Data protection and safety rules

This document is the translation of the legally valid Hungarian version.

1. PURPOSE AND SCOPE OF THE REGULATION

1.1. Since the right to informational self-determination is a fundamental right enshrined in the Basic Law for every natural person, the Company shall only process data in accordance with the applicable legal provisions during its procedures.

1.2. With this Regulation, Sipospack Ltd. (hereinafter referred to as the Company) aims to ensure the regulation of its data processing activities and processes, the realization of the constitutional principles of data protection, the requirements of data security, and the protection of the rights of the data subjects.

1.3. The material scope of the Regulation covers all processes of the Company in which the processing of personal data, as defined in Section 3 (2) of Act CXII of 2011 on the Right to Informational Self-Determination and on Freedom of Information (hereinafter referred to as Info Law), is implemented.

1.4. The temporal scope of the Regulation is from May 25, 2018, until its revocation.

2. DEFINITIONS

2.1. The conceptual system of this Regulation corresponds to the definitions specified in Section 3 of the Info Law. Therefore, in particular:

Data subject: any natural person who is identified or can be identified, directly or indirectly, based on personal data.
Personal data: data related to the data subject - especially the name of the data subject, its identifier, and one or more pieces of information related to its physical, physiological, mental, economic, cultural, or social identity -, and any conclusions drawn from the data about the data subject.
Special data: personal data related to racial origin, nationality, political opinion or party affiliation, religious or other worldviews, membership of a trade union, sexual life, health status, addiction, and criminal personal data.
Consent: the data subject's voluntary and determined expression of will, based on proper information, by which they unequivocally give their consent to the processing of their personal data, either in full or for specific operations.
Objection: the statement of the data subject by which they object to the processing of their personal data and request the termination of data processing or the deletion of the processed data.

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473
www.sipospack.hu

Data Controller: A natural or legal person, or an organization without legal personality, who or which determines the purposes and means of the processing of personal data, either alone or jointly with others, makes decisions related to data processing (including the tools used) and implements them, or has them implemented by a data processor.
Data Processing: Any operation or set of operations performed on the data, regardless of the procedure applied, including in particular collection, recording, organization, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure, and destruction, as well as preventing further use of the data, creating photo, sound, or image recordings, and recording physical characteristics suitable for identifying the person (e.g., fingerprint, palm print, DNA sample, iris image).
Data Transfer: Making the data accessible to a specific third party.
Disclosure: Making the data accessible to anyone.
Data Erasure: Making the data unrecognizable in such a way that its restoration is no longer possible.
Data Blocking: Marking the data with an identifier to restrict its further processing for a permanent or specified period.
Data Marking: Marking the data with an identifier for distinction purposes.
Data Destruction: Complete physical destruction of the data carrier.
Data Operation: Performing technical tasks related to data processing operations, regardless of the method and tool used for the operations and the location of application, provided that the technical task is performed on the data.
Data Processor: A natural or legal person, or an organization without legal personality, who or which processes data on the basis of a contract, including a contract concluded under legal provisions.
Data Set: The entirety of data managed in one registry.
Third Party: A natural or legal person, or an organization without legal personality, who or which is not the same as the data subject, the data controller, or the data processor.
Data Protection Incident: Unlawful processing or handling of personal data, especially unauthorized access, alteration, transmission, disclosure, erasure, or destruction, as well as accidental destruction and damage.

2.2. In case the definitions provided by the applicable laws differ from the definitions in this Regulation, the terms defined by the specific law shall prevail.

3. GENERAL RULES OF DATA CONTROLLING ACTIVITY

3.1. Personal data can only be processed for the exercise of a right or the fulfillment of an obligation, and it must be purpose-bound. Data processing must always ...must adhere to the principle of purpose limitation. The use of processed personal data for private purposes is prohibited.

3.2. Personal data can only be processed to the extent and duration necessary to achieve the purpose or based on legal provisions. If the purpose of data processing ceases, or the processing of the data is otherwise unlawful, the data will be deleted.

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473
www.sipospack.hu

3.3. The Company processes personal data only with the prior consent of the data subject – in the case of special personal data, written consent – or based on a law or legal authorization.

3.4. Before recording data, the Company always informs the data subject about the purpose, duration, and legal basis of data processing.

3.5. Employees of the Company involved in data processing and employees of organizations participating in data processing on behalf of the Company and performing any of its operations are obliged to keep the personal data they learn as a business secret. Those processing personal data and those with access to them are required to make a confidentiality declaration (Appendix 3).

3.6. If a person under the scope of this Regulation becomes aware that personal data processed by the Company is incorrect, incomplete, or outdated, they are obliged to correct it or initiate its correction with the person responsible for recording the data.

3.7. Data protection obligations for natural or legal persons or organizations without legal personality performing data processing activities on behalf of the Company shall be settled within the framework of a written assignment (contract) in accordance with Section 10 (4) of Infotv. (Appendix 6).

4. ENFORCEMENT OF THE RIGHTS OF DATA SUBJECTS

4.1. The data subject may request information about the processing of their personal data and may request the correction of their personal data or – except for data processing mandated by law – its deletion through the Company's specified contact details (hereafter: request).

4.2. The Company will respond to the request related to the processing of the data subject's personal data in writing, in an understandable form, within a maximum of 25 days from its receipt – in case of exercising the right to object, within 15 days.
The information covers the details specified in Section 15 (1) of Infotv., unless the information of the data subject can be denied by law. Providing this information is generally free of charge, however ...the Company can only charge fees in the cases specified in Section 15 (5) of Info Law.

4.3. The Company can only reject a request for the reasons specified in Section 9 (1) or Section 19 of Infotv. Such rejection can only be made in writing, with justification, and with the information specified in Section 16 (2) of Info Law.

4.4. The Company is obliged to compensate for any damage caused to others by the unlawful processing of the data subject's data or by breaching data security

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473
www.sipospack.hu

requirements, and for any harm to personal rights caused by the Company or the data processor it employs. The data controller is exempt from liability for the damage caused and the obligation to pay compensation if it proves that the damage or the violation of the data subject's personal rights was caused by an unavoidable reason outside the scope of data processing. Similarly, it will not compensate for damage if it arose from the deliberate or grossly negligent behavior of the injured party.

4.5. The data subject can seek legal redress or file a complaint with the National Data Protection and Freedom of Information Authority, or the competent court based on their place of residence.

National Data Protection and Freedom of Information Authority:
Adress: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
Postal adress: 1530 Budapest, Pf.: 5.
Telephone: +36 (1)391-1400,
URL: https://naih.hu,
E-mail: ugyfelszolgalat@naih.hu

5. DATA PROTECTION AND DATA SECURITY POLICY

5.1. The Company's chief officer is responsible for enforcing the provisions prescribed in this Regulation.

5.2. The Company's employees ensure during their work that personal data storage and placement are designed in such a way that they are not accessible, recognizable, alterable, and destructible by unauthorized persons.

Physical Protection

5.3. To ensure the security of personal data handled on paper, the Company applies the following measures:

- The data can only be accessed by those authorized; others cannot access or disclose them;
- Documents stored on paper are placed in a room equipped with lockable property and fire protection equipment;
- Only the relevant personnel can access documents under continuous active management;
- An employee processing data can only leave a room where data processing takes place by ensuring that the entrusted data carriers are locked away or the office is locked;
- At the end of their work, employees who process data lock away paper-based data carriers;

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473
www.sipospack.hu

- Once the purpose of processing personal data stored on paper has been achieved, unless there's a legal requirement, the Company ensures the destruction of the paper;
- If personal data handled on paper undergo digitization, the security measures applicable to digitally stored documents are used;
- If the data carrier for personal data is not paper but another physical tool, the rules applicable to paper-based data processing apply.

IT Protection

5.4. To ensure the security of personal data stored on computers and on the network server (hereinafter referred to as "server"), the Company implements the following measures and warranty elements:

- The computers used during data processing are owned by the Company or are under a right equivalent to ownership rights by the Company;
- To ensure the security of data stored on the server, the Company uses data backups to prevent data loss; the Company performs monthly backups of active data from databases containing personal data on the server, and this backup applies to the entire data set of the central server;
- Access to electronically stored data can only be obtained with valid, personalized, identifiable authorization - at least with a username and password; the Company regularly takes care of changing passwords and does so in justified cases;
- The Company continuously ensures the protection of data (including virus protection and firewall) on computers and servers processing personal data, thereby preventing unauthorized access;
- Should the purpose of data processing be achieved, the deadline for data processing expires, and unless there is a legal provision on this, the Company will return the personal data in its possession to the data subjects and permanently delete every copy made from the data so that the data cannot be recovered.

5.5. For IT protection and server security, the Company entrusts a legal entity, an external expert IT company (hereinafter referred to as "IT partner"). The Company records the relevant data protection obligations in the commissioning contract concluded with the IT partner.

6. DATA PROCESSING AT THE COMPANY

Handling Customer Data

6.1. Purpose of data processing / scope of processed data: Customer data management related to the services provided by the Company and the sale of products:

- Personal data necessary for contact: name, phone number, email address;
- Personal data necessary for issuing an invoice: name, address.

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473

www.sipospack.hu

6.2. Legal basis for data processing: The Company processes personal data exclusively based on the prior consent of the data subject.

6.3. Data storage deadline: The Company processes personal data until the purpose of data processing is achieved or until consent is withdrawn.

6.4. Method of data storage: on paper and electronically.

6.5. Place of data processing: 2038 Sóskút, Jedlik Ányos Street 10.

6.6. Data processing registration number: Given that data processing concerns users in a customer relationship with the data controller, pursuant to Section 30 (a) of Act LXIII of 1992 on the Protection of Personal Data and the Publicity of Data of Public Interest, the registration of data processing in the data protection register is not required.

Employee Data Management

6.7. Purpose of data processing: Fulfilling the Company's obligations arising from or related to the employment relationship with its employees (Annex 2).

An employee may only be asked to provide data that does not violate their personality rights and is essential from the perspective of establishing, fulfilling, or terminating the employment relationship. Only such a fitness test can be required from the employee Such fitness tests can only be applied if prescribed by employment-related regulations or if necessary to exercise a right defined in employment-related regulations or to fulfill an obligation.

6.8. Scope of managed data: Employee's name, birth name, mother's name, place and date of birth, personal identification number, social security number, tax identification sign, educational qualification, and copies of documents and certificates confirming this information.

6.9. Legal basis for data processing: The Company processes the personal data of employees based on their prior consent. (Annex 2)

According to Act I of 2012 on the Labor Code, the employee is obliged to be available to the employer during his/her working hours and to perform his/her work with the generally expected expertise and care, according to the rules, regulations, instructions, and customs related to his/her work. To maintain these statutory obligations, the legislator provides the opportunity for the employer to control the employee in terms of behavior related to the employment relationship, which entitlement necessarily involves the processing of personal data.
Personal data can also be processed if workplace data processing is necessary to enforce the legitimate interest of the employer. In this case, the employer's data processing can be lawful regardless of the consent of the employees, provided that the

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473
www.sipospack.hu

legitimate interest of the employer proportionally restricts the right of the employees to the protection of personal data and their private sphere.

6.10. Data storage deadline: The company stores the data collected from employees in accordance with legal and regulatory requirements.

6.11. Method of data storage: On paper and electronically.

6.12. Place of data processing: 2038 Sóskút, Jedlik Ányos Street 10.

6.13. Data processing registration number: Considering that data processing concerns users in an employment relationship with the data controller, under Section 30 (a) of Act LXIII of 1992 on the Protection of Personal Data and the Publicity of Data of Public Interest, the registration of data processing in the data protection register is not required.

Data processing related to camera surveillance

6.14. Purpose of data processing: The purpose of camera surveillance is to prevent and prove illegal activities, monitor work discipline, ensure compliance with occupational safety regulations, and protect the assets owned by the Company.

6.15. Scope of managed data: The likeness of individuals present at the Company's premises and their certified behavior.

6.16. Legal basis for data processing: The legal basis for our data processing is the legitimate interest of the Company related to the aforementioned purposes and the statutory authorization obtained in Section 31 (1) of the Szvtv. The information and consent of the employee regarding camera surveillance are contained in Annex 4.

6.17. Retention time of the recordings: The recorded footage (unless used in an official or judicial procedure, or the data subject does not request its retention) will be destroyed in accordance with Section 31 (2) of the Szvtv, three days after the recording.

6.18. Method of data storage: Electronically

6.19. Place of data processing: 2038 Sóskút, Jedlik Ányos Street 10.

6.20. Data processing registration number: 1154357

Data processing related to the website:

6.21. The Company's data processing related to its website is governed by the Privacy Statement (Annex 7) of the www.sipospack.hu website.

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473

www.sipospack.hu

7. DATA PROCESSING, DATA TRANSFERS

For the given data processing, the Company employs the following data processors:

7.1. Accounting and payroll processing:
- Contracted partner: Finessza Accounting and Tax Consulting Ltd.
- Headquarters: 2051 Biatorbágy, Rákóczi Street 8.
- Company registration number: 13-09-116720
- Tax number: 14137798-2-13

7.2. Database server operation, computer maintenance
- Contracted partner: Szi-Ber-Tech Ltd.
- Headquarters: 2051 Biatorbágy, Bocskai Street 34.
- Company registration number: 01-06-724943
- Tax number: 20350826-2-42

7.3. Programming, enterprise management system supervision
- Contracted partner: Vector Kft.
- Headquarters: 6000 Kecskemét, Sörház u. 7.
- Company registration number: 03-09-100666
- Tax number: 10574807-2-03

7.4. Cleaning
- Contracted partner: Hideg Pál Sole Proprietorship
- Headquarters: 2461 Tárnok, Kárász Street 8.
- Tax number: 68891716-1-33

7.5. Postal and courier services:
- Contracted partner: Mail Services Ltd.
- Headquarters: 1158 Budapest, Petrence Street 96.
- Company registration number: 01 09 915028
- Tax number: 14682580-2-42

7.6. Insurance
- Contracted partner: Generali Insurance Plc.
- Headquarters: 1066 Budapest, Teréz Blvd. 42-44
- Company registration number: 01-10-041305
- Tax number: 10308024-4-44

7.7. Web Development
- Contracted partner: POPULAR Marketing Ltd.
- Headquarters: 8308 Zalahaláp, Alkotmány Street 11.
- Company registration number: 19-09-518533
- Tax number: 25573723-1-19

8. FINAL PROVISIONS

8.1. For matters not regulated in connection with data protection and data security, the following current legal regulations apply:

- Act CXII of 2011 on the right to informational self-determination and freedom of information;
- Act LXIII of 1992 on the protection of personal data and the publicity of data of public interest;
- 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;
- The Fundamental Law of Hungary (April 25, 2011).

Dated: Budapest, 25th May, 2018.

SIPOSPACK Kft.
Gyula Sipos

SIPOSPACK Kft. H-2038 Sóskút, Jedlik Ányos u. 10. / +36 30 941 2970 / sipospack@sipospack.hu / Adószám: 12149085-2-13 / Cégjegyzékszám: 13-09-072473
www.sipospack.hu