

PRIVACY POLICY

“3P Solutions” Kft. in the context of the Company’s business activities

I. INTRODUCTION

In the course of its commercial and business activities, **“3P Solutions” Kft.** (company registration number: 01-09-700895, registered seat: H-1146 Budapest, Hermina út 17., hereinafter referred to as the **“Company”**) pays special attention to the protection of personal and other data it handles (processes). The purpose of this Privacy Policy (hereinafter referred to as the **“Policy”**) is to provide our customers/partners with accurate and transparent information about our data processing activities in connection with our own operations within the legal context of data processing.

II. DATA CONTROLLER AND ITS CONTRACT DETAILS:

Company name: **“3P Solutions” Kft.**
Company registration number: **01-09-700895**
Court of registration: **Company Registry Court of the Tribunal Court of Budapest**
Registered seat: **H-1146 Budapest, Hermina út 17.**
E-mail: **office@3psolutions.hu**
Telephone: **+36 (1) 463 0402**
Website: **www.3psolutions.de**

No Data Protection Officer has been appointed for our companies.

III. DESCRIPTION OF OUR DATA PROCESSING OPERATIONS

(A) CONTACTS AND INQUIRIES AT THE CONTACT DETAILS PROVIDED AT THE WEBSITE (E-MAIL, TELEPHONE)

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING	SCOPE OF DATA PROCESSING	DURATION OF DATA PROCESSING
The purpose of data processing related to contacts and inquiries is to be able to answer questions raised by inquiring (affected) parties via e-mail or telephone.	In accordance with Subsection (a) of Section (1) of Article 6 of the GDPR, the legal basis for data processing is your consent, which you give us by contacting us.	<ul style="list-style-type: none">• last name / first name, for identification;• telephone number for returning a call;• e-mail, address to receive a reply;• any personal information that may be provided in your message or any information that may be associated with you;	Data processing lasts until the conclusion of the contact or inquiry, but no later than until the question is answered. After that, we will not perform any data processing operation, however, we will archive your e-mail message in our e-mailbox.
DATA SUBJECTS		Those inquiring about in our activities and services.	
RECIPIENTS WITHIN THE COMPANY’S ORGANIZATION		<ul style="list-style-type: none">• general manager and managing director of our Company;• our employees who make statements on the merits in response to the questions raised by the inquiring party;	
RECIPIENTS OUTSIDE THE COMPANY’S ORGANIZATION		The personal data of the inquiring party and any information that may be associated with the inquiring party will not be transmitted, however it may be disclosed to the IT service provider who is at the same time not allowed to perform any data processing operation.	
PLACE AND FORM OF DATA STORAGE		We will store your personal data on our server and e-mailboxes. Telephone conversations are not recorded.	

(B) REQUEST FOR QUOTATIONS

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING	SCOPE OF DATA PROCESSING	DURATION OF DATA PROCESSING
You can contact us by phone / e-mail and in person before	The processing of personal information or any information	<ul style="list-style-type: none">• last name / first name – for identification,	The duration of data processing corresponds to the

<p>placing an order with the aim of inquiring about our products or requesting quotations.</p> <p>Our data processing goal in association with the preparation of individual price quotations is to create a product package that meets the individual needs of the inquiring person.</p>	<p>that may be associated with you is justified by the steps leading to the conclusion of a contract in accordance with Subsection (b) of Section (1) of Article 6 of the GDPR.</p> <p>Once the binding nature of the quotation expires, in case you or your company does not accept our quotation, or there is no response to it, our further data processing operations are based on our legitimate interest in accordance with Subsection (f) of Section (1) of Article 6 of the GDPR.</p> <p>It is in our legitimate interest to be able to make an updated and customized quotation for you and your company should you contact us again in the future.</p>	<p>contact, form of address for maintaining contacts</p> <ul style="list-style-type: none"> • e-mail address – for maintaining contacts • any personal information that might have been provided when you contacted us or any information that may be associated with you; 	<p>duration of the binding nature of our quotation, which is shown in the quotation sent by us.</p> <p>After the expiry of the validity of our quotation, if no contract is concluded between us, we will archive the personal data of the inquiring person and the data that can be associated with the inquiring person for 5 (five) years, but we will not perform any additional active data processing operation.</p>
DATA SUBJECTS		The inquiring person	
RECIPIENTS WITHIN THE COMPANY'S ORGANIZATION		<ul style="list-style-type: none"> • general manager and managing director of our Company; • our employees who sell the Company's products and/or make the quotation; 	
RECIPIENTS OUTSIDE THE COMPANY'S ORGANIZATION		The personal data of the inquiring person and any information that may be associated with the inquiring person will not be transmitted, however it may be disclosed to the IT service provider who is not allowed to perform any data processing operation.	
PLACE AND FORM OF DATA STORAGE		In connection with your request for quotations, the above personal information or any information that may be associated with you will be stored in digital format, in the dedicated subfolder kept in our own server and e-mailbox.	

(C) DATA PROCESSING IN RELATION TO CONTRACTING FOR OUR PRIVATE ENTREPRENEUR PARTNERS (SUBCONTRACTORS) / CUSTOMERS

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING	SCOPE OF DATA PROCESSING	DURATION OF DATA PROCESSING
<p>If you, as a private entrepreneur enter into a contract with us, we will record (in writing) the personal data that may be necessary for the conclusion of the contract and any information that may be associated with you to ensure that the contract is performed by both parties.</p>	<p>Pursuant to Subsection (b) of Section (1) of Article 6 of the GDPR, data processing is necessary for the performance of the contract.</p> <p>Our further data processing of your personal information or any information that may be associated with you after the termination of the contract for any reason is based on our legitimate interest in accordance with Subsection (f) of Section (1) of Article 6 of the GDPR.</p> <p>It is in our legitimate interest to provide for the enforcement of contract-related claims. Moreover, if the contract concluded with you becomes part of the tender material of our Company chosen as the preferred bidder, it is in our legitimate interest to comply</p>	<ul style="list-style-type: none"> • last name / first name • address • registration number • tax number • phone number • e-mail address 	<p>Data related to contracting is processed until the expiry of the limitation period of 5 years from the expiry/termination of the contract (limitation period under civil law).</p>

	with the tender requirements.		
DATA SUBJECTS	Our partners, customers entering into a contractual relationship with us.		
RECIPIENTS WITHIN THE COMPANY'S ORGANIZATION	<ul style="list-style-type: none"> • general manager or managing director of the Company; • the Company's employee(s) in charge of administrative affairs; • the Company's employee(s) in charge of sales; • the Company's employee performing accounting/bookkeeping tasks; 		
RECIPIENTS OUTSIDE THE COMPANY'S ORGANIZATION	<ul style="list-style-type: none"> • appointed auditors / auditors conducting audits; • collaborating law firm on an exceptional basis; • authorities, courts on an exceptional basis; • hired IT service provider on an exceptional basis; 		
PLACE AND FORM OF DATA STORAGE	Personal information and any information that may be associated with you are stored in hardcopy format, in our archives, as well as separately, in digital format, in our customer folders kept in our own server.		

(D) DATA PROCESSING IN RELATION TO CONTRACTING FOR OUR BUSINESS PARTNERS (SUBCONTRACTORS) / CUSTOMERS

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING	SCOPE OF DATA PROCESSING	DURATION OF DATA PROCESSING
If our Company enters into contracts with companies, in our contracts we may include in writing the personal data of natural persons acting on behalf of the partner and/or the customer (senior officers, employees or agents), as well as any data that may be associated with them (such as e-mail addresses or telephone numbers).	<p>Pursuant to Subsection (b) of Section (1) of Article 6 of the GDPR, data processing is necessary for the performance of the contract.</p> <p>Our further processing of your personal information or any information that may be associated with you after the termination of the contract for any reason is based on our legitimate interest in accordance with Subsection (f) of Section (1) of Article 6 of the GDPR.</p> <p>It is in our legitimate interest to provide for the enforcement of contract-related claims. Moreover, if the contract concluded with our partner/customer becomes part of the tender material of our Company chosen as the preferred bidder, it is in our legitimate interest to comply with the tender requirements.</p>	<ul style="list-style-type: none"> • last name / first name; • phone number; • e-mail address; 	Data related to contracting is processed until the expiry of the limitation period of 5 years from the expiry/termination of the contract (limitation period under civil law).
DATA SUBJECTS	Natural persons acting on behalf of our partners/customers.		
RECIPIENTS WITHIN THE COMPANY'S ORGANIZATION	<ul style="list-style-type: none"> • general manager / managing director of the Company; • the Company's employee(s) in charge of administrative affairs; • the Company's employee(s) in charge of sales; • the Company's employee performing accounting/bookkeeping tasks; 		
RECIPIENTS OUTSIDE THE COMPANY'S ORGANIZATION	<ul style="list-style-type: none"> • appointed auditors / auditors conducting audits; • collaborating law firm on an exceptional basis; • authorities, courts on an exceptional basis; • hired IT service provider on an exceptional basis; 		
PLACE AND FORM OF DATA STORAGE	Personal information and any information that may be associated with you are stored in hardcopy format, in our archives, as well as separately, in digital format, in our customer folders kept in our		

	own server.
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(E) INVOICING

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING	SCOPE OF DATA PROCESSING	DURATION OF DATA PROCESSING
<p>In the case of private entrepreneur partners/customers, the purpose of data processing is to fulfill our obligation to issue invoices and retain accounting documents in accordance with the law.</p> <p>Pursuant to Sections (1)–(2) of Article 169 of the Accounting Act, the accounting documents directly or indirectly supporting accounting operations will be retained. Pursuant to Section (1) of Article 159 of the Act CXXVII of 2007 on value-added tax, the issuance of an invoice is a statutory requirement.</p>	<p>The legal basis for data processing is compliance with the statutory obligation set out in Subsection c) of Section (1) of Article 6 of the GDPR.</p>	<ul style="list-style-type: none"> last name / first name – their indication in the invoice is a statutory obligation; address / invoicing address – their indication in the invoice is a statutory obligation; description of the service – its indication in the invoice is a statutory obligation; 	<p>Invoicing data will be handled for 8 years following the date of issue of the relevant invoice. Pursuant to Section (2) of Article 169 of the Accounting Act, invoices will be retained at least for minimum 8 years.</p>
DATA SUBJECTS		Our private entrepreneur partners.	
RECIPIENTS WITHIN THE COMPANY'S ORGANIZATION		<ul style="list-style-type: none"> general manager / managing director of the Company; the Company's employee(s) in charge of administrative affairs; the Company's employee(s) in charge of sales; the Company's employee performing accounting/bookkeeping tasks; 	
RECIPIENTS OUTSIDE THE COMPANY'S ORGANIZATION		<ul style="list-style-type: none"> hired accounting firm appointed auditors / auditors conducting audits; collaborating law firm on an exceptional basis; authorities, courts on an exceptional basis; hired IT service provider on an exceptional basis; 	
PLACE AND FORM OF DATA STORAGE		Personal information shown in invoices and any information that may be associated with you are stored in hardcopy format, in our archives, as well as separately, in digital format, in our own servers.	

(F) PROCESSING OF CONTACT DETAILS

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING	SCOPE OF DATA PROCESSING	DURATION OF DATA PROCESSING
<p>When concluding a contract with our partners (subcontractors), our customers – in addition to the personal data of the senior official/authorized representative – the so-called contact details may also be indicated in the contract in order to make communication and cooperation smoother and more efficient.</p>	<p>The legal basis for our data processing is our legitimate interest under Subsection (f) of Section (1) of Article 6 of the GDPR.</p> <p>It is in our legitimate interest to ensure fast and efficient cooperation.</p>	<ul style="list-style-type: none"> name; phone number; e-mail address; 	<p>Data related to contracting is processed until the expiry of the limitation period of 5 years from the expiry/termination of the contract (limitation period under civil law).</p>
DATA SUBJECTS		The natural persons named as contact persons in the contracts concluded by us.	
RECIPIENTS WITHIN THE COMPANY'S ORGANIZATION		<ul style="list-style-type: none"> General manager / managing director of the Company; The Company's employee/employees in charge of administrative affairs; The Company's employee/employees in charge of sales; The Company's employee performing accounting / bookkeeping tasks; 	

RECIPIENTS OUTSIDE THE COMPANY'S ORGANIZATION	<ul style="list-style-type: none"> • appointed auditors / auditors conducting audits; • collaborating law firm on an exceptional basis, • authorities, courts on an exceptional basis; • hired IT service provider on an exceptional basis;
PLACE AND FORM OF DATA STORAGE	Personal information of the contact person or any information that may be associated with the contact person are stored in hardcopy format, in our archives, as well as separately in digital format, in our customer folders kept in our own server.

It is necessary to provide the above personal information or any information that may be associated with you because in the absence of this data – with the exception of the contact details – we cannot enter into a contract with you, or satisfy your demands. No automated decision-making and profiling are applied. Should these procedures referenced herein be applicable, you will be informed accordingly before the commencement of the process.

IV. DATA TRANSFER TO THIRD COUNTRIES

Please note that based on the general data processing practice of the Company your data may be transferred to other EU Member States and third countries outside the EU for the purpose of the consummation of transactions, conclusion of contracts and performance of contracts. Prior to the given data processing operation, the employee concerned will be informed of the possible data transfer. In accordance with the relevant legal regulations, we may transfer your data to third countries in the following cases (international data transfer):

- on the basis of an adequacy decision (Article 45 of the GDPR) – where the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organization in question ensures an adequate level of protection. Such a transfer does not require any specific authorization. More information: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_hu
- subject to appropriate safeguards (Article 46 of the GDPR) – in the absence of an adequacy decision, the transfer may only take place to a third country or to an international organization if the controller or processor in the third country has provided appropriate safeguards (Section (2) of Article 45 of the GDPR), and on condition that enforceable data subject rights and effective legal remedies for data subjects are available. More information: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_hu
- with the consent of the data subject – in the absence of a so-called adequacy decision, or if the third country concerned cannot provide an appropriate safeguard.

V. OUR DATA PROCESSING RECIPIENTS

With regards to certain data processing operations, we rely on the services of data processors on the basis of written agreements made with these data processors. The rights and obligations of our data processors with respect to the processing of personal data are regulated in the GDRP, the Information Act, sectoral legislation on data processing and the provisions that are set out in the agreements concluded with our data processors. Data processors may not make any substantial decision that would affect the data processing, may process all personal data disclosed to them pursuant to our instructions, and they may not perform data processing for their own purposes. A list of our data processors is available on request.

VI. DATA SECURITY MEASURES

Please note that we have implemented appropriate technical and organizational measures for ensuring that your personal data is adequately protected, in particular in accordance with the principles of the GDPR and the Information Act. We protect personal and other data with reliance on appropriate measures against alteration, corruption, unauthorized public disclosure or unauthorized access. Our IT system is protected by firewalls and antivirus software, and documents containing personal data are stored in filing cabinets. We

make all reasonable efforts to delete all information unduly disclosed to us, and ensure that such information will not be transferred to other parties, and will not be used by them either.

VII. RIGHTS OF DATA SUBJECTS

1 RIGHT OF ACCESS

You may request information on the processing of your personal data at any time, in relation to the followings:

- purpose of the processing of your personal data;
- your personal data involved in data processing;
- how long your personal data will be stored;
- who can access to the personal data you have provided to us;
- how long we will store your personal data;
- your rights;
- the right to lodge a complaint;
- from what sources we have your personal data;

Your request for information will be fulfilled free of charges, as soon as possible after the receipt of the request, but no later than within 30 (thirty) days. If your request is found to be ungrounded or excessive (due to its repetitive nature), we may claim the administrative expenses associated with the fulfillment of your request from you, or refuse to taken any action that may be necessary on the basis of your request. If due to the nature and scope of the request or our own workload, we are unable to comply with the request within the given time limit, we will notify you of the reasons for the delay or failure to take action, and we will inform you of your right to lodge a complaint and your right to legal remedies.

2 RIGHT TO RECTIFICATION

You may request the modification of your personal data we are handling. Your request will be fulfilled free of charges, as soon as possible after receipt, but no later than within 30 (thirty) days. If your request is found to be ungrounded or excessive (due to its repetitive nature), we may claim the administrative expenses associated with the fulfillment of your request from you, or refuse to taken any action that may be necessary on the basis of your request. If due to the nature and scope of the request or our own workload, we are unable to comply with the request within the given time limit, we will notify you of the reasons for the delay or failure to take action, and we will inform you of your right to lodge a complaint and your right to legal remedies.

3 RIGHT TO ERASURE/TO BE FORGOTTEN

You may request that your personal information be erased without undue delay, in the following cases:

- your personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- if the processing of the data is based upon your consent, and you have withdrawn your consent and there is no other legal basis for data processing;
- you object to the processing, and there is no other legal basis for data processing;
- your personal data has been unlawfully processed by the Company;
- the personal data has to be erased for compliance with statutory obligations;

Please note that your personal information cannot be erased in the following cases:

- if processing is required for our Company to comply with a statutory obligation;
- if the processing of your personal data is based on the legitimate interest of the Company.

Your request will be fulfilled free of charges, as soon as possible after receipt, without delay, but no later than within 30 (thirty) days. If your request is found to be ungrounded or excessive (due to its repetitive nature), we may claim the administrative expenses associated with the fulfillment of your

request from you, or refuse to taken any action that may be necessary on the basis of your request. If due to the nature and scope of the request or our own workload, we are unable to comply with the request within the given time limit, we will notify you of the reasons for the delay or failure to take action, and we will inform you of your right to lodge a complaint and your right to legal remedies.

4 RIGHT TO RESTRICT PROCESSING

You may request that we restrict the processing of your personal data processed by us in the following cases:

- You dispute in writing or by e-mail the accuracy of the personal information we are handling. In this case, restriction (blocking) is valid for the period necessary to verify the accuracy of your information.
- If contrary to all probability the processing of your personal data by our Company proves to be unlawful, but you do not request, that is you rather object to the erasure of your personal data, while requesting the restriction of its use until the lawfulness of processing is restored.
- If we inform you that we no longer need your personal information for data processing purposes, but instead of deleting it you require that it should be restricted for the possible future enforcement of claims.
- If you have objected to data processing, we restrict data processing for the period necessary to verify the lawfulness of your objection.

Where processing has been restricted (blocked) based on the foregoing, such personal data can – with the exception of storage – be processed:

- with your consent, or
- for the purpose of legal interests, enforcement of claims, protection of interests
- for the protection of the rights of another natural or legal person, or
- for reasons of important public interests (e.g. natural disaster).

Your request will be fulfilled free of charges, as soon as possible after receipt of the request, without delay, but no later than within 30 (thirty) days. If your request is found to be ungrounded or excessive (due to its repetitive nature), we may claim the administrative expenses associated with the fulfillment of your request from you, or refuse to taken any action that may be necessary on the basis of your request. If due to the nature and scope of the request or our own workload, we are unable to comply with the request within the given time limit, we will notify you of the reasons for the delay or failure to take action, and we will inform you of your right to lodge a complaint and your right to legal remedies.

5 RIGHT TO DATA PORTABILITY

You may request that we make your personal information we are handling available to you in a structured, commonly used and machine-readable format, while you also have the right to transfer the same data to another controller directly or have it transferred by us.

Your request will be fulfilled free of charges, as soon as possible after receipt of the request, without delay, but no later than within 30 (thirty) days. If your request is found to be ungrounded or excessive (due to its repetitive nature), we may claim the administrative expenses associated with the fulfillment of your request from you, or refuse to taken any action that may be necessary on the basis of your request. If due to the nature and scope of the request or our own workload, we are unable to comply with the request within the given time limit, we will notify you of the reasons for the delay or failure to take action, and we will inform you of your right to lodge a complaint and your right to legal remedies.

6 RIGHT TO OBJECT

You have the right to object to the lawful processing of your personal data by our Company,

- if processing is based on our legitimate interest;
- if processing is necessary for compliance with our statutory obligation;

- where personal data is processed for direct marketing purposes;
- if processing is for scientific or historical research purposes or statistical purposes.

In the event of such objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or which relate to the establishment, exercise or defense of legal claims. In the event of objection, we will investigate the cause of objection within the shortest possible time, but no later than 15 days, adopt a decision, and notify you in writing of our decision. Should you disagree with our decision, you have the right to file an application for judicial review within 30 (thirty) days of its service, or if we failed to make a decision within the given time limit, within 30 (thirty) days of its expiry.

7 RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent to processing at any time, in which case we will comply with your request without delay, and will terminate data processing performed on the basis of your consent. If the withdrawal of your consent is not given in written form, we will take minutes of your declaration of the withdrawal of your consent.

VIII. REMEDIES RELATED TO THE PROCESSING OF YOUR DATA

If you believe that the processing of your data has violated the relevant legal regulations and your rights, in order to eliminate any situation that may be injurious to you as soon as possible, in your best interests, please contact the general manager of our Company immediately in person or at any of our contact details in order to have us investigate the circumstances of your alleged grievance without delay, and remedy any damage you may have suffered as soon as possible. If this procedure remains ineffective, you have the right to lodge a complaint with the competent supervisory authorities at any of the following contact details: Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (e-mail: ugyfelszolgalat@naih.hu, mailing address: H-1363 Budapest, Pf.: 9.) Concerning the investigation of complaints related to the exercise of the associated rights please refer to the following link: <https://www.naih.hu/panaszuegyintezes-rendje.html> Please note that you have the right to address the matter before the court in case you believe that your personal data is processed in breach of the provisions set out in the relevant legal regulations on the processing of personal data or in any binding act of the European Union. You can choose to bring the action before the court having jurisdiction over your place of residence or place of stay.

IX. MODIFICATIONS AND AMENDMENTS TO THE PRIVACY POLICY

We reserve the right to modify or amend this Policy. At your request, the managing director / general manager of our Company will provide full verbal or written information in relation to our data processing and data protection provisions in addition to the contents of this Policy.

Budapest, 16 March 2021

“3P Solutions“ Kft.