

# PRIVACY POLICY

## THE COMPANY'S DATA MANAGEMENT PRINCIPLES

M2M Rendszerház Kft. and WM Systems LLC. (hereinafter referred to as the Company as a joint Data Administrator) provide detailed information management activities for the purpose of proper information management.

The Company declares that it fully adheres to the provisions of the applicable data protection laws when handling personal data. The Company will take appropriate measures to take into account the possibilities offered by IT technology, the costs of implementation and the nature, scope, circumstances and objectives of data management and the varying probability of risk to natural persons' rights and freedoms, in order to be able to guarantee data security of an adequate risk level.

The Company's data management principles are in line with existing data protection legislation, in particular:

- on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and Regulation (EC) No 2016/679 of the European Parliament and of the Council (27 April 2016), as amended by Regulation (EC) No 95/46 (hereinafter referred to as GDPR);
- Act CXII of 2011 on the right to information self-determination and freedom of information. Act ;
- Act V of 2013 on Civil Code;
- Act XIX of 1998 on criminal proceedings;
- Act C of 2000 on Accounting ;
- Act CVIII of 2001 on e-commerce services and information society services ;
- Act C of 2003 on electronic communications;
- Act CXXXIII of 2005 on the rules of personal and property protection and private investigators;
- Act I of 2012 on the Labor Code;
- Act II of 2012 on infringements, infringement procedure and the system of infringement registration.

## INTERPRETING PROVISIONS

Concerned: Any natural person identified or identifiable, directly or indirectly, based on one or more factors, on the basis of personal data.

Personal Data: Any or all of the information relating to the concerned person, such as name, number, location data, online identifier or physical, physiological, genetic, intellectual, economic, cultural or social identity of the natural person.

**Contribution:** a voluntary, concrete, and informed and clear statement of the will of the person concerned, with which they give their unambiguous consent to the handling of personal data relating to them.

**Protest:** a statement of the person concerned that objects to the handling of his or her personal data based on the legitimate interest of the data controller or third party and asks for the termination of the data processing and the cancellation of the processed data.

**Data Administrator:** a natural or legal person or a non-legal entity that either independently or with others determines the purpose and means of managing the data, makes and executes decisions on data management (including the equipment used) , or gets a data processor to execute it.

**Data management:** regardless of the method used, any operation or aggregate of operations, such as collecting, capturing, recording, rendering, tagging, storing, modifying, transforming, utilizing, retrieving, transmitting, publishing, aligning, linking, blocking, deleting and destruction of data, access to data and prevent further use of data, capture photographs, sound or images, and record physical features (such as finger or palm print, DNA pattern, iris image) for identifying the person.

**Transmission:** To make the data available to a specific third party.

**Disclosure:** making the data available to anyone.

**Data deletion:** make data unrecognizable in such a way that their recovery is no longer possible.

**Data designation:** Providing the data an identifying mark to distinguish it.

**Data encryption:** for the purpose of limiting the continued handling of the data with an identifying indication for a definite or fixed time period.

**Data Destruction:** Total physical destruction of data-containing media.

**Data Processing:** Perform technical tasks related to data management operations, regardless of the method and device used to perform operations, and the location of the application, provided that the technical task is performed on the data.

**Data processor:** a natural or legal person or an organization without legal personality who, on the basis of a contract concluded with the data controller, including the conclusion of a contract by law, processes the processing of the data, handles personal data on behalf of the data controller.

**Records:** all the data processed in one register.

**Privacy incident:** a security breach resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise handled.

**Third party:** a natural or legal person or an organization without legal personality who is not the same as the person concerned, data controller or data processor, or persons authorized to manage personal data under the direct control of the data controller or data processor.

**EEA State:** a Member State of the European Union and a State party to the Agreement on the European Economic Area, as well as a State whose citizen under an international agreement between the European Union and its Member States and a non-member State not party to the Agreement on the European Economic Area, shall enjoy the same status as a citizen of a State Party to the Agreement on the Area.

**Third country:** any State other than an EEA State.

## RANGE OF PERSONAL DATA MANAGED BY THE COMPANY, THE OBJECTIVE, SUBJECT AND DURATION OF THE DATA MANAGEMENT, DATA TRANSMISSION

The data management of the Company's activities is justified by performance of the contract or in the legitimate interest of the Company. If the personal data is not from the person concerned, the data supplier has the obligation to determine the legal grounds for the personal data processing of the person concerned and to inform them.

The Company keeps a record of the data processing which performs under Article 30 of the GDPR.

### Recording and management of product development data

The purpose of the data management: to offer quotation, purchase, billing, delivery.

Personal Data Handled: contact name, address, e-mail address, telephone number, and data related to the performance of the contract.

The legal basis for data handling is GDPR Article 6 (1) (b) and (f) and the Accounting Act.

Period of data management: according to Article 169 (2) of the Accounting Act, at least eight years, according to Article 6 (1) (b) and (f) of the GDPR, on the basis of an interest analysis, pending the receipt of the statement of the protestor concerned.

Transmission: For deliveries to courier companies, to entities designated in the legislation related to the performance of the Financial Services of the Company.

### Data management for contact (newsletter, web registration)

The purpose of the data management: to get into and keep contact with the persons concerned; information about the Company's activities and the services it provides.

Scope of managed data: contact name, address, phone number, e-mail address.

Legal basis for data handling: GDPR Article 6 (1) (f).

Duration of the data handling: pending receipt of the protest statement of the concerned party.

Transmission: None.

### Handling of Electronic Observation System Data

Purpose of data management: The Company operates an observation system capable of capturing an image for the protection of its activities (assets, managed business secrets and personal data). The observation system records the external area of the Company's headquarters, potential entry points, entry and exit.

The range of data processed is physical, image, and motion picture.

The legal basis for data processing: Article 6 (1) (f) of GDPR, the Labor Code., the rules of personal and property protection and private investigators;

Duration of data handling: on the basis of 31. § of the Act on the rules of personal and property protection and private investigators; in accordance with Article 6 (1) (f) of the GDPR and the test of interest consideration, can be up to 30 days.

Data transmission: in case of interest detriment to the authorities specified in the law.

## Measurement data collection

The Company's service provides a measurement data collection system that collects and makes available the measurement results of energy consumption to the companies managing the accounts of consumers and / or to the consumers. In this regard, the Company is Data Processor.

The purpose of the data processing is to collect measurement data, calculate the absolute value of the meter readings according to the instructions of the data controller, to produce measuring hour jobs in the format requested by the data controller.

The scope of the personal data handled: the metric is the data set contained in the individual contract per collection.

Legal basis for data processing: GDPR Article 6 (1) (b).

Duration of data processing: during a contract period and one year from termination of the contract.

Access to information: For operational and debug purposes, the Company's engineer specialists based on access records.

## Other data management

Information on data management not listed in this section is disclosed by the Company to the persons concerned on the basis of Section 20 of the Information Act and Article 12 of the GDPR.

## Exercise of the concerned person's rights

### Transparent information and communication

The Company provides information on the management of personal data in a concise, transparent, understandable and easily accessible form, in a clear and unambiguous way.

After proper identification, the Company shall ensure that its rights related to data management are exercised within one month of the receipt of the request, which may be extended by another two months. It shall inform the person concerned on the extension of the time limit by indicating the reasons for the delay.

The concerned person may submit the request electronically or personally. The information may be provided by the Company in electronic form, unless otherwise requested by the person concerned.

### Exercising access

The person concerned has the right to receive feedback from the Company about whether their personal data is being processed. In the case of data processing in progress, they will be given access to the following information:

the purposes of data management;

the categories of personal data concerned;

the case of the data transmission and the addressees;

the intended duration of the storage of personal data or the criteria for determining that period;

rectification, deletion or restriction of data management and the right to protest;

the right to file a complaint addressed to the Data Protection Authority;

if the data is not collected from the person concerned, all available information about their source;

where personal data are transmitted to a third country or to an international organization, the required legal safeguards.

At the request of the person concerned, the Company shall make a copy of the personal data subject to data processing. For additional copies requested by the entity, the Company may charge a reasonable fee based on administrative costs.

### Data correction

During the data processing period, the concerned person may request the correction of inaccurate personal data relating to him / her at any time. Data may also be corrected if the Company detects that data is not factually accurate.

In the case of a correction of the data, the false data can be deleted and the real data can only be collected if the unsuitability of the data to be deleted can be established without any doubt and the document certifying the authenticity of the data to be entered is available to the Company.

In the event of a change or modification of the data in the database, the concerned person shall notify the Company in writing of the change and the exact contents of the changed data within five working days of the date of data change and modification.

The notification must be accompanied by documents for verifying the changed data. Legal consequences concerning notification failure or late delivery are charged to the defaulting party.

The concerned person must submit a notification of correction of the data or change of data to the Company in writing. If the data correction or data change concerns a contract forming part of the legal relationship, its modification must be annexed to the above written request.

If there is a dispute between the Company and the person concerned regarding the facts, content or time of data correction or change of data, the parties are obliged to consult.

The data correction or change of data reported by the concerned person shall be effected by the Company or by the concerned person within 30 working days of receipt of the notification. The person concerned must be notified of the correction and all those to whom the data have previously been transferred for data handling. Notification may be omitted if it does not prejudice the legitimate interest of the data concerned for the purpose of data handling.

### Restricting data management

At the request of the person concerned, the Company restricts the processing of data if:

the person concerned disputes the accuracy of the personal data, in this case, the restriction refers to the time period for the data controller to check the accuracy of the personal data;

data handling is illegal and the person concerned is opposed to the deletion of the data and instead asks to limit their use;

the data controller no longer needs personal data for data management, but the person concerned requires them to submit, enforce or protect legal claims; vagy

the person concerned objected to data processing under Article 21 (1) GDPR; in this case, the restriction applies to the duration of determining whether the data controller's legitimate reasons prevail over the legitimate grounds of the party concerned.

In the case of limited data management, data handling is not possible except for storage.

### The concerned person`s right to protest

The person concerned may object to the handling of his or her personal data if the processing of personal data is necessary to enforce the legitimate interests of the data controller or third party.

The Company shall examine the protest within the shortest possible time but not later than 30 days from the submission of the request, and decide on the matter of its validity and shall inform the applicant in writing. If the Company establishes the validity of the protests concerned, it discontinues the processing of data, including further data collection and data transfer, and locks the data, as well as informs all those on the protest and measures taken on the basis of that to whom the personal data affected by the protest had previously been transmitted, and who are obliged to take action to enforce the right to protest.

### Data deletion

The personal data must be deleted if:

- the data is illegal to handle;
- the party concerned withdraws their consent and there is no other legal basis for data handling,
- the data is incomplete or incorrect and can not be legally corrected, provided that the deletion is not excluded by law;
- the purpose of data management has ceased or the statutory deadline for data storage has expired;
- it has to comply with a legal obligation.
- The organizational unit that records the personal data is obliged to monitor the termination of the purpose of the data management and to provide for the cancellation of the treated data without delay.
- The person concerned must be notified of the cancellation and all those to whom data has previously been transferred for data handling. Notification may be omitted if it does not prejudice the legitimate interest of the data concerned for the purpose of data handling.

## Data portability

The Company does not perform automated personal data management that is based on the consent of natural persons belonging to its clientele or based on a contract, therefore the right of portability does not belong to the person concerned.

## Incident management

In case of a data incident related to the data handled by the Company, the data controller must be notified without delay.

The reporting of a privacy incident may take place as follows:

Personal notification: M2M Rendszerház Kft. and WM Systems LLC., 1222 HUNGARY, Budapest, 8 Villa str., on working days from 9 am to 5 pm,

Written notification by e-mail at the email address: [adatvedelem@m2mserver.com](mailto:adatvedelem@m2mserver.com).

## Legal remedy

If the party concerned does not agree with the decision of the Company, he or she may appeal to the court within 30 days from the date of its communication.

An appeal can be lodged with the Hungarian National Authority for Data Protection and Freedom of Information. :

Name: Hungarian National Authority for Data Protection and Freedom of Information.

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Telephone: +36 1 391 14 00 Fax: +36 1 391 14 10

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Web page: <http://www.naih.hu>

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