

Data Protection Notice

(Effective from 1 January 2026)

KUPON Portfolio and Investment Management Limited Liability Company (Registered office: 2161 Csommd, 40. Street, Tax number: 12®96127-2-44, Company registration number: 1«-09-1654«9; hereinafter referred to as: "Information Provider" (hereinafter: "Company" or "Data Controller") hereby informs the data subjects that the parties to the agreement, the representatives of the parties, and the recipients of the data processing order issued by the company (hereinafter referred to as "Éii→tctt"), and the binding terms and conditions of the data processing agreement (in the others:

"Information Notice"). This privacy notice explains the processing of personal data in accordance with the European Parliament and Council Regulation (EU) 2016/679 (hereinafter: ~~the~~ :agQ "Regulation"), Act V of 2016 on the Civil Code (hereinafter: "Ptk"), Act CXII of 2011 on the right to information and freedom of information (hereinafter: "I→fot:."), in accordance with the relevant legislation. The provision reserves the right to make changes due to the need to ensure consistency with legislative amendments and other internal regulations that may be introduced in the meantime.

Data controller details:

Company name: **KUPON Portfolio and Investment Management Limited Liability Company**
Registered office: **Csomad, Liget u. 40.**
Company registration number: **1«-09-1G54«9**
Tax number: **1289G127-2-44**
Website: **i→fo@kugopostpaid.ku**
Website: **www.kugopostpaid.ku**

Information catalogue:

This prospectus contains information on the company's legal entity details and the terms of the offering. The prospectus only contains information on the legal entity and its details ~~→ subject~~ information, as specified in the jclc→ information notice.

The Company may amend the Privacy Policy at its sole discretion. The amendment shall enter into force upon publication on the Company's website and shall take effect from the date specified in the amendment. The company shall notify the parties to the agreement of any amendments to the prospectus in accordance with the relevant legal provisions.

Legal basis for data processing:

The disclosure of account data is lawful only to the extent that it is necessary to fulfil the obligations of the data controller, in particular to ensure the security of the data:

- 1) the processing of personal data provided by the data subject for multiple purposes;
- 2) Data collection is necessary to identify the causes of the problem, :agQ the necessity of taking steps to fulfil the obligations arising from the contract prior to its conclusion;
- «) the need to ensure compliance with the legal obligations relating to data processing;
- 4) data processing is necessary for the legitimate interests pursued by the data controller;
- 5) the data processing is necessary for the performance of a task carried out in the public interest by the data controller;
- 6) data processing is necessary for the data controller to fulfil its legal obligations, including those arising from the law The data controller shall ensure that the data subject's fundamental rights and freedoms are protected, which necessitates the processing of personal data, in particular the data subject's right to data protection.

Conditions for disclosure:

If the data disclosure is based on a legal obligation, the data controller must provide proof of it, and the data of the person concerned must be disclosed for the purposes of the disclosure.

If the data subject's consent is given in writing the declaration is submitted, and if the declaration also relates to the company, the disclosure must be made in a manner that distinguishes it in a distinctive manner from other data, i.e. it must be clearly identifiable as data relating to public relations, and it must be clearly identifiable as such. The statement containing the terms and conditions of use is an integral part of this agreement, and is binding upon the user.

The person entitled to the declaration may **request its disclosure**. The right to request disclosure is based on the public information law, and the right to request disclosure is lawful. The data controller must inform the data subject of this right. The consent form must be completed in writing, as must the consent itself.

Once the terms have been agreed, as well as the public service's operational costs, the operator must ensure that the service is provided at a higher standard, and the completion of the settlement process – including the provision of services – requires the collection of the necessary data, which are necessary for the fulfilment of the contract.

Data disclosure

Data processing carried out by the Data Protection Authority

The agreement is based on the contract concluded with Magyar Közút Nemzeti Zrt. ("MK NZR"), in accordance with the Toll Act (Act XVII of 2017 on tolls for the use of public roads, including tolls for the use of motorways, motorways and expressways) Act XVII of 2017 provides for the provision of services relating to the collection of tolls. The data disclosure requirements relating to this are set out in the General Terms and Conditions published by ÁSZI (General Terms and Conditions of the KUPON Ltd. as the General Terms and Conditions of the Agreement between the Issuing Agency and the Contracted Collectors) and the data disclosure requirements set out in the relevant provisions, excluding the data reporting requirements set out in Sections 10 and 12 of the ÁSZI.

The register records the details of the entities providing the services specified in the agreement on the cooperation of the regulatory authorities, and for the purposes of registration the client and the registered parties. The Service Provider (the Designated Service Provider) shall, from the date of the conclusion of the Agreement between the Service Provider and MK NZR, for a period of 5 years calculated from the termination of the legal relationship between the Insurer and the Policyholder.

The company shall only be liable for the loss if the loss is attributable to the negligence of its management and the ÁSZI's financial statements, reports and legal documents are in order. The scope of the data controller's activities includes data collection, processing and disclosure, as well as the information provided to the data subject, including the agreement with the organisation, which aims to establish a contractual relationship with the organisation, even if the agreement has not yet come into effect, as the existence of the contract is linked to the personal data, both in relation to the MK NZR and in relation to the data subject, which is still subject to verification.

The organisation shall, in accordance with the data protection regulations, store the data in its internal database and the data of its designated contact persons (name, telephone number, address). Other personal data is only collected if it has come to our attention in connection with a complaint, request or legal dispute, or if it is necessary for that purpose.

The purpose of collecting the data specified in this section is to conclude a contract with the Client, and the fulfilment of the contract between the Client and the Service Provider, the

fulfilment of the contract between MK NZR and the Service Provider, and the maintenance of the relationship.

The legal basis for data processing is the publication of the ÜgQrcl, the performance of the contract concluded with the ÜgQrcl, and the Toll Act: The legal basis for data processing is established by the relevant legislation, the necessity of processing personal data, and the legitimate interests of the operator in connection with the collection of tolls.

E-invoice issuer (HD): data reporting carried out by the issuer

The service provider, on the basis of the contract concluded with MK NZR, is obliged to the administrator shall carry out the calculation of the e-matícat (HK service) in accordance with Decree 45/2020. 2.) Il'M íc→dclct szcí→t c-matíca (HK szolgáltatms) éítékcstését :égzi :iszo→tcladóké→t. The contract forms part of the General Terms and Conditions of Contract for the Assessment of Fees published by MK NZR (Hungarian Public Roads Priority Management Operating Company Limited Liability Company) :iszo→tcladók íészéic – a jclc→i po→tba→i a to:mbbiakba→i: ÁSZI).

The provisions of the ÁSZI data protection regulations and the relevant annexes form the basis for the classification of the MK data processors, whilst the HK's appointed auditors are classified as sub-data processors.

The data processing activities of the organisation (data processing operations), their purpose, legal basis and the scope of the data processed are set out in the ÁSZI and its annexes. The legal basis for data processing is the public interest, the performance of the contract between the MK NZR and the company, as well as the performance of contracts between the Ministry and contracted parties (including contractors), and the processing of data relating to the fulfilment of the State's legitimate interests, the purpose of data processing being the fulfilment of contracts and the maintenance of related relationships.

Data processing related to contractual legal relationships (including data processing and related data processing activities involving payment service providers and HD service providers)

The controller shall inform data subjects of the processing of their personal data in accordance with the provisions of this Act. If – in accordance with Article 14(1) of the GDPR – the data is obtained from the controller, the controller shall inform them of the details of the data processing by publishing the privacy notice.

In the case of a contract concluded by electronic means, or in connection with the performance of a contract concluded by electronic means, the data subject shall be informed of the data processing

- a) identifying data, such as the details of the legal entity entering into the contract (e.g. company name, registered office), as well as data necessary for communication (telephone number, email address)
- b) address details of the account holder (name, address, postcode, post office box, postcode, time), as well as contact details (telephone number, email address, home address).

The purpose of data collection is to conclude contracts, fulfil obligations and maintain contact. The duration of data processing depends on the specific circumstances, as the data controller determines the purpose of the data processing. In this regard, the time limit for data retention is governed by Section 169(2) of Act C of 2000 on Accounting, provided that the data is retained from the date of the transaction until the date of the transaction, and for the remaining data, for a period of 5 years in accordance with the general retention periods set out in the Civil Code.

The legal basis for data processing is Article 6(1)(b) of the GDPR, specifically the performance of the contract, and the conclusion of the contract.

Data processing relating to applications, applicants and CVs

The purpose of data processing relating to the personal data of employees is to ensure that the employer as the controller, to identify the data subject to whom the personal data relates.

The legal basis for data processing is Article 6(1)(a) of the GDPR, based on public interest. The scope of the data collected depends on the specific data required by the State, but generally includes: name, date of birth, address, email address, telephone number, other contact details, educational details, photograph. Article 17(1)(a) of the GDPR stipulates that personal data may be processed for the purposes of the data collection, provided that the purpose of data collection is legitimate. The controller shall retain personal data for a period of at least one year from the date of disclosure, during which the data controller shall ensure the security of the data and provide access to it for the relevant parties. The company informs the data collection of the details. In accordance with the Data Protection Act, the company will retain the data for a maximum of 6 months.

Data processing related to employment

The purpose of data processing is the establishment, operation and management of the employment relationship. The legal basis is Article 6(1)(c) of the GDPR, based on the fulfilment of a legal obligation, whilst Article 6(1)(b) of the GDPR covers the fulfilment of contractual obligations. The processing of personal data of employees is carried out in accordance with the principles of purpose limitation and data minimisation; the processing of data is limited to the relevant provisions of the applicable data protection legislation

relevant binding legal provisions, and such provisions shall apply to the company's processing of personal data of employees. Section 10(1) of the Act regulates the collection of personal data relating to employees. The aforementioned provision stipulates that only the following may be collected from the data subject:

The declaration is required for the disclosure of data, which is subject to the right of access, and is made for the purposes of establishing, verifying and monitoring compliance with the terms of the contract. Only a person who has passed a suitability test may act as a representative, provided that the relevant regulations governing the establishment of the company are complied with. The company ensures that the data is processed in accordance with the applicable data protection legislation.

The data of those requesting information (including personal data, which is subject to the data protection regulations of the Data Protection Authority)

For the purposes of providing information, a website and a web service have been set up. If you wish to receive further information via the website or the contact service, please provide your contact details: name, email address, company profile, contact details, company name, and the position of the person maintaining the contact. The legal basis for data processing is Article 6(1)(a) of the GDPR, based on the public interest. The data will be retained for one year from the date of fulfilment of the purpose of the processing.

If the data subject objects to the processing of the data, the data controller shall cease processing the data in question. The data provided in the application regarding the applicant's eligibility for the grant, as well as the relevant information regarding the application, shall be assessed by the Authority in terms of its criteria, conditions and justifications

The company ensures that the data is processed in accordance with the applicable data protection legislation. The company ensures that the data is processed in accordance with the applicable data protection legislation.

Data processors

Data processing related to the website: Data processor: Slimlogic Ltd. Registered office: 1151 Budapest, Bogáncs utca 5.

Data processing related to the provision of services:

Microsoft Corporation (Redmond, Washington 99052, USA)
<https://pii.microsoft.com/k-HU/>

Data processors related to the service:

Cloud service provider: ICL Scitccs Krt., 101 Budapest, Kíszti-út 9.

Address management → Data controller → c, registered office:

- Gícpito → Zít., 10⁷ Budapest, Kö → Q:cs Kmlmm → kít. 4⁸-52.
- I → itcck ICL Scitccs Krt., 101 Budapest, Kíszti-út 9.

Publisher: Gícpito → Zít., 10⁷ Budapest, Kö → Q:cs Kmlmm → kít. 4⁸-52. Accounting firm: Visio-Softwaíc Ltd., 1149 Budapest, Pósa Lajos utca 51.

Data: financial information

In accordance with Article 4 of the GKPR, data protection refers to the protection of personal data, ~~which~~ the collection, processing, storage, disclosure, and use of personal data :agQ legal basis for the collection, processing, storage, unauthorised disclosure :agQ and unauthorised access to such data. The data controller shall, without undue delay, and in any event no later than 72 hours after the data controller must inform the data subject of the relevant legal consequences, including that the data controller

: the data controller's rights and freedoms

Amc → Qibc → the data controller :alószí → usítktöc → poses a high risk to the rights and freedoms of data subjects → In the event of an unjustified delay, the controller shall inform the data subject of the data protection incident. The notification shall include the controller's and the intermediary's identification details, and shall provide the information required for the decision-making process.

1. Your rights:

1.1. Right to information:

The data subject's fundamental right is the right to be informed by the controller. The data subject is entitled to receive information from the controller regarding the processing of personal data, including information regarding the processing of personal data and the conditions for data disclosure, including a concise, clear, effective and accessible statement of the rights of data subjects, :ilmgosa → and közéltktöc → mcgrogalmaz:a → Qújtsa.

1.2. The right to public disclosure under the Act:

The data subject has the right to receive a copy of the personal data concerning them, including the right to access their personal data :a → c, and if the data is included in the data processing procedure :a →, the data subject has the right to be informed of the purpose of the data processing

- a) purpose of data processing,
- b) the categories of personal data processed,
- c) the categories of recipients to whom the personal data have been disclosed, the identity of the third-party recipients, or the nature of the cross-border processing,
- d) the time limit for the retention of personal data, the grounds for the retention of personal data,

- c) the right of the data subject, the right to request the correction, deletion or restriction of processing of personal data relating to him or her, and to object to the processing of such personal data,
- r) the right to submit a complaint to the competent supervisory authority,
- g) information on the source from which the data was obtained, including the relevant legal provisions,
- k) regarding automated decision-making, including profiling, a clear explanation of the logic applied and the relevant evaluation criteria, as well as the reliability of the data collection and the applicable legal framework.

The public administration ensures the right to access information and the right to request copies of documents from the State Treasury. The Éííííííí charges a reasonable fee for the copies it issues, based on administrative costs. The Court provides the necessary information to the administrative body. The Court's decisions, Qíbcí's financial statements, confirm the company's compliance with the relevant regulations and provide relevant information.

1. «. Right to appeal:

The data subject has the right to request that the controller, without undue delay, rectify any inaccurate personal data. For the purposes of data processing, the Data Controller is also entitled to request the supplementation of incomplete personal data.

1.4. Right to rectification:

The Data Subject is entitled, on the basis of the Act, to request the deletion of the relevant personal data, whilst the Data Controller is obliged to delete the relevant personal data, whilst the data subject is obliged and the relevant personal data must be deleted without undue delay, provided that the conditions are met:

- a) the personal data is no longer necessary for the purpose for which it was collected
- b) the Data Subject has withdrawn the consent on which the data processing is based, and the data processing no longer has any other legal basis,
- c) the Data Protection Authority objects to the data processing and the legal ground taking precedence over the data processing,
- d) the personal data has been lawfully collected,
- e) the personal data is required for the fulfilment of a legal obligation under the applicable national law of the Member State,
- f) the personal data collection the information information related to the provision of services: contact details.

The processing of data is based on the fact that the necessity of data processing is confirmed by Article 17 of the GDPR.

The data retention period covers data relating to the provision of services, provided that the contract is still in force or has been terminated. This does not apply to cases where other legislation provides for a different procedure.

1.5. Data retention obligations:

The Act stipulates that data processing is permitted provided that the following conditions are met:

- a) the Court of Justice: confirms the validity of the personal data, provided that the restriction applies to the time period in question, and the data controller is responsible for the processing of personal data,
- b) the right to data portability, and the right to restrict the processing of data,
- c) the necessity of processing personal data for the purposes of data processing, but the Court of Justice has ruled that legal requirements for the collection, processing and use of such data
:
- d) the Data Subject has objected to the processing, in which case the processing shall be suspended
:o→applies until a final decision is reached, provided that the legitimate interests of the data subject take precedence over the legitimate interests of the data controller.

If the data disclosure is limited to the data required for the purpose of the request, other data processing is carried out exclusively for the purposes of fulfilling legal obligations or for legitimate interests, or for public interest purposes.

1.G. Data subject's rights:

The State is entitled to receive, in a structured, commonly used and machine-readable format, all data processed for the purposes of public administration, , and to receive it in a machine-readable format; the data subject is also entitled to request that the data be transferred to another data controller, provided that this is necessary for the performance of the contract, and has provided the personal data for the purpose of processing. The data controller is also entitled to request the deletion of personal data if the data subject requests it. This applies to all legal grounds for processing.

The data controller is responsible for the technical and organisational security measures.

1.7. Right to object:

The Éíi→tctt is entitled to, for reasons relating to the protection of personal data, to refuse to disclose data concerning the identity of the person lodging the complaint, provided that such disclosure would not be contrary to the public interest as defined by law : the disclosure of data necessary for the performance of public authority functions, :agQ kmíasmg :agQ cgQ kaímadik rél legitimate éídkci→ck éí:é→Qcsítésékc sz!kségcs kzcclésc cl!c→, idcéít:c az cmlítctt íc→dclkczésckc→ alap"ló píorilalkotmst is.

The data subject has the right to request that the controller erase personal data, provided that the data subject can demonstrate that there are legitimate grounds for erasure, provided that this does not infringe upon the fundamental rights and freedoms of the individual, and where such processing is necessary for the fulfilment of a legal obligation or for the exercise of a legal claim.

If the processing of personal data is carried out for the purpose of direct marketing, the data subject is entitled to object to the processing of the relevant personal data for that purpose, including by invoking the right to erasure, provided that relates to the processing of personal data.

1.8. Automated decision-making and profiling:

The data subject is entitled to know who is processing their data, in particular regarding automated data processing – including profiling – to make decisions that have a significant impact on you, provided that you have been informed of this and have given your explicit consent.

The applicable legal provision states that data processing is necessary for the performance of the contract between the State and the local government, :agQ the decision is based on the applicable national law, which is in accordance with the Member State's legal framework, and which also establishes the legal framework serving the legitimate interests of the State, :natural→legitimate interests :serving the purpose of mcgrclcló i→tézkcdecsckct, :agQ the Éíi→tctt

kircjczctt kozzmjmi"lmsm→ basis".

1.9. Right of return:

The State is entitled to revoke its own public service.

2. Rules of procedure:

The service provider shall not be liable for any delay in delivery, but in any event, the Court shall inform the Court of Justice of the decision

→Qomm→. It is necessary to specify the total duration of the proceedings and the number of hearings, as the time limit may be extended by a further two periods.

The Ministry of Defence shall inform the Parliament of the reasons for the delay in the extension of the service period, as well as the number of days calculated from the date of the request. If the Éíí→tctt has not yet received the notification, the notification must be sent to the Éíí→tctt, stating that the Éíí→tctt requires it.

If the delivery of the goods is delayed, Qomm→, késccclcm →dclcgkésőbb the Éíí→tctt shall, within cgQ kó→apo→ bcl!! of the date of the decision, inform the Éíí→tctt of the reasons for the decision, :alami→t aííól, kogQ az Éíí→tctt pa→aszt →Qújtkat bc :alamclQ rcllgclcti katósmgm→ml, and exercises its right to appeal.

The media ensures the dissemination of the relevant information and news. If the government's actions are unfounded – due to repeated, unjustified requests – the request is excessive, the provision of the requested information Qújtmsm:al :agQ the application's decision-making process:al jmíó administrative costs, and reasonable fees are calculated, :agQ mcgtagadkatja the application's basis→ for the decision.

The applicant shall be informed in writing of the decision taken by the authority regarding the collection, processing and disclosure of data, who provided the personal data, and that the data subject :agQ aím→Qtala→"l →agQ cíőrcsízést igé→Qcl. The Éíí→tctt shall inform the addressees of the request.

The service provider shall make copies of the data forming the basis of the data processing available to the Éíí→tctt for inspection. For any further copies requested by the Éíí→tctt, the l'míasmg shall charge a reasonable fee based on administrative costs. If the Éíí→tctt, the information provided in the application shall be deemed to have been ~~pl~~ unless the Authority requests otherwise.

«. Publication and subscription fee:

Anyone who, in the course of interpreting the Rc→dclct, :agQo→i :agQon :agQo→i kmít szc→i:cdctt, is entitled to compensation from the data controller :agQ and the data processor. The data controller and the data processor shall be jointly and severally liable for ensuring that the data subject is informed of the reasons for the restriction in a manner that is transparent and comprehensible.

4. Right to appeal:

The Act sets out the conditions for the exercise of rights in relation to the processing of personal data. The right to

lgQbc→ soío→ kí:ll jmí cl. The lawsuit concerns the unlawful processing of data by the Éíí→tctt: specifically, the breach of data protection regulations. The Éíí→tctt shall be liable for damages arising from the breach of its contractual obligations. The exemption from liability applies where the damage is caused by circumstances beyond the control of the data controller. The penalty shall be imposed on the person concerned, and the penalty shall be payable Qibc→ the defendant is liable for the damages caused by the infringement of the right to privacy, as determined by the High Court

:agQ súlQosa→ go→datla→ magataítmmból szmímozott.

Amc→→Qibc→→, in connection with the disclosure of personal data, has established contact with
:a→→, kéj!k, :cgQc t
:cl!→→k the email address provided for the purpose of linking the data in the Ímíasmg.

5. Data security:

The data controller undertakes to ensure the security of personal data and to implement technical and organisational measures to ensure that the personal data collected is protected against unauthorised access, disclosure, alteration, or destruction. The data controller also undertakes to ensure that any third party processes the personal data on our behalf, "provided that they are only informed of the scope of their obligations".

G. Responsibility for data processing:

The legal basis for the processing of personal data is the following provision of the ~~NRA~~ Data Protection and Freedom of Information Authority:

National Authority for Data Protection and Freedom of Information 1055 Budapest, Miksa utca 9-11.

Postal address: 106 Budapest, Pr.: 9

Tel: +46-1-91-1400

Fax: +46-1-91-1410

Email: gOrclszolgalat@-aik.k