Data Processing Information

1. Data Controller

https://shakett.com/ The website accessible at the internet address is managed and owned by the T.E.T.T. Mérnökiroda Korlátolt Felelősségű Társaság Company.

| Tax ID: | 12210127243 |
|------------------------------|---|
| Company Registration Number: | 01 09 564900 |
| Full Name: | T.E.T.T. Mérnökiroda Korlátolt Felelősségű Társaság |
| Short Name: | T. E. T. T. Mérnökiroda Kft. |
| Registered Office: | 1212 Budapest, Erdélyi Street 25. |
| Branch Office: | 6500 Baja, Teller Ede Street 10. |

2. Legal Regulations Regarding Data Processing, Scope of the Information

2.1. The data controller primarily processes user data in accordance with the provisions 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 (General Data Protection Regulation) (hereinafter: GDPR).

• Act CVIII of 2001 on certain issues related to electronic commerce services and information society services (hereinafter: Ekertv.).

2.2. The scope of this information applies to the processing of data during the use of the website https://shakett.com/ (hereinafter: the website) and the utilization of the services available on the site.

2.3. According to this information, a User is defined as a natural person browsing the website or utilizing the services provided by the website.

3. Legal Basis for Data Processing

3.1. The legal basis for certain data processing activities performed by the Data Controller is, according to Article 6(1)(a) of the GDPR, the User's consent.

3.2. In the case of data processing based on consent, the User gives their consent by checking the checkbox placed before the relevant data processing declaration. The User can read the data processing information anytime by clicking on the "Data Processing Information" inscription at the bottom of every page on the website, or by clicking on the link marked with the text "Data Processing Information" as stated in this section. By checking the checkbox before the data processing declaration, the User declares that they have read the data processing information and, with knowledge of its content, consent to the processing of their data as described in this information.

4. Data Processing Related to Ensuring the Operation of Information Technology Services

4.1. The Data Controller utilizes cookies to operate the website and collect technical data related to website visitors.

4.2. The Data Controller provides a separate information sheet about data processing carried out by cookies: Data Processing Information on the Use of Cookies.

5. Data Processing Related to Receiving and Responding to Messages

5.1. The scope of data subjects affected by data processing: Users who send messages to the Data Controller using the email address provided on the website.

5.2. Legal basis for data processing: User consent based on Article 6(1)(a) of the GDPR.

5.3. Definition of the scope of processed data: The User sending the message:

- Name,
- Represented company,
- Email address,
- Any additional data provided by the User in the message.

Regarding any additional personal data possibly disclosed in the message, the Data Controller only processes data as necessary for receiving the message, but does not request the User to provide unexpected personal data. In the case of the disclosure of such unexpected personal data, the Data Controller does not store it and promptly deletes it from its information system.

5.4. Purpose of data processing: Facilitating communication with the User through message exchange with the Data Controller. Services related to this include:

• Receiving messages sent via email (using the email address(es) provided on the website),

• Responding to messages received by the Data Controller, which is done within 2 business days.

5.5. Duration of data processing: Until the message is responded to or the User's request is fulfilled. The Data Controller deletes the data processed for this purpose after responding to the message/fulfilling the request. If information exchange involves multiple, related message exchanges, the Data Controller deletes the data after the conclusion of the information exchange or the fulfillment of the request.

5.6. Method of data storage: In a separate data processing list in the Data Controller's information system.

6. Data Transmission

6.1. The Data Controller does not transmit data to third parties.

6.2. The Data Controller only transmits data to authorities in the case of a legal obligation.

6.3. The Data Controller maintains a record of data transmissions for possible data transfers.

7. Utilization of Data Processors

7.1. Hosting Service Provider

7.1.1. The scope of data subjects affected by data processing: Users visiting the website, regardless of using the services provided by the website.

7.1.2. The Data Controller uses the following as a data processor:

| Company Name: | Next-Inform Informatikai és Telekommunikációs Kft. |
|----------------------|--|
| Registered Office: | 2113 Erdőkertes, Nemes u. 5/a. |
| Tax ID: | 14300310-2-13 Company |
| Registration Number: | 13-09-119835 |
| CEO: | Morár István |
| Phone/Fax: | (+36 1) 220 93 97 |
| Mobile: | (+36 70) 453 4000 |
| Email: | info@next-inform.hu |

(hereinafter: Data Processor).

7.1.3. Definition of the scope of processed data: The data processing involves all the data specified in this information.

7.1.4. Purpose of data processing: Ensuring the information technology operation of the website.

7.1.5. Duration of data processing: It aligns with the data processing periods regulated according to the purposes of data processing for each data category specified in this information.

7.1.6. Method of data processing: Data processing is exclusively for providing the necessary hosting for the operation of the website in terms of information technology.

7.2. Data Processing Related to Electronic Correspondence 7.2.1. The scope of data subjects affected by data processing: Users sending electronic emails to the email address provided on the website. 7.2.2. The Data Controller uses the following as a data processor:

Company Name: Next-Inform Informatikai és Telekommunikációs Kft.

(hereinafter: Data Processor).

Registered Office: 2113 Erdőkertes, Nemes u. 5/a.

Tax ID: 14300310-2-13 Company

Registration Number: 13-09-119835

CEO: Morár István

Mobile: (+36 70) 453 4000

Email: info@next-inform.hu

7.2.3. Definition of the scope of processed data: Data processing involves the name and email address of the User sending the electronic email.

7.2.4. Purpose of data processing: Ensuring the information technology operation of the software used by the Data Controller for electronic correspondence, through data processing manifested in technical operations necessary for the secure operation of the software.

7.2.5. Duration of data processing: Until the message is responded to or the User's request is fulfilled. The Data Controller deletes the data processed for this purpose after responding to the message/fulfilling the request. If information exchange involves multiple, related message exchanges, the Data Controller deletes the data after the conclusion of the information exchange or the fulfillment of the request. The deletion by the Data Controller terminates data processing.

7.2.6. Method of data processing: Data processing is exclusively for technical operations necessary for the operation of the electronic email software in terms of information technology.

7.3. Data processing for other purposes does not occur.

7.4. Apart from the designated Data Processors mentioned above, the Data Controller does not engage any other data processors.

8. User Rights Regarding Data Processing

8.1. Right of Access: Upon the User's request, the Data Controller provides information about the User's personal data processed by them or by a Data Processor appointed by them, including the source of the data, the purpose of data processing, the legal basis, the duration, the name and address of the Data Processor, and the circumstances of any data protection incidents, their effects, and the measures taken to address them. If personal data is transmitted, the legal basis and recipient of the data transmission are also disclosed. The information is provided by the Data Controller without undue delay and, at the latest, within one month from the receipt of the request. As part of the right of access, the Data Controller provides the User with a copy of the personal data being processed, within one month from the receipt of the request. For any additional copies requested by the User, the Data Controller may charge a reasonable fee based on administrative costs (as per point 9).

8.2. Right to Data Portability: The User has the right to receive their personal data provided to the Data Controller in a structured, commonly used, machine-readable format, and has the right to transmit this data to another data controller without hindrance if: a) the data processing is based on the User's consent or a contract; and b) the data processing is carried out by automated means. When exercising the right to data portability, the User has the right to request the direct transmission of personal data between data controllers, if technically feasible.

8.3. Right to Rectification: The User may request the correction of their processed data, and the Data Controller shall fulfill this request without undue delay, but no later than within one month from the receipt of the request. Taking into account the purpose of data processing, the User is entitled to request the completion of incomplete personal data, including by means of a supplementary statement.

8.4. Right to Restriction of Processing: The Data Controller marks the personal data they process for the purpose of restricting processing. The User is entitled to request that the Data Controller restrict the processing if one of the following applies: a) the User disputes the accuracy of the personal data, in which case the restriction applies for the period allowing the Data Controller to verify the accuracy of the personal data; b) the data processing is unlawful, and the User 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 the processing, but the User requires them for the establishment, exercise, or defense of legal claims; or d) the User has objected to processing based on the legitimate interests pursued by the Data Controller, pending verification whether the legitimate grounds of the Data Controller override those of the User.

8.5. Right to Erasure: The Data Controller deletes personal data if: a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed; b) the User withdraws consent, and there is no other legal basis for the processing; c) the User objects to the processing, and there are no overriding legitimate grounds for the processing, or the User objects to the processing for direct marketing purposes; d) the personal data has been unlawfully processed; e) erasure is required to comply with a legal obligation under Union or Member State law to which the Data Controller is subject; or f) the User has requested erasure or objected to processing in the context of the offer of information society services directly to children. The Data Controller informs the User and all recipients to whom the data has been disclosed about rectification, restriction, and erasure. Notification can be omitted if it is impossible or involves disproportionate effort. Upon request, the Data Controller informs the User about these recipients.

8.6. Right to Object: The User has the right to object at any time to the processing of their personal data based on the legitimate interest of the Data Controller. In this case, the Data Controller may not process the personal data unless they demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the User, or the processing is necessary for the establishment, exercise, or defense of legal claims.

9. Fulfillment of User Requests

9.1. The Data Controller provides information and takes action in accordance with the provisions of point 8 free of charge. If the User's request is clearly unfounded or, especially due to its repetitive nature, excessive, the Data Controller, taking into account the requested information or action involving administrative costs: a) may charge a reasonable fee, or b) may refuse to act on the request.

9.2. The Data Controller informs the User about the measures taken as a result of the request, including the issuance of data copies, without undue delay, but no later than one month from the receipt of the request. If necessary, considering the complexity and number of requests, this deadline may be extended by an additional two months. The Data Controller informs the User of the extension, along with the reasons for the delay, within one month of receiving the request. If the User submitted the request electronically, the information is provided electronically, unless the User requests otherwise.

9.3. If the Data Controller does not take action on the User's request, they inform the User without undue delay, but no later than one month from the receipt of the request, about the reasons for not taking action and the possibility to lodge a complaint with the supervisory authority referred to in point 10, and to seek judicial remedy as described therein.

9.4. The User can submit their requests to the Data Controller in any way that allows their identification. User identification is necessary because the Data Controller can only fulfill requests for information from those authorized to receive it. If the Data Controller has justified doubts about the identity of the natural person submitting the request, they may request further information to confirm the identity of the User.

9.5. The User can submit their requests to the Data Controller by post to the address Teller Ede u. 10., 6500 Baja, Hungary, or by email to info@shakett.com. An email request is considered valid only if sent from the User's email address registered with the Data Controller, and the use of another email address does not imply the disregard of the request. In the case of email, the date of receipt is considered the first working day following the date of sending.

10. Data Protection, Data Security

10.1. The Data Controller ensures the security of data within the scope of its data processing activities through technical and organizational measures, as well as internal procedural rules, to enforce compliance with legal regulations and other data and confidentiality protection rules. Adequate measures are taken to protect processed data against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as against accidental destruction, damage, and becoming inaccessible due to changes in the applied technology.

10.2. The data used as a basis for measuring website traffic and mapping user habits are recorded by the Data Controller's IT system in a way that makes them not directly attributable to any individual.

10.3. Data is processed only to achieve the purposes defined in this notice, in a manner necessary and proportionate, in compliance with relevant laws and recommendations, and with appropriate security measures.

10.4. To this end, the Data Controller uses the "https" scheme for accessing the website, enabling the encryption and unique identification of web communication. Additionally, the Data Controller stores processed data in encrypted data files, separated by data processing purposes, in compliance with the above, in data processing lists. Specific employees assigned by the Data Controller to perform tasks related to specified activities, as indicated in this notice, have access to these lists. Their job responsibilities include the protection of data and the responsible management of this notice and relevant legal regulations.

11. Enforcement of Rights

Individuals may enforce their rights in court, and they can also turn to the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information Address: 1055 Budapest, Falk Miksa utca 9-11. Postal address: 1363 Budapest, Pf. 9. Phone: +36 1 391 1400 Fax: +36 1 391 1410 Email: ugyfelszolgalat@naih.hu Website: http://www.naih.hu/

If the court is chosen, the lawsuit can be initiated – at the discretion of the User – before the court having jurisdiction over their domicile or place of residence, as the adjudication of the lawsuit falls within the competence of the court.

2023.03.01. T.E.T.T. Mérnökiroda Korlátolt Felelősségű Társaság