

DATA PRIVACY POLICY SZOMBATH LAW FIRM

Date of entry into force: 17 July 2023

1) General provisions and contact details

This Privacy Policy (hereinafter: "Policy") applies to personal data collected and processed about you (hereinafter referred to as "Data Subject") by Szombath Law Office (registered office: 1027 Budapest, Liphay utca 9. I. em. 12.; tax number: 19343383-1-41; hereinafter: "Data Controller").

Legal representative of the data controller: dr. Bence Szombath, managing attorney

Contact details of the Data Controller, through which the Data Subject may exercise his or her rights set out in this prospectus:

Email: szombath@szombath.com

Phone number: +36 70 370 9267

2) Data protection principles

Personal data:

(a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes is not considered incompatible with the initial purpose in accordance with Art. 89 para. 1 GDPR ("purpose limitation");

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data which are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may only be stored for a longer period if the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in

accordance with Article 89 (1) GDPR, subject to the implementation of appropriate technical and organisational measures required by this Regulation to protect the rights and freedoms of data subjects ('storage limitation');

(f) processed in such a way as to ensure appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability").

3) Update of the Policy

The Data Controller reserves the right to unilaterally amend this Policy.

4) Getting to know and accept the Policy

By providing the given personal data, you declare that you have become familiar with and have expressly accepted the version of this Policy in force at the time the data was provided.

5) Scope of processed data and data processing purposes

In order to provide the service provided by the Data Controller, we may request data relating to you, and you may also voluntarily provide us with certain data in the course of your communication with the Data Controller. Some of the data we collect is "personal data" pursuant to Article 4(1) of 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 ("GDPR").

The Data Subject (person requesting an offer, appointment) has the opportunity to send a message to the Data Controller through the website. The purpose of data processing is to provide an offer and an appointment. Legal basis for data processing: performance of a contract (GDPR. Article 6(1)(a), i.e. voluntary consent of the data subject. The scope of processed data is the Data Subject:

- Surname
- First name
- your e-mail address

- Telephone number
- Message

Persons having access to the data:

- employees of the Data Controller and lawyers cooperating with the Data Controller;
- employees of the Data Processors defined below;
- certain authorities in relation to data requested by them in the course of official proceedings and required by law to be provided by the Data Controller;
- the employees of the debt management company commissioned by the Data Controller to manage overdue debts;
- other persons based on the Data Subject's explicit consent.

The Data Controller undertakes a strict confidentiality obligation without time limit in relation to the personal data processed by it, and may not disclose them to third parties, contrary to the consent of the Data Subject. The withdrawal of consent shall not affect the lawfulness of previous processing.

6) Persons authorized to process data

The Data Controller uses the data processors listed below to perform technical tasks related to data processing operations. The rights and obligations of the data processor in relation to the processing of personal data are determined by the Data Controller within the framework of the GDPR and special laws applicable to data processing. The Data Controller is responsible for the legality of the instructions given by him. The data processor may not make any substantive decision concerning data processing, may only process the personal data obtained in accordance with the provisions of the Data Controller, may not process data for its own purposes, and shall store and retain personal data in accordance with the provisions of the Data Controller.

Name and contact details of data processors:

Business Tax Plus Trading and Service Limited Partnership. It performs bookkeeping tasks and has access to the data required for accounting.

Google LLC. (USA, Google Data Protection Office, 1600 Amphitheatre Pkwy Mountain View, California 94043 - Google Analytics) For more information on the processing of data by Google Analytics, please refer to Google Analytics (<https://www.google.com/analytics>)

7) Cookies and web beacons, anonymous information through the use of our website

The Data Subject consents to the Data Controller placing a file containing data (cookie) on the Data Subject's computer. The purpose of cookies is to identify returning data subjects, to provide services to Data Subjects and to support the convenience functions of the website. The Data Controller uses only cookies of external service providers (Google) on the Website. Cookies are small text files sent by the Website to the hard drive of the Data Subject's computer and contain relevant information about the Data Subject.

The Data Controller uses the services of the Google Analytics system in connection with the Website. Cookies managed by Google Analytics help measure website visits and other web analytics data. The information collected by cookies is transmitted and stored on external servers operated by Google. Google uses this information primarily for the purpose of the Data Controller to track visits to the Website and to compile analyses of the activities performed on the Website.

Google is entitled to transfer this information to third parties if required by law. Google may also transfer this data to third parties that Google uses to process the data. For more information on the processing of data by Google Analytics, please refer to Google Analytics (<https://www.google.com/analytics>).

The Data Controller's ads are displayed on websites of an external service provider (Google). These external service providers (Google) use cookies to store that the Data Subject has previously visited the Data Controller's Website and display advertisements to Data Subjects based on this - personalized - (i.e. they carry out remarketing activities). You can opt out of Google's use of cookies through your Ads Settings (learn more <https://www.google.hu/policies/privacy/ads/>). Data subjects may also disable cookies of external service providers on the Network Advertising Initiative (<https://www.networkadvertising.org/choices/>) opt-out page.

The data processing of the above-mentioned external service providers is governed by the data protection regulations specified by these service providers, and the Data Controller assumes no liability whatsoever for such data processing.

You can set your web browser to accept all cookies, reject them all, or notify you when a cookie arrives on your computer. Each web browser is different, so please use the "Help" menu of your browser to change your cookie settings. For example, in the case of Microsoft Internet Explorer, you can delete or disable cookies by selecting "Tools/Internet Options" and change your security settings.

8) Information about children

Persons under the age of 10 are not allowed to provide personal information about themselves unless permission has been requested from a parent or guardian. In the case of the Data Subject under the age of 14, his/her legal representative or guardian may provide personal data and make a legal declaration on his/her behalf. The Data Subject who has reached the age of 14 but has not reached the age of 18 may only provide personal data and make a legal declaration with the consent of his or her legal representative or guardian.

By providing the information, you represent and warrant that you will act in accordance with the above and that your capacity to act in connection with the provision of the information is not limited. If you are not legally entitled to provide the information on your own, you are obliged to obtain the consent of the Data Subject third parties (e.g. legal representative, guardian). In this context, you must consider whether the consent of a third party is required in connection with the provision of the relevant information. It may happen that the Data Controller does not have a personal relationship with you, so compliance with this clause is your responsibility and the Data Controller is not liable in this regard.

We will make reasonable efforts to delete any information that has been unlawfully provided to us and ensure that this information is not passed on to anyone else or used by us (whether for advertising or any other purpose). Please tell us immediately if you notice that a child has provided unauthorised information about himself/herself. You can contact us at the beginning of this Policy using our highlighted contact details.

9) Data security measures

The Data Controller shall take all reasonable measures to ensure the security of the data, and shall ensure an adequate level of protection thereof, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage. The Data

Controller ensures the security of the data with appropriate technical (e.g. logical protection, especially encryption of passwords and communication channels) and organizational measures (physical protection, in particular data security training of the Data Controller's employees, restriction of access to information).

10) Rights and remedies of the Data Subject

10.1 Right of access by the Data Subject

The Data Subject shall have the right to obtain from us confirmation as to whether or not personal data concerning him or her are being processed. Where such processing is in progress, the Data Subject shall have the right to obtain access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data of the Data Subject;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if that is not possible, the criteria used to determine that period;
- the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal data concerning the Data Subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority; and
- if the data are not collected from the Data Subject, any available information as to their source;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, the significance and the envisaged consequences of such processing for the Data Subject.

Where personal data are transferred to a third country, the Data Subject shall have the right to be informed of the appropriate safeguards relating to the transfer. A copy of the personal data undergoing

processing will be provided to the Data Subject. If the Data Subject makes the request electronically, the information shall be provided in a commonly used electronic format, unless otherwise requested by the Data Subject.

10.2 Right to rectification

The Data Subject shall have the right to obtain from us without undue delay the rectification of inaccurate personal data relating to the Data Subject. The Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

10.3 Right to erasure ("right to be forgotten")

1. The Data Subject shall have the right to obtain from us the erasure of personal data 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 were collected or otherwise processed;
- b) The Data Subject withdraws consent on which the processing is based and there is no other legal basis for the processing;
- c) The Data Subject objects to the processing and, where applicable, there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed
- e) the personal data must be erased for compliance with a legal obligation under Union or Member State law to which we are subject; or
- (f) the personal data have been collected in connection with the offer of information society services.

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking into account available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the Data Subject has requested such data from the controller, either with links to, or with a copy of, those personal data, or the deletion of its duplicate.

3. Paragraphs 1 and 2 shall not apply where processing is necessary, inter alia:

- (a) for exercising the right to freedom of expression and information;

- b) for compliance with an obligation to process personal data under Union or Member State law to which we are subject;
- (c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (d) for the establishment, exercise or defence of legal claims

10.4 Right to restriction of processing

(1) The Data Subject shall have the right to obtain from us restriction of processing where one of the following applies: a) The accuracy of the personal data is contested by the Data Subject, in which case the restriction applies for a period enabling us to verify the accuracy of the personal data; b) the processing is unlawful and the Data Subject opposes the erasure of the data and requests the restriction of their use instead; c) we no longer need 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; or d) The Data Subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate reasons of the Data Controller override those of the Data Subject. Where processing has been restricted pursuant to paragraph 1, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence 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 Union or of a Member State. We will inform the Data Subject in advance of the lifting of the restriction of processing.

10.5. Notification obligation related to rectification or erasure of personal data or restriction of processing:

The Data Controller shall communicate any rectification, erasure or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. At the request of the Data Subject, we will inform you about these recipients.

10.6 Right to data portability

(1) The Data Subject shall have the right to receive the personal data concerning the Data Subject which he or she has provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller

without hindrance from the Data Controller where:
a) processing is based on consent or on a contract;
and (b) processing is carried out by automated means. When exercising his or her right to data portability pursuant to paragraph 1, the Data Subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible.

10.7 Right to object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her based on legitimate interest, including profiling. In this case, the personal data will no longer be processed unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence 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 processing of personal data relating to the Data Subject for such marketing, including profiling to the extent that it is related to such direct marketing. If the Data Subject objects to the processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes. In connection with the use of information society services and by way of derogation from Directive 2002/58/EC, the Data Subject may exercise his or her right to object by automated means based on technical specifications. Where personal data are processed for scientific or historical research purposes or statistical purposes, the Data Subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data relating to the Data Subject, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

10.8 Right to lodge a complaint with a supervisory authority

The Data Subject may enforce his or her rights in court pursuant to the GDPR and the Civil Code, and may turn to the National Authority for Data Protection and Freedom of Information (NAIH) (seat: 1055 Budapest, Falk Miksa utca 9-11; mailing address: 1363 Budapest, Pf.: 9. ; phone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu) in case of a complaint arising in connection with the data management practices of the data controller. The detailed rights and legal remedies related to data processing are detailed in Articles 77, 79 and 82 GDPR.

10.9 Right to an effective judicial remedy against a supervisory authority

The Data Subject shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning the Data Subject. The Data Subject shall have the right to an effective judicial remedy if the competent supervisory authority does not handle the complaint or does not inform the Data Subject within three months of the progress or outcome of the complaint lodged. Proceedings against a supervisory authority should be brought before the courts of the Member State where the supervisory authority is established.

10.10 Right to an effective judicial remedy against the controller or processor

The Data Subject shall have the right to an effective judicial remedy if he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data in non-compliance with the GDPR. Proceedings against a controller or processor should be brought before the courts of the Member State in which the controller or processor has an establishment. Such proceedings may also be brought before the courts of the Member State of habitual residence of the Data Subject. Before initiating a procedure, it is recommended to send the complaint to the controller.