

PRIVACY POLICY – SEMICONT'06 Trading Co. Ltd.

Please read the Prospectus carefully to understand how we handle your personal information and to understand your privacy rights.

As a data controller, Semicont'06 Ltd. respects the privacy of all persons to whom we transfer personal data and is committed to their protection. Pursuant to Article 13 of the General Data Protection Regulation of the European Union (Decree No 679/2016, hereinafter "GDPR") it provides the following information:

Data Controller Information:

Company name: Semicont'06 Kft.

Headquarters: 2600-Vác, Szent László út 23.

Website: www.semicont.com

Contact: Rita Tulák-Kovács managing director

Phone: 06-27 / 200-950

E-mail: info@semicont.com

Data Protection Officer: The controller is not required to appoint a Data Protection Officer under Article 37 of the GDPR

Privacy Requests: If you have any inquiries or questions regarding data management, you may send your request by mail or electronically to: 2600-Vác, Szent László út 23., info@semicont.com. We will send your replies without delay, but within 30 days to the address you requested.

Data processing: no data processing is used.

Data transfer abroad: no transfer abroad.

1. Data Management Purposes (OPTIONAL)

The Controller shall process the data for the following purposes in accordance with the law:

- a) In connection with the provision of distribution (purchase, sale) of waste collection devices, the data of the users of the service are processed for the purpose of fulfilling a legal obligation and maintaining customer relations;
- b) Marketing activity to prospective clients;
- (c) management of data on employees and applicants;
- (d) managing partner contact information;

- (e) fulfillment of customer orders;
- f) property protection, personal safety;
- (g) internal administrative facilitation;

2. Legal grounds for the use of your personal data

The following are the legal bases for the use of your personal information:

- (a) issue of an invoice in conformity with the accounting legislation: Legal basis: Article 6 (1) (c) of the GDPR
- (b) contact: legal basis: Article 6 (1) (f) of the GDPR. In case of data of partners' employees, the legal basis of data management and the weighing of interests. The data controller has a legitimate interest: business continuity.
- c) Employee Data Management: Article 6 (1) (b), (c) GDPR.
- (d) treating contractual partner data: legal basis Article 6 (1) (b) GDPR
- (e) Marketing activity: legal basis: Article 6 (1) (a) GDPR.
- (f) Legal basis for online registration: Article 6 (1) (a) GDPR
- (g) Operation of a security camera Legal basis: Article 6 (1) (f) of the GDPR. The data controller has a legitimate interest: property protection, in the case of employees, the employer's legitimate interest.

The balancing tests in (b) and (g) are available upon request to the XX email address.

3. Duration of data management

Invoices will be retained for legal purposes for at least eight years. The documents on which the invoice is based are kept for eight years.

Retention period of the underlying documents: 50 years.

The contact information is retained for a maximum of one year after the connection has been established.

Retention of contract performance data: five years.

4. Rights Affected

The data subject has statutory rights in relation to his or her personal data.

Rights affected:

- (a) the right of access (access to data, the fact that data are being processed);
- (b) if an item is outdated or incorrect, adjust it;
- (c) deletion (only in the case of consent-based data processing);
- (d) limitations on the management of the data;
- (e) a ban on the use of personal data for direct marketing purposes;
- (f) the transfer or prohibition of the communication of personal data to a third party service provider;
- (g) requesting a copy of any personal data processed by the controller; or
- h) protest against the use of personal data.

4 Remedies information

In Hungary, the data protection supervisory authority is: National Data Protection and Freedom of Information Authority (1125 Budapest, Szilágyi Erzsébet fasor 22 / C) ugyfelszolgalat@naih.hu.

Litigation: Data protection lawsuits fall within the jurisdiction of the Tribunal. At the choice of the data subject, the lawsuit may be instituted before the court in the place where the data subject is domiciled or habitually resident.

Records of data processing (Article 30 GDPR)

Activity	Managed Data	Data Management Purpose	Data Management Legal Basis	Data Transfer Method	Time of Storage
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Issue of accounting document	Name
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Home address

(tax number) invoice for the provision of services	GDPR Article 6 (1) (c)	Accounting Office	At least 8 years
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Accounting and book-keeping activities	Name
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Home address

(tax number) invoice related to the provision of services, preparation of balance sheet	GDPR Article 6 (1) (c)	Bíbor Könyvelőiroda Kft. Accountant	At least 8 years
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Contact Information	Name
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phone number

E-mail address	Date reconciliation, cancellations	GDPR Article 6 (1) (a)
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Registration Information	Name
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phone number

Email Address Creating a Client Account GDPR Article 6 (1) (a) Web Hosting:

Esolve Ltd. one year

Order fulfillment Name

phone number

E-mail address

Address v. delivery address Order fulfillment, product delivery GDPR Article 6 (1) (b) Logistics partner:

Hilltop Logistics Ltd.

Piermazo-Trans Kft.

DPD Ltd. five years

Name complaint handling

phone number

E-mail address

Address v. shipping address consumer complaints handling Article 6 (1) (c) GDPR

Act XX Consumer Protection Officer: Executive

legal consultant

Dr. Krisztián Gróf Law Firm Ltd. five years

recalls name

phone number

E-mail address

Address v. shipping address consumer complaints handling Article 6 (1) (c) GDPR

Consumer Protection Officer: Managing Director

five years

recalls name

phone number

E-mail address