

Data Processing and Privacy Policy

Thank you for choosing us! Comnica protects and respects your rights regarding your personal data.

For the above purpose, this Privacy Policy (hereinafter referred to as the "**Policy**") is in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council 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/EK (hereinafter referred to as the "**GDPR**").

This Policy contains information regarding the processing of personal data provided to us by our users (hereinafter referred to as the "**User**") in connection with the cloud-based telecommunications and customer relationship services offered by Comnica Kft.

Company name: Comnica Kft.

Registered address: H-1119 Budapest, Fehérvári út 99.

Business registration number: 01-09-895207

VAT number: 14242036-2-43

Registering court: Company Registry Court of Budapest – Capital Regional Court

Representative: Gábor Jeney

Email: info@comnica.com

Phone number: +36 1 255 0990

(hereinafter referred to as the "**Service Provider**")

The purpose of this Policy is to provide a clear understanding of why, how, and for how long we process the personal data of our Users who contact our company through our website or other channels.

This Privacy Policy shall be interpreted and applied within the legal framework of the Hungarian jurisdiction, in compliance with applicable national laws and the General Data Protection Regulation (GDPR). Any rights, obligations, or legal remedies arising from this document shall be governed by Hungarian data protection laws and relevant EU regulations. This English version is a translation of the original Hungarian text. In the event of any discrepancy between the Hungarian and English versions, the Hungarian version shall prevail as the official and legally binding text.

I. Some basic concepts related to data protection for understanding the Policy

Personal data

Any information relating to an identified or identifiable natural person ("**Data Subject**"). An identifiable natural person is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Data processing

Any operation or set of operations performed on personal data or data files, whether automated or non-automated, including collection, recording, organization, structuring, storage, transformation or alteration, retrieval, consultation, use, disclosure,

transmission, distribution, or other means of making accessible, alignment or combination, restriction, deletion, or destruction.

Data controller

The natural or legal person, public authority, agency, or any other body that determines the purposes and means of the processing of personal data, either alone or jointly with others. If the purposes and means of processing are determined by Union or Member State law, the data controller or the specific criteria for the designation of the data controller may also be determined by Union or Member State law.

The controller of your data is the Service Provider.

Data Processor

The natural or legal person, public authority, agency, or any other body that processes personal data on behalf of the data controller.

Third Party

The natural or legal person, public authority, agency, or any other body that is not the data subject, the data controller, the data processor, or persons who, under the direct authority of the data controller or the data processor, are authorized to process personal data.

Data Transfer

Making data accessible to a specified third party.

Data Subject

Anyone who shares their personal data with the Service Provider on the Website or elsewhere, or whose personal data is otherwise processed by the Service Provider. For example, you, the person reading this Policy.

Consent of the Data Subjects

A voluntary, specific, informed, and unambiguous indication of the data subject's wishes, given either by a statement or a clear affirmative action, which signifies their agreement to the processing of their personal data.

Sensitive Data

Personal data concerning racial or ethnic origin, political opinions or party affiliation, religious or philosophical beliefs, membership in a trade union, sexual life, health status, pathological addictions, and criminal convictions.

Genetic Data

Any personal data relating to the inherited or acquired genetic characteristics of a natural person, which provides unique information about the individual's physiology or health status, and which primarily results from the analysis of a biological sample taken from that person.

Biometric Data

Any personal data concerning the physical, physiological, or behavioral characteristics of a natural person, obtained through specific technical procedures, which allow or confirm the unique identification of that person. Examples include facial images or fingerprint data.

Data Breach

A security breach that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal data transmitted, stored, or otherwise processed.

Most of the above terms are also used in the GDPR. The full text of the GDPR is available at the following link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

The list is not exhaustive. If you require further information, please feel free to contact us.

We would like to inform you that during our data processing activities, we do not process special categories of data, genetic data, or biometric data, nor do we request such data from you.

II. Other Terms

User Website

The website accessible under the domain <https://comnica.com>, through which the User can register for and access the Service.

Website

The website accessible under the domain <https://comnica.com>, where visitors can find information about the Service Provider and the Service.

Service

Refers collectively to the customer services developed and operated by the Service Provider, including Comnica Contact Center, Comnica SmartSMS, Comnica Communications, Comnica Client Manager, and Comnica VideoCall, as well as the Comnica ID audited electronic communication tool and the related electronic legal declaration tool Comnica Sign, and other services, including telecommunications services, listed on the website.

User

For the purposes of this Policy, refers collectively to the visitor of the Website, the person requesting an offer or consultation from the Service Provider, the person subscribing to newsletters or other content, and the person using the Service (regardless of user level).

Registration

A process initiated on the User Website by providing certain personal data, during which the User creates a personal profile protected by a password.

III. In what cases do we process personal data?

The Service Provider processes the User's personal data in accordance with the principles set out in Article 5(1) of the GDPR in the following cases:

- Browsing the User Website / Website
- Requesting an offer through the Website
- Requesting a consultation
- Using the Service
- Customer service
- Newsletter subscription
- Registration for free professional content

- Billing
- Placing cookies on the User Website / Website

IV. What data do we process, for what purpose, and for how long?

In each of the above-defined cases, the legal basis for processing personal data may be:

- According to Article 6(1)(a) of the GDPR, the User's voluntary consent to the processing of personal data, based on proper information (hereinafter: "**Consent**");
- According to Article 6(1)(b) of the GDPR, the processing is necessary for the fulfillment of a contract to which the User, as the data subject, is a party (hereinafter: "**Contract fulfillment**");
- According to Article 6(1)(c) of the GDPR, the processing is necessary for compliance with a legal obligation to which the data controller is subject (hereinafter: "**Legal obligation compliance**");
- According to Article 6(1)(f) of the GDPR, the processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party (hereinafter: "**Legitimate interest**");

IV.1. Browsing

The scope of processed data	Purpose of data processing	Legal basis for data processing	Description of legitimate interest	Duration of data processing
The User's IP address	Protection of the Service Provider's IT systems, and ensuring the security of the User Website / Website	Legitimate interest	Safe operation of the Website and Service	30 days from the last visit

The User Website and the Website can be freely visited and browsed by the User without providing any personal data to the Service Provider. However, the use of the Service requires registration, during which personal data must be provided. When starting to use the User Website or the Website, the User sends a request from their computer or mobile device to the Service Provider. It is like sending a letter in which the User wishes to receive the content of the User Website or the Website as a response. However, the Service Provider can only respond to this request if the User provides their address. This address is the User's internet identification address, i.e., the IP address. The Service Provider's server sends the requested User Website or Website to this IP address. This is an automatic process, meaning that when the User enters the User Website or Website address in the browser or clicks on any link published on the Website, they consent to the provision of their IP address and its processing by the Service Provider.

In order for the communication between the Service Provider and the User, which is established when opening the User Website or Website as described above, to be seamless, the Service Provider's server stores the User's IP address in so-called log files.

The collection and storage of the IP address is necessary for the protection of the Service Provider's IT systems and the secure operation of the User Website and Website. Protection against potential malicious activities targeting the User Website or the Website is partially ensured by the Service Provider logging the operation of the User Website and Website, and listing the IP addresses from which requests are made to its servers in the log. If the Service Provider detects any activity from an IP address that disrupts the secure operation of the User Website or Website, it will place that address on a blacklist. Any malicious activity is handled and resolved through legal means with the help of this information. If no irregularities are detected, the Service Provider deletes the log files and the associated IP addresses. The IP addresses stored in the log files are not used for any purpose other than the one mentioned above, and are automatically deleted within 30 days, unless the IP address is associated with a prohibited activity carried out by the User. These activities may include any of those previously listed, or any other activity that violates local, state, national, or international laws.

IV.2. Request for an Offer

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's first and last name	Communication with the User regarding the request for an offer, conducting preliminary negotiations	Legitimate interest	Until the objection to data processing, or for 3 years from the receipt of the offer request, in order to reference our previous offer in future procedures
The User's email address	Communication with the User regarding the request for an offer	Legitimate interest	Until the objection to data processing, or for 3 years from the receipt of the offer request, in order to reference our previous offer in future procedures
The User's phone number	Communication with the User regarding the request for an offer	Legitimate interest	Until the objection to data processing, or for 3 years from the receipt of the offer request, in order to reference our previous offer in future procedures
The name of the company commissioning the User with the offer request	Communication with the User regarding the request for an offer	Legitimate interest	Until the objection to data processing, or for 3 years from the receipt of the offer request, in order to reference our

			previous offer in future procedures
The User's position at the company commissioning them with the offer request	Communication with the User regarding the request for an offer	Legitimate interest	Until the objection to data processing, or for 3 years from the receipt of the offer request, in order to reference our previous offer in future procedures

The User has the option to request an offer through the Website regarding the individual Services. For this, the provision of the above-mentioned personal data, as well as other data that does not qualify as personal data, is necessary.

IV.3. Consultation

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's first and last name	Communication with the User regarding the consultation	Contract fulfillment	Until the objection to data processing, or for up to 3 years after the consultation for quality assurance purposes
The User's email address	Communication with the User regarding the consultation	Contract fulfillment	Until the objection to data processing, or for up to 3 years after the consultation for quality assurance purposes
The User's phone number	Communication with the User regarding the consultation	Contract fulfillment	Until the objection to data processing, or for up to 3 years after the consultation for quality assurance purposes
The name of the company commissioning the User with the offer request	Communication with the User regarding the consultation	Contract fulfillment	Until the objection to data processing, or for up to 3 years after the consultation for quality assurance purposes

The User's position at the company commissioning them with the offer request	Communication with the User regarding the consultation	Contract fulfillment	Until the objection to data processing, or for up to 3 years after the consultation for quality assurance purposes
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IV.4. Registration

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's email address	User identification, creation of a user account	Contract fulfillment	Until the termination of the contract
The User's IP address	User identification	Contract fulfillment	Until the termination of the contract, or until the cancellation of the Registration

To register for the Service, the User only needs to provide their email address. This data is sufficient for the Service Provider to create the User's personal account. Our obligation under the GDPR also dictates that, apart from the User's email address, no other personal data should be requested during the registration process. As explained in section IV.1, the Service Provider automatically obtains the User's IP address. The purpose of processing the IP address related to the Registration is to ensure that the User who registers can be identified during the term of the contract.

IV.5. Using the Service

IV.5.1. In the case of customer service services (Comnica Contact Center, a Comnica SmartSMS, a Comnica Communications és a Comnica Client Manager, Comnica VideoCall, Comnica ID, Comnica Sign)

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's first and last name	User identification, creation of a user account	Contract fulfillment	Until the termination of the contract or until the User's deletion
The User's email address	User identification, creation of a user account	Contract fulfillment	Until the termination of the contract or until the User's deletion

The User's IP address	User identification	Contract fulfillment	Until the termination of the contract or until the User's deletion
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Due to the nature of the Service, the User who completes the Registration has the option to add additional Users with different access rights (administrator or operator) related to the use of the Service. During this process, it is necessary to record the personal data provided above so that the User can add the number of individually identifiable Users corresponding to their subscription level.

IV.5.2. A Comnica ID & Sign (audited electronic communication system and the associated solution for electronic statements and contract signing)

In the case of using Comnica ID & Sign services, depending on the type of service used by the User, the Service Provider may act in the role of Data Processor or Data Controller. In the case of customer verification under the Comnica ID (audited electronic communication tool), the Service Provider is considered a Data Processor, whereas in the case of the associated Comnica Sign service, which is used for electronic statements and contract signing, the Service Provider is considered the Data Controller.

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
Last name, first name, maiden name, gender, mother's maiden name, date and place of birth, nationality, email address, phone number, identification document type, identification document number, document expiration date, address card number	User's customer verification required for legal compliance, ensuring electronic statements or contract signing	Depending on the type of service used, the legal basis may be the User's prior, voluntary consent, contract fulfillment, or the legitimate interest of the data controller.	Depending on the service type, data processing lasts until data is transferred to the financial or other organization performing the customer verification or until the statutory obligation for the relevant service expires.
Photos, video recordings, and pictures taken during identification			
Photos of documents used for identification			

IV.6. Customer Service

In order to provide technical assistance to Users, the Service Provider maintains a Customer Support service. Customer support requests are handled via phone, email, or through a system developed by a third party, the JIRA Service Desk (hereinafter: "JIRA") application in its on-premise version. Both the automated call handling system for incoming calls to the phone number, the SMTP server for receiving emails, and the JIRA application operate exclusively on servers managed by us, ensuring that the data and information generated during customer support activities are not transmitted to any third party.

IV.6.1. In the case of email or JIRA-based inquiries:

If the User contacts Customer Service through any of the email addresses provided by the Service Provider (e.g., info@comnica.com, support@comnica.com) or via the web interface of the JIRA system, in order for the Service Provider to handle the customer support request with appropriate quality assurance, the following data processing is necessary, which is always accessed by the Service Provider from the central database of the JIRA system:

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's username	User identification, fulfilling customer service request	Contract fulfillment	Until the user objects to data processing, and for quality assurance purposes, until the resolution of the customer service request, until December 31 of the year following the year of the request.
The User's email address	User identification	Contract fulfillment	Until the user objects to data processing, and for quality assurance purposes, until the resolution of the customer service request, until December 31 of the year following the year of the request.
The User's first and last name (only if set in the Atlassian profile)	User identification	Contract fulfillment	Until the user objects to data processing, and for quality assurance purposes, until the resolution of the customer service request, until

			December 31 of the year following the year of the request.
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IV.6.2. In case of phone inquiries:

If the User contacts our Customer Service by phone, or if our Customer Service calls the User back, we will inform the User at the beginning of the phone conversation that, for quality assurance purposes and in order for the Service Provider to fulfill the customer support request, the following data will be processed. If the User does not wish to have their voice recorded, they are asked to contact us by email or via the JIRA system.

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's voice recording	User identification, fulfilling customer service, quality assurance	Contract fulfillment	Until the user objects to data processing, and for quality assurance purposes, until the resolution of the customer service request, until December 31 of the year following the year of the request.
The User's email address	User identification, fulfilling customer service	Contract fulfillment	Until the user objects to data processing, and for quality assurance purposes, until the resolution of the customer service request, until December 31 of the year following the year of the request.
The User's phone number	User identification, fulfilling customer service	Contract fulfillment	Until the user objects to data processing, and for quality assurance purposes, until the resolution of the customer service request, until December 31 of the year following the year of the request.

IV.7. Newsletter subscription

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's email address	Sending informational, educational, or content related to the Service Provider	Consent	Until the consent is withdrawn, i.e., until the user unsubscribes from the newsletter
The User's first and last name	Sending informational, educational, or content related to the Service Provider	Consent	Until the consent is withdrawn, i.e., until the user unsubscribes from the newsletter
The User's position at the company they represent	Sending relevant informational, educational, or content related to the Service Provider	Consent	Until the consent is withdrawn, i.e., until the user unsubscribes from the newsletter
The name of the company represented by the User	Sending relevant informational, educational, or content related to the Service Provider	Consent	Until the consent is withdrawn, i.e., until the user unsubscribes from the newsletter

The User has the opportunity to subscribe to our newsletter at several places on the Website (for example, request for a quote, request for a consultation). In connection with this, the Service Provider only processes the User's email address, first and last name, the name of the company they represent, and their position there based on the User's explicit consent, until the User withdraws the consent. The purpose of processing the above data is for the Service Provider to create and send truly relevant newsletter content to the Users, with the company name and position providing important guidelines. The consent can be withdrawn in several ways; for more details, please refer to Section VI of this Policy.

IV.8. Billing

IV.8.1. If an invoice for the payment for the use of the Service is issued to a legal entity, the Service Provider processes the following personal data.

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The email address of the person designated by the User for communication	Communication with the User regarding billing	Legal obligation compliance	Until the termination of the contract or until the User requests deletion (anonymization)

The Service Provider processes the above-mentioned data as personal data only if the email address designated for communication contains the name of a natural person. If the provided communication email address is in a generic format (e.g., info@example.hu or finance@example.hu), the Service Provider processes the data, but it is not considered personal data. The Service Provider draws the User's attention to the fact that if the communication email address contains the name of a natural person, it is the User's responsibility to obtain consent from the person designated for communication.

IV.8.2. If an invoice for the payment for the use of the Service is issued to a natural person, the Service Provider processes the following personal data.

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's first and last name	Recording data that must be included in the issued invoice as required by law	Legal obligation compliance	For the 8-year period defined in Section 169 (2) of Act C of 2000 on Accounting
The User's address	Recording data that must be included in the issued invoice as required by law	Legal obligation compliance	For the 8-year period defined in Section 169 (2) of Act C of 2000 on Accounting
The User's tax identification number	Recording data that must be included in the issued invoice as required by law	Legal obligation compliance	For the 8-year period defined in Section 169 (2) of Act C of 2000 on Accounting
The User's email address	Contacting the User regarding billing	Legal obligation compliance	Until the termination of the contract or the User's deletion

The mandatory contents of the invoice and the duration for storing the invoice are stipulated by law, so the Service Provider processes this data to comply with legal obligations.

IV. 9. Registration for Free Professional Content

The User has the opportunity to download professional content (research materials, white papers, checklists, or educational content) prepared, edited, and provided free of charge by the Service Provider, and to subscribe for access to further similar materials at several locations on the Website. In connection with this, the Service Provider processes the User's email address, first and last name, the name of the company represented by the User, and their position within the company solely based on the User's explicit consent, until the User withdraws this consent. The purpose of processing the above data is to allow the Service Provider to create and provide the User with truly relevant professional content, for which the company name and position provide important guidance. The consent can be withdrawn in several ways; for further details, please refer to point VI of this Privacy Policy.

The scope of processed data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The User's email address	Providing access to further free professional content or sending such content	Consent	Until the consent is withdrawn, i.e., until unsubscribing from the professional content
The User's first and last name	Providing access to further free professional content or sending such content	Consent	Until the consent is withdrawn, i.e., until unsubscribing from the professional content
The User's position at the company they represent	Providing access to further truly relevant free professional content or sending such content	Consent	Until the consent is withdrawn, i.e., until unsubscribing from the professional content
The name of the company represented by the User	Providing access to further truly relevant free professional content or sending such content	Consent	Until the consent is withdrawn, i.e., until unsubscribing from the professional content

V. What is a cookie and why do we use it?

A cookie is a data packet sent from the web server to your computer when you visit our website, and it is stored there for a specific period of time depending on the type of cookie.

Cookies do not pose any security risk to your computer and do not cause operational disruptions.

In order to ensure the smooth functioning of the User Website and the Website, certain cookies (known as session cookies) are automatically installed on your computer upon visiting the User Website or the Website. The purpose of these cookies is to guarantee the security of the User Website and the Website, to preserve data entered in our online forms, to display multimedia content, and to balance the load on the User Website and the Website. Personal data collected through the use of these cookies (especially the IP address of your computer) are processed based on our [legitimate interest](#) in ensuring the secure and seamless operation of the User Website and the Website, and for no longer than the time you stay on our website. These cookies are automatically deleted from your computer when you close your browser.

Based on your [consent](#) given on the User Website and the Website, the following types of cookies may be installed on your computer for the purposes outlined below:

- Statistical cookies for web analytics measurements (e.g., Google Analytics). These are important to us because they help us gather information about certain characteristics

of our visitors (such as their IP address, city, the type of device, browser, and operating system they use, and which subpages of our website they visited and how much time they spent on them). We use the anonymous data to create general statistics and reports about the traffic on the User Website and the Website, which we use to improve the website and refine our marketing strategy.

- Remarketing cookies (e.g., Google Ads), which allow us to analyze how you use our website and, based on this information, display personalized content or advertisements to you, even on other online platforms outside of our website (e.g., on other websites or social media).

Furthermore, we distinguish between session cookies and persistent cookies. A session cookie lasts only as long as the user has the browser open. Persistent cookies live longer and are not automatically deleted when the browser is closed. Persistent cookies help the website function more quickly and remember settings that the user has configured on the User Website and the Website.

You can withdraw your consent at any time, free of charge and without restrictions, by revisiting the User Website and the Website – clicking on the pop-up window when the site loads.

Cookies can also be managed through your browser settings. The method for doing this depends on the type of browser you use.

For the most popular browsers, you can find information on cookie settings at the following links:

- Google Chrome: https://support.google.com/chrome/answer/95647?hl=en&p=cpn_cookies
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Internet Explorer: <https://support.microsoft.com/en-us/windows/manage-cookies-in-microsoft-edge-view-allow-block-delete-and-use-168dab11-0753-043d-7c16-ed5947fc64d>
- Safari: <https://support.apple.com/en-us/105082>

If you would like to know exactly which cookies the Service Provider uses, please click on the links to the Providers above.

VI. How can you withdraw your consent in the case of consent-based data processing?

If, according to this Privacy Policy, the legal basis for data processing is the consent of the data subject, i.e., the User, the User has the right to withdraw their consent. The withdrawal of consent may occur in different ways, depending on the specific data processing purposes. You can withdraw your consent provided during browsing by revisiting the Website—by clicking on the pop-up window that appears when the Website is loaded—at any time, free of charge, and without restrictions. Furthermore, if there is no possibility to withdraw consent in the manner mentioned above, you may withdraw your consent by sending a message to the email address adatvedelem@comnica.com, or by sending a letter to the Service Provider's registered office address. In the case of newsletter subscription, you can also withdraw your consent by clicking the "Unsubscribe" button at the bottom of the email.

Please note that withdrawing your consent does not affect the lawfulness of data processing before the withdrawal.

VII. Where and how do we store your personal data?

All personal data is stored electronically on our own, securely protected servers. All of our servers are located within the European Union, and personal data stored on them—except for the exceptions specified in this Policy—cannot be accessed from outside the EU.

The Service Provider ensures data protection on multiple levels (physical, technical, and organizational). For example, the servers are stored in a secured location monitored by security guards and technicians 24 hours a day, 365 days a year. The access to server rooms is restricted among employees, and access to data is limited according to internal regulations. Biometric access control systems are used for entry, uninterruptible power supplies are employed to protect against power outages, firewalls are in place to protect the servers, and encryption is used in case of any data transmission from the servers.

Additionally, the Service Provider holds an ISO/IEC 27001 certification for data security compliance from the International Organization for Standardization (ISO).

Despite the above, the Service Provider is not responsible for any damage, destruction, or unauthorized access to data in the event of technical failures, natural disasters, terrorism, or criminal activities.

VIII. What rights can you exercise regarding your personal data?

Request for Information (Right of Access): You may request information from us at any time regarding the processing of your personal data – in person at our registered office address, in writing, by sending a registered or return receipt letter to our registered office address, or via email to the address adatvedelem@comnica.com.

Under Article 15(1) of the GDPR, the request for information may include details about the processed data, its source, the purpose of processing, the legal basis for processing, the duration, the names and addresses of any data processors, the activities related to data processing, and the rights you are entitled to in relation to the processing. In the case of data transfers, it includes information on who has received or will receive your data and for what purpose.

We consider the request for information valid if you can be clearly identified based on the request. If the request is made via email or mail, we will only consider emails sent from the email address registered with us as valid, and we can only send information to the postal address we have on record. Unless you voluntarily verify your identity differently, we cannot send information to an email or postal address not registered with us, in order to ensure the security of your data.

Rectification: In the manner described above for a request for information, you may request the correction, modification, or supplementation of your data at any time. We can only fulfill this request based on a request originating from a verified source as presented in the request for information.

Restriction: You may request that the processing of your personal data be restricted, particularly in the following cases:

- a) You dispute the accuracy of the personal data being processed. In this case, the restriction applies for the period during which we verify the accuracy of the data.
- b) The legal basis for processing your data has expired, but you request its restricted retention for the purpose of submitting, asserting, or defending any legal claims.

Objection: If we process your personal data based on legitimate interests as described in this policy, you may object to the processing of your personal data at any time. In such a case, we will examine the legality of your objection, and if we find it to be valid, we will cease processing your data. We will also notify those who may have previously received your personal data, in connection with the objection.

Erasure (“Right to be Forgotten”): If any of the grounds specified in GDPR Article 17(1) apply, you may request the erasure of your personal data at any time. We may refuse to erase the data if the processing is required by law, or if the data is necessary for the establishment, exercise, or defense of legal claims. In case of refusal, we will inform you accordingly. Once deleted, the data cannot be restored.

Data Portability: You may request us to provide your personal data that we process in a structured, commonly used, and machine-readable format, or to transfer that data to another data controller at any time.

We ask you not to exercise the rights listed above for improper purposes, but only when there is a valid reason or when one of the conditions defined in the GDPR genuinely applies.

IX. To whom do we transfer, and who can access your personal data?

We handle your personal data confidentially and do not disclose it to third parties, except as outlined below.

IX.1. Data transfer related to sending newsletters and system messages

If you are registered and/or subscribed to our newsletter, we will forward your email address to our data processing partner. One such data processor is MailerLite, an email sending service provider, through which we manage the distribution of our system messages, eDMs, and newsletters related to the operation of the Service.

MailerLite may not use the email address for any purpose other than fulfilling its task and may not make independent decisions regarding personal data.

The contact details of the data processor:

Name: MailerLite Limited
Address: 38 Mount Street Upper, Dublin 2, D02 PR89 Ireland
Email: info@mailerlite.com
Represented by: Ignas Rubezius Managing Director
(hereinafter referred to as “**MailerLite**”)

The privacy policy of MailerLite can be read here:
<https://www.mailerlite.com/legal/privacy-policy>

IX.2. Data transfer related to the customer due diligence process with human verification

If you are a person required to undergo customer due diligence in relation to financial services offered by Trive Bank Hungary Zrt. (H-1134 Budapest, Váci út 33.; company reg. number: 01-10-142205), then the customer due diligence process with human verification, carried out through the "Comnica ID" audited electronic communication tool, will involve the following data processor:

Name: Anderson Group Hungary Kft.
Address: H-7621 Pécs, Apáca utca 3.
Phone: +36 (72) 999 222
Represented by: Zoltán Teszárík Managing Director
(hereinafter referred to as "**Anderson Group**")

Anderson Group uses the Comnica system to carry out the human verification. During data processing, the data does not leave the Comnica system, so Anderson Group does not have access to the data, and no data storage takes place at Anderson Group.

IX.3. Data transfer related to services supporting the advanced technological solutions of the customer due diligence system (OCR, AI)

When applying solutions for the advanced analysis of audiovisual elements available in the customer due diligence system, the resulting audiovisual content is transferred to our data processing partner.

The Service Provider utilizes AI-based and other services from Microsoft Azure environment for certain functions of the system that can be used for the advanced analysis of audiovisual elements, during which some audiovisual content is transferred to our data processing partner. The Microsoft Azure environment complies with all security standards and regulations required in the EU and Hungary for financial institutions. The certifications can be accessed via the following link:
<https://learn.microsoft.com/en-us/azure/compliance/>

Name: Microsoft Magyarország Kft.
Address: 1031 Budapest, Graphisoft Park 3.
Phone: 06-1-267-46-36
Represented by: Benjamin Orndorff
(hereinafter referred to as: "**Microsoft**")

The Service Provider does not store data in the Microsoft Azure environment; after using the individual functions, the data is deleted.

X. Which external service providers' social media plugins may you encounter on our website?

On our website, we use social media plugins from external service providers for feedback on our content and for sharing our content on social media platforms. The plugins are only activated when you explicitly click on the corresponding button, thereby allowing the plugin to establish a connection with the social media platform. On our website, you will find plugins from the following two social media platforms: Facebook and LinkedIn.

If you are logged into any of these social media accounts during browsing, it is possible that the respective social media platform associates your visit with your social media account. If you click the appropriate button, your browser will transmit the relevant information directly to the respective social media platform, which will store it there. More details:

a) **Facebook:** While browsing our website, a direct data connection is established between your browser and Facebook's servers through the embedded modules. This allows Facebook to access the information that your IP address visited our website. If you use these plugins (e.g., click on the Like, Share buttons or write a comment, etc.) while logged into your Facebook account, the relevant content from the website will be linked to your Facebook profile. In this case, Facebook associates your activities on the website with your Facebook user account.

b) **LinkedIn:** The service provider's server records data about your activity on our website and associates this data with your LinkedIn account. When you use the LinkedIn share button, these data are made accessible to LinkedIn's user base and may be disclosed publicly.

Information about the scope and purpose of data collection, further processing and use of your data by Facebook/LinkedIn, as well as your rights regarding the protection of your personal data and settings, can be found in the Facebook/LinkedIn privacy policies, which are available at the following links:

<https://www.facebook.com/policy.php>

<https://www.linkedin.com/legal/privacy-policy>

XI. Who and under what circumstances are we required to disclose personal data?

We are required to disclose the personal data we process to the competent authorities upon official request. In such cases of data transfer and any resulting consequences, our company is not liable. We will always inform you about any data transfer.

XII. What liabilities may arise in connection with the provided personal data?

When you provide us with personal data, you take responsibility for ensuring that the data and consents come from you and are accurate.

Please only provide third-party data if you have explicitly received authorization from that third party to do so. Our company is not responsible for any potential claims arising from this.

If a third party credibly objects to the data processing, we will immediately delete the personal data without informing you separately. Third-party personal data should only be provided if you have informed the third party about the availability of this policy.

XIII. Handling of Data Protection Incidents

In the event of a data protection incident, we will report it to the supervisory authority within 72 hours of becoming aware of it, in accordance with legal requirements, and we will also maintain a record of such incidents. In cases specified by law, we will also inform the affected Users.

XIV. Modification of the Privacy Policy

If the scope of the processed data, the legal basis for processing, or other circumstances change, we will amend this Policy in accordance with the provisions of the GDPR within 30 days and publish the updated version on the Website. We will also notify the User about the changes. Please carefully review any modifications to the privacy policy as they contain important information regarding the processing of your personal data.

XV. Who can you contact for questions related to your personal data or to exercise your rights?

For any questions, please contact us at info@comnica.com, by phone at +36-1-255-0990, or by post at H-1119 Budapest, Fehérvári út 99.

The name and contact details of the Data Protection Officer:
Vidra Zsolt
Email: adatvedelem@comnica.com

The User is entitled to exercise their rights regarding the processing of their personal data with the Service Provider, as the data controller. If the User wishes to exercise their rights, they must primarily notify the Service Provider.

In case of a violation of their rights, the User can file a complaint with the National Authority for Data Protection and Freedom of Information:

Name: Hungarian National Authority for Data Protection and Freedom of Information
Registered seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Postal address: H-1530 Budapest, Pf.: 5.
Phone: +3613911400
Email: ugyfelszolgalat@naih.hu
Website: <http://www.naih.hu>