

DATA HANDLING AND PRIVACY POLICY

On behalf of Sapience Europe Ltd. (hereinafter referred to as the "Data Controller"), we inform the data subjects about the purposes of the processing of their personal data, the legal basis and duration of the processing, the scope of the data processed, the persons entitled to access the data, the sending of newsletters, the processing of cookies (http cookies), as well as their rights in relation to the processing and their remedies.

By creating and making available this privacy notice (hereinafter the "Notice"), the Data Controller aims to ensure that the General Data Protection Regulation of the European Union (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 Regulation (EC) No 95/46/EC (General Data Protection Regulation, hereinafter "GDPR") and the right to information of the data subject as defined in Article 12 and Article 16 of Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information (hereinafter "Infotv.").

The purpose of this Notice is to provide data subjects with adequate information about the data protection and data management principles, rules and regulations applied and respected by the Data Controller.

The subject matter of this Notice covers all processes in which personal data are processed by all departments of the Controller.

Please read this Notice carefully so that you understand how we process your personal data and your rights in relation to data processing.

1. NAME OF THE CONTROLLER

Name of data controller: **Sapience Europe Tanácsadó Korlátolt Felelősségű Társaság**

Short name of the data controller: **Sapience Europe Ltd.**

Registered office of the Data Controller: **1025 Budapest, Szemlőhegy utca 33/B. fszt. 2., Hungary**

Company registration number of the Data Controller: **01 09 348604**

Tax number of the Data Controller: **27086537-2-41**

Data Controller's representative: **Zoltán László Kovács managing director (acting alone)**

Phone: **+36 30 999 4223**

E-mail: **contact@sapiencebusiness.com**

Website: <https://sapiencebusiness.com/>

2. GENERAL CONCEPTS

1. **Data subject:** a natural person who is or may be identified on the basis of any information (a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person);

2. **Personal data:** any information relating to an identified or identifiable natural person (the data subject) (such data that can be associated with the data subject include, in particular, the name, an identifier and one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of the data subject, and the inferences that can be drawn from the data concerning the data subject);

3. **Special categories of personal data:** any data which fall within special categories of personal data, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for the purpose of uniquely identifying natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons;

4. **Controller:** the natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes for which the data are to be processed, takes and implements the decisions concerning the processing (including the means used) or implements them with the processor, within the limits set by law or by a legally binding act of the European Union;

5. **Data processing:** any operation or set of operations which is performed upon data, regardless of the procedure used, in particular collection, recording, recording, organisation, storage, alteration, use, consultation, disclosure, transmission, alignment or combination, blocking, erasure and destruction, as well as prevention of further use of the data, taking of photographs, sound or image recordings, and recording of physical characteristics which can be used to identify a person (fingerprints, palm prints, DNA samples, iris scans);

6. **Data processor:** a natural or legal person or an unincorporated body which processes personal data on behalf of or under the instructions of the controller, within the limits and under the conditions laid down by law or by a legally binding act of the European Union;

7. **Personal data breach:** means a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or transmission of, or access to, personal data transmitted, stored or otherwise processed.

3. PRINCIPLES OF DATA MANAGEMENT

The Data Controller shall process all data that constitutes as personal data in accordance with the principles of lawfulness, fairness, transparency and data economy.

The Data Controller shall process personal data only for specified purposes, with the prior consent of the data subject, to the minimum extent and for the minimum period necessary to achieve the purposes. Where the purpose of the processing ceases to exist or the processing is otherwise unlawful, the data shall be erased.

The Data Controller shall not use the data for profiling purposes and shall not transfer them to third parties, except for the fulfilment of its legal obligations.

4. LEGAL BASIS FOR PROCESSING

The Data Controller informs the data subject that the processing of personal data is lawful if at least one of the following legal grounds is fulfilled:

- the processing is based on consent,
- the processing is necessary for contracting and fulfilment of contract,

- the processing is necessary for compliance with a legal obligation,
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party,
- processing is in the public interest or necessary for the performance of a task carried out by the controller in the exercise of official authority.

The Controller hereby informs you that, where the processing of personal data is based on consent, the data subject shall have the right to withdraw his or her consent at any time. The Data Controller informs that the withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

The Controller further informs and draws the attention of the data subject to the fact that, where the personal processing is based on law or on the performance of a contractual obligation, the possible consequence of not providing the data may be that the data subject may not be able to use the services of the Controller.

The Controller does not verify the personal data provided by the data subject. The data subject is solely responsible for the data provided.

5. SCOPE OF PROCESSING (DESCRIPTION OF INDIVIDUAL PROCESSING)

5.1. FOR ACCELERATOR APPLICATIONS

Name of data processing	Purpose of data processing	Legal basis for data processing	Those concerned	Data processed	Data storage period
ACCELERATOR application	Connecting with investors	Consent under Article 6(1)(a) GDPR	Applicants	- Name (first name, and last name) - Email - Phone number	For 12 months from the date of application

5.2. FOR GENERAL ENQUIRIES ABOUT THE SERVICE(S)

Name of data processing	Purpose of data processing	Legal basis for data processing	Those concerned	Data processed	Data storage period
General interest in the service(s)	General information about the service	Consent under Article 6(1)(a) GDPR	Persons interested in a service	- Name (first name, and last name) - Email - Phone number - City	For 12 months from the date of interest

5.3. WHEN USING THE SERVICE

Name of data processing	Purpose of data processing	Legal basis for data processing	Those concerned	Data processed	Data storage period
Service	Contracting and fulfilment of contract	Pursuant to Article 6(1)(b) of the GDPR, the performance of the contract	Clients	Name (company name, first name, last name, tax identification number, company registration number) Email Phone number	Until claims under the contract are time-barred
Processing of contact details identified in contracts	Maintenance of a contractual relationship	Legitimate interest under Article 6(1)(f) GDPR	Contact persons	Contact person's name, email, phone number	Until claims under the contract are time-barred
Invoicing	Provision of services	The legal obligation on the controller under Article 6(1)(c) GDPR to.	Clients	Billing name Billing address	8 years under the Accounting Act (Hungary)

5.4. NEWSLETTER

The Data Controller maintains on its website an interface for online subscription and unsubscription to the newsletter in accordance with the rules of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

The Data Controller sends newsletters based on the prior consent of the Data Subject. In case of consent, the Data Controller shall send direct marketing messages and newsletters with advertising content to subscribers on a regular basis.

The Data Controller informs the Data Subject that, in relation to direct marketing (direct marketing) messages sent by means of newsletters, advertising, the Data Subject may at any time, without restriction and without giving reasons, inform the Data Controller free of charge if he/she no longer wishes to receive such notifications.

In each case where the Data Subject receives a newsletter with marketing content from the Data Controller, the Data Controller shall inform the Data Subject that he or she has the possibility to unsubscribe from the sending of marketing material at any time.

Name of data processing	Purpose of data processing	Legal basis for data processing	Those concerned	Data processed	Data storage period
Newsletter sending	Sending electronic messages containing advertising to the data subject, providing information on current information, products, promotions	Consent of the data subject pursuant to Article 6(a) GDPR	All persons subscribed to the newsletter	- Name (first name, and last name) - Email	Until the withdrawal of consent, i.e. unsubscription

5.5. DATA PROCESSING CONCERNING WEBSITE VISITORS

The website of the Data Controller uses Google Analytics by Google Inc. ("Google") to analyse the number of visitors to its website. The Google Analytics system stores so-called "cookies" - simple, short, small text files - on your computer.

If you would like to manage your cookie settings or disable this feature, you can do so on your own IT device in your browser. Depending on the browser toolbar, you will find the location of the cookie/cookies/tracking features, but in general you can set which tracking features you want to enable or disable on your IT device under Tools within the Settings within the Privacy settings.

Users who do not want Google Analytics to report on their visit can install a browser extension to disable Google Analytics. This add-on instructs Google Analytics' JavaScript scripts (ga.js, analytics.js, and dc.js) to stop sending visit information to Google.

To disable Analytics web activity, please visit the Google Analytics blocking page (<http://tools.google.com/dlpage/gaoptout>) and install the add-on on your browser. For more information on installing and removing the add-on, please refer to the help for your browser.

If you need more information about Google cookies, please visit: <https://www.google.com/policies/technologies/cookies>

Name of data processing	Purpose of data processing	Legal basis for data processing	Those concerned	Data processed	Data storage period
Cookie(s)	In order to provide a personalised service, the website places and reads back a small data packet, known as a cookie, on the website visitor's computer.	Consent under Article 6(1)(a) GDPR	Visitors	Date, time, the IP address of the user's computer, information about the browser on the user's computer and the address of the page visited.	Until withdrawal of consent The Data Controller processes and stores the user data obtained through the use of cookies to the extent necessary and proportionate for the purpose, for the minimum period necessary
Google Analytics	Independent measurement of traffic and other web analytics data	Legitimate interest within the meaning of Article 6(1)(f) of the GDPR	Visitors	Date, time and address of the site visited	26 months

6. DATA SECURITY

The Data Controller's website and its IT system for data processing are protected against cyber-attacks, misuse, viruses and other physical attacks aimed at obtaining the data it processes.

In the operation of the IT systems, the necessary access control, internal organisation and technical solutions are in place to ensure that data subjects' data cannot be accessed by unauthorised persons, and that unauthorised persons cannot delete, extract or modify the data.

We keep records of any data protection incidents and, if necessary, inform the data subject of any incidents that occur, where required by the GDPR and the Infotv.

7. WHO IS ENTITLED TO ACCESS THE DATA

Personal data may be accessed by employees of the Data Controller who have access rights related to the relevant processing purpose, or by persons or organisations performing processing or outsourcing activities for the Data Controller on the basis of service contracts, to the extent and to the extent necessary for the performance of their activities, as determined by the Data Controller.

The Data Controller shall disclose personal data of the data subject in connection with a request from a public authority, for the purpose of providing information to the competent authorities, communicating or transmitting data or making documents available, to the extent strictly necessary for the purpose of the request.

The controller informs the data subject that no personal data will be transferred outside the European Union, i.e. to a third country. Where personal data is transferred to parties outside the EEA, appropriate safeguards will be put in place to ensure that the transfer complies with the requirements of the GDPR.

The Data Controller hereby informs the data subject that the Data Controller, as the invoice issuer, is obliged to forward the invoice data from the invoicing program to the National Tax and Customs Directorate immediately after the invoice is issued, if the amount of the VAT passed on exceeds HUF 100,000.

The Data Controller uses the services of the following data processors for the processing of data concerning the data subjects within the framework of service contracts for this purpose.

Márton Tóth, sole proprietor (registered office: 2461 Tárnok, Munkácsy utca 39.; registration number: 50257953) develops and operates the website of the Data Controller and performs data processing activities.

MS City Audit Ltd. (registered office: 1025 Budapest, Pusztaszeri út 36. 6., company registration number: 01 09 986245).

8. THE RIGHTS OF THE DATA SUBJECT

The data subject shall have the right to obtain, in respect of the personal data processed by the Controller, in accordance with the conditions set out in the GDPR and the Infotv:

- A. to be informed of the facts relating to the processing before the processing starts,
- B. to obtain, at his request, access to his personal data and to information relating to the processing of those data, including the following information
 - a. which personal data,
 - b. on what legal basis,
 - c. for what purpose of processing,
 - d. from what source,
 - e. for how long it processes them,
 - f. to whom, when, under which law, to which personal data, to whom the Company has granted access or to whom it has transferred your personal data.
- C. The Data Controller may, upon your request and in the further cases set out in this Chapter, correct or supplement your personal data,
- D. at your request and in the further cases specified in this Chapter, restrict the processing of your personal data by the Controller,
- E. upon your request and in the further cases specified in this Chapter, have your personal data erased by the Controller,
- F. The Data Subject shall have the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation.

The Data Controller shall inform the data subject of the action taken on the request without undue delay and at the latest within 25 days of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further 2 months.

The Data Controller shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within 1 month of receipt of the request. Where the data subject has made the request by electronic means, the information shall be provided by electronic means where possible, unless the data subject requests otherwise.

If the controller does not take action on the data subject's request, the controller shall inform the data subject without delay and at the latest within 1 month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right to judicial remedy.

The information, notification and action shall be provided free of charge. Where the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Controller shall, taking into account the administrative costs of providing the requested information or information or of taking the requested action:

- charge a reasonable fee; or
- refuse to act on the request.

Where the Controller does not process the personal data indicated by the data subject, the Controller shall also inform the data subject in writing.

8.1. RIGHT TO RECTIFICATION AND ADDITION

The data subject may request in writing that the Data Controller amend personal data that is inaccurate, incorrect or incomplete. In such a case, the Controller shall, without undue delay, but no later than within 5 (five) days, correct or rectify the personal data or, if compatible with the purposes of the processing, supplement it with additional personal data provided by the data subject or with a declaration by the data subject on the personal data processed. The controller shall notify the data subject thereof by electronic or postal mail to the contact details provided by the data subject.

The controller shall be exempted from the obligation to rectify where

- the accurate, correct or complete personal data are not available to the Data Controller and are not provided by the data subject; or
- the accuracy of the personal data provided by the data subject cannot be established beyond reasonable doubt.

8.2. RIGHT TO RESTRICTION OF PROCESSING

The data subject may request in writing that the Controller restrict the processing of his or her personal data. During the period of restriction, the Controller or a processor acting on its behalf or under its instructions may carry out processing operations other than storage of the personal data subject to the restriction solely for the purposes of the legitimate interests of the data subject or as provided for by law. The restriction of processing may be requested by the data subject at any time and for any period:

- where the data subject contests the accuracy, correctness or completeness of the personal data processed by the controller or the processor and the accuracy, correctness or completeness of the personal data processed cannot be established beyond reasonable doubt (for the period necessary to resolve the doubt),
- where the data should be erased but there are reasonable grounds to consider, on the basis of a written statement by the data subject or on the basis of information available to the controller, that erasure would undermine the data subject's legitimate interests (for the period of the legitimate interest not to erase),
- if the data should be deleted but are necessary to be kept as evidence in proceedings by or with a public authority (until the investigation or proceedings have been concluded).

In the case of restriction, personal data may be processed, except for storage, only with the consent of the data subject 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 important public interests of the Union or of a Member State of the European Union.

The controller shall inform the data subject in advance of the lifting of the restriction on processing.

The controller shall, without undue delay after complying with the data subject's request to exercise his or her right to restriction, inform the persons to whom the personal data of the data subject have been disclosed, provided that this is not impossible or involves a disproportionate effort on the part of the controller. At the data subject's request, the controller shall inform him or her of those recipients.

8.3. RIGHT TO ERASURE

The data subject may request the erasure of his or her personal data in writing. The data subject shall make his or her request for erasure in writing and shall indicate the reasons for which he or she wishes to erase the personal data.

The Data Controller shall refuse the erasure request if a law obliges the Data Controller to continue to store the personal data. If the Controller is not under such an obligation, the Controller shall comply with the data subject's request within a maximum of 15 (fifteen) days and shall notify the data subject thereof by electronic or postal mail to the contact details provided by the data subject.

8.4. RIGHT TO OBJECT

Where the processing of data subjects' data is based on a legitimate interest, the data subject must be provided with adequate information about the processing and the right to object. This right shall be explicitly brought to the attention of the data subject at the latest at the time of the first contact with the data subject.

On this basis, the data subject shall have the right to object to the processing of his or her personal data and, in such a case, the Controller shall no longer process the personal data of the data subject unless it can be demonstrated that

the processing is justified by compelling legitimate grounds on the part of the controller which override the interests, rights and freedoms of the data subject, or

the processing relates to the establishment, exercise or defence of legal claims by the Controller.

8.5 RIGHT TO DATA PORTABILITY

The data subject shall have the right to receive personal data provided to the Data Controller in a structured, commonly used, machine-readable format and to transmit them to another Data Controller. If he or she so requests, ask for the direct transfer of personal data between controllers.

8.6 RIGHTS RELATED TO AUTOMATED DECISION-MAKING

Data subjects have the right not to be subject to automated decision-making, including profiling, which produces legal effects concerning them or similarly significantly affects them. The Data Controller does not use automated decision-making or profiling, however, if the data subject nevertheless experiences that he or she has been subject to automated decision-making and disagrees with the result of such decision-making, he or she should contact the Data Controller using one of the contact details provided in this Notice, including the Data Controller's contact details, and request a review of the decision.

9. REDRESS

Data subjects may lodge their objections or requests regarding the processing of their personal data by the Data Controller orally (in person) or in writing (in person or by means of a document delivered by another person or by post or e-mail) using one of the contact details indicated in point I. under the name of the Data Controller.

If the personal data controller finds that the Data Controller has infringed the provisions of the data protection legislation in relation to the processing of his/her personal data, he/she may lodge a request for redress with the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, postal address: 1530 Budapest, PO Box 5, www.naih.hu, telephone: +36 (1) 391-1400, fax: +36 (1) 391-1410,

e-mail: ugyfelszolgalat@naih.hu), and to the competent court of law at the place of the Data Controller's registered office, the Data Subject's place of residence or the place of stay.

10. COMPENSATION AND DAMAGES

If the Controller infringes the data subject's right to privacy by unlawfully processing his or her data or by breaching data security requirements, the data subject may claim damages from the Controller.

The Data Controller shall be liable to the data subject for any damage caused by the processor and the Data Controller shall also pay the data subject the damages due to the data subject in the event of a personal data breach caused by the processor. The controller shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that the damage or the infringement of the data subject's personality rights was caused by an unforeseeable cause outside the scope of the processing.

No compensation shall be due and no damages shall be payable where the damage or injury to the personality rights of the data subject was caused by the intentional or grossly negligent conduct of the data subject.

11. INFORMATION

The Data Subject shall have the right to obtain from the Data Controller information about the processing of his or her personal data and the exercise of his or her rights. The Data Controller hereby informs you that if you have a request concerning the processing of your personal data, you may request information (either orally or in writing) by using one of the contact details provided in point 1 of this Notice.

12. ENTRY INTO FORCE OF THIS PRIVACY NOTICE

The effective date of this Notice is 11 December 2023.

The Data Controller reserves the right to amend or update this Notice unilaterally without prior notice. Upon request, we will also send you the current version of this Notice by email.

Budapest, 11 December 2023.