller**")

Contact details: hello@telekomspots.hu

2. Name and contact details of the Data Protection Officer:

dr. Adrienn Esztervári (address: 1097 Budapest, Könyves Kálmán krt. 36.; email: DPO@telekom.hu)

3. Scope of the processed personal data, legal basis, objective and duration of data processing:

| Objective of data processing | Legal basis for data processing | Scope of the processed personal data | Duration of data processing or the criteria for determining thereof |
|---|---|---|--|
| Newsletter subscriptions (contact by e-mail) in connection with the content of the Website (e.g. regular program offers, quiz games, questionnaires). | Data subject's consent (General Data Protection Regulation) Article 6(1)(a).* | e-mail address, scope of interests (optional) | Until the cancellation of the consent or the deletion of the data subject's (User's) profile by the User or the Data Controller. Consent can be withdrawn at any time either by clicking on the link at the bottom of the newsletters or within the user profile (unsubscribe). |
| Registration of users on the Website, creating a user | The data subject's (User) consent (General Data Protection | email address, profile picture (optional), name | If the email address is not validated: for 14 days. |

| Objective of data processing | Legal basis for data processing | Scope of the processed personal data | Duration of data processing or the criteria for determining thereof |
|---|---|--|---|
| profile | Regulation) Article 6 (1) (a)).* | (optional) | <p>For 1 year from the date of the last activity of the User in the data subject's (User) profile in case of a validated the e-mail address</p> <p>or</p> <p>until the registration is terminated in any other manner as specified in the Conditions of Use, including cases where the data subject (User) terminates the registration, i.e. withdraws the consent.</p> |
| Use of the Website's functions that are available upon registration | The data subject's (User) consent (General Data Protection Regulation) Article 6 (1) (a)).* | Content uploaded by the data subject (User) and content saved by the data subject (User) to the respective user account (including searches, preferences). | <p>Until the cancellation of consent, i.e. deletion of the given content, initiated by the data subject</p> <p>or until the deletion of the User's profile as specified in the Terms of Use (except for uploaded events, places, performers as the deletion of personal data contained therein can only be initiated at the contact data of the</p> |

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|---|---|---|--|
| | | | Data Controller), or until the deletion of the given content in other cases (including moderation) as set out in the Terms of Use. |
| Sending reminders and notifications as set by registered users through the channel determined by the User (the channel chosen by the User: within the application and/or via email) | Data subject's consent (General Data Protection Regulation) Article 6(1)(a).* | Content saved in the user account, user's application ID (for inside app notification) and/or email address (for email channel notification purposes) | Until consent is cancelled, i.e. until the cancellation of the given notification request initiated by the data subject (User), or until the User profile is deleted, or until the content is removed from the Website. |
| Request trusted user badge as a registered user | Data subject's consent (General Data Protection Regulation) Article 6(1)(a).* | User name, name, organizer's website or, in the absence thereof, organizer's social media platforms: Facebook, Instagram; other comments, contact info | 30 days after the rejection of the request in cases specified in the Terms of Use, or until the withdrawal of consent by the data subject (User), i.e. until the deletion of the badge initiated by the data subject (User), or until the deletion of the User profile |

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|------------------------------|---------------------------------|--------------------------------------|---|
| | | | initiated by the data subject (User), or, if the conditions set out in the Terms of Use are met, until the deletion of the badge or User profile initiated by the Data Controller. |

* The consent may be cancelled at any time. The cancellation of the consent is without prejudice to the lawfulness of consent based data processing prior to the withdrawal.

The Website User warrants that if the User provides personal data about a third party, the User has the relevant legal basis for uploading the personal data to the Website and for the publication thereof. The Data Controller shall not be held responsible for the processing of erroneous or false data provided by Users, nor for any damage caused to the Data Subject or to third parties as a result of such erroneous or false data provided by Users.

4. Automated decision-making (including profiling):

Within the frame of the data processing no automated decision-making - including profiling - takes place.

5. Forwarding of personal data, recipients and recipient categories:

The Data Controller uses the following data processors in connection with data processing:

Company name: UNIFLEX Ltd. (seat: Budapest, Vajdahunyad u. 4, 1082; company registration no: 01 09 065405; tax number: 10328259-2-42); activities related to data controlling: Website operation, development, moderation, newsletters

Sub-processors used by the data processor:

AppCorner Kft. (registered seat: Budapest, Victor Hugo u. 11, 1132)

Sendinblue (registered seat: 7 Rue de Madrid, 75008 Paris, France)

Heroku (registered seat: 650 7th St, San Francisco, CA 94103, United States)

Vercel (registered seat: Vercel Inc. 340 S Lemon Ave #4133 Walnut, CA 91789, United States)

Amazon Web Services (registered seat: 38 Avenue John F. Kennedy, L-1855, Luxembourg)

Personal data shall not be transferred to a third country (i.e. outside the European Union) or to an international organization. (The data processor used by the Data Controller uses sub-

processors with registered seat outside the European Union, however, these sub-processors use the European infrastructure and therefore no data transfer takes place.)

6. Rights of Data Subjects related to data controlling:

The Data Subject has the following rights in relation to data processing:

- a) the right of access to personal data related to the Data Subject,
- b) the right to rectify personal data,
- c) the right to erasure or restriction of the processing of personal data, except for mandatory processing,
- d) where the conditions specified by law are met, the right to data portability, and
- e) in case of processing based on legitimate interest, the right to object.

6.1. Right of access:

The data subject is entitled to request information from the Data Controller whether the processing of the personal data is in progress. If such data processing is taking place the Data Subject is entitled to access the personal data. The Data Controller shall provide a copy of the personal data, being the subject matter of the data controlling, to the Data Subject. The Data Controller may charge a reasonable fee, based on the administrative costs, for any further copies requested by the Data Subject. Where the Data Subject submits the request electronically, unless the Data Subject requests otherwise, the information shall be provided in a commonly used electronic format.

6.2. Right to rectification:

The Data Subject is entitled to request the Data Controller to correct inaccurate personal data without undue delay.

6.3. Right to erasure:

The Data Subject is entitled to request the Data Controller to delete the Data Subject's personal data without undue delay and the Data Controller is obliged to delete Data Subject's personal data without delay in cases where:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject cancels consent on which the processing is based according to Article (a) or Article 6 (1), or Paragraph (a) or Article 9 (2) of the General Data Protection Regulation and there is no other legal basis for processing;
- c) the Data Subject objects to the data processing on the basis of Article 21(1) of the General Data Protection Regulation and there are no compelling legitimate ground for the processing, or the Data Subject objects to the processing on the basis of Article 21(2) of the General Data Protection Regulation;
- d) the personal data were processed in violation of the law;
- e) the personal data must be erased in order to comply with a legal obligation under European Union or Member State law applicable to the Data Controller;
- f) the personal data were collected in connection with the offering of information society services referred to in Article 8(1) of the General Data Protection Regulation (conditions for children's consent).

6.4. Right to restriction of data processing:

The Data Subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, in such cases the restriction applies for a period that enables the Data Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the Data Subject opposes the erasure of the data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to the data processing pursuant to Article 21(1) of the General Data Protection Regulation; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the Data Controller override that of the Data Subject.

Where data controlling was restricted such personal data shall, with the exception of storage, only be controlled with the Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

6.5. Right to data portability:

The Data Subject shall also have the right to receive personal data concerning the Data Subject which were provided to the Controller in a structured, commonly used, machine-readable format and has the right to transmit such data to another Data Controller without preventing the Data Controller to which the Data Subject provided the personal data, if: (i) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

6.6. Right to object:

The Data Subject has the right, for reasons arising from a particular situation, to file an objection to the processing of personal data, where processing is performed in accordance with Article (1) e) or f) of Article 6., including any profiling based on the aforementioned provisions. In such cases the Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the data processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to the processing of personal data for such marketing purposes, which includes profiling insofar it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purpose.

6.7. General rules of exercising rights by the Data Subject

The Data Controller shall inform the Data Subject on the relevant measures taken as a response to the Data Subject's request without undue delay but no later than within one month upon receipt of the request. Where necessary and in consideration of the complexity and number of requests, this deadline can be extended with two more months. The Data Controller shall inform the Data Subject on the extension of the deadline within one month upon receipt of the request with specifying the reason thereof. If the Data Subject files the request electronically the information - insofar as possible - shall be provided electronically, too, unless the Data Subject requests otherwise.

The Data Controller shall provide the information and the measure to the Data Subject free of charge. If the Data Subject's request is clearly unsubstantiated or - in particular due to its repeated occurrence - excessive the Data Controller, in respect of the administrative costs arising from the provision of the requested information, may:

- a) charge a reasonable fee, or
- b) may refuse to fulfill the request.

The burden of proof regarding the unsubstantiated or excessive nature of the request lies with the Data Controller.

If the Data Controller has well-founded doubts on the identity of the natural person filing such requests the Data Controller may request further information to verify the Data Subject's identity.

7. Enforcement of rights:

The Data Subject may at any time contact the Data Controller's Data Protection Officer (address: 1097 Budapest, Könyves Kálmán krt. 36.; email: DPO@telekom.hu).

In the event of a complaint regarding the processing of personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf. 9., address: 1055 Budapest, Falk Miksa utca 9-11., Telephone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; E-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

If the Data Subject's rights are violated the Data Subject may turn to the competent court and file an official complaint against the Data Controller. The court shall adopt a decision in priority proceedings. The burden of proof that the data processing complies with the relevant law lies with the Data Controller. The final decision on the case shall be made by the general court, in the capital by the Budapest-Capital Regional Court. The lawsuit can also be initiated before the general court operating at the Data Subject's permanent address or place of residence.

The Data Controller shall compensate for damages caused by the unlawful processing of the Data Subject's data or the breach of data security requirements. The Data Controller shall be relieved from liability if it is able to evidence that the damage is the result of an unavoidable cause beyond the scope of data processing. No compensation is payable if the damage was caused intentionally or by gross negligence on the part of the claimant.

Date: Budapest, January 25, 2023.