

PRIVACY NOTICE
ON DATA PROCESSING CONDUCTED UNDER THE PROGRAMMES OF HIVENTURES

By means of this Privacy Notice, Hiventures Venture Capital Fund Management Company Limited by Shares (hereinafter: “Hiventures”) informs data subjects on the decisive circumstances of data processing, their rights regarding data processing and the remedies available. Hiventures Ltd. processes your personal data as provided herein. Personal data shall mean any information relating to you as a natural person. This Notice can be accessed and learned by anyone free of charge and without any restrictions. Please read the information carefully.

In the course of handling, keeping records of, processing and transferring your personal data, Hiventures acts in accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: “**GDPR**” or “General Data Protection Regulation”), Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter: “Info Act”), and other applicable legal provisions and authority recommendations, by observing specific legal requirements governing investment activities.

DATA CONTROLLER:

The entity that processes your personal data and shall be liable for this activity (data processing).

The data controller is Hiventures Venture Capital Fund Management Company Limited by Shares. (hereinafter: “Hiventures”; registered office: H-1027 Budapest, Kapás utca 6-12.; company registration number: 01-10-044176; VAT number: 11905246-2-41).

DATA SUBJECT:

You as the subject of personal data. If you act as an official representative of a legal entity and not as a private individual (authorised to sign on behalf of the entity either individually or jointly), Hiventures will process and protect your personal data as provided herein.

THIRD PARTY:

Any person or entity other than you and Hiventures to whom Hiventures transfers your personal data in order to comply with legal obligations.

DATA PROCESSING ACTIVITIES CONDUCTED BY HIVENTURES:

1. Subscription to newsletter,
2. PPC-based online marketing activity

1. SUBSCRIPTION TO NEWSLETTER

If you wish to receive up-to-date information on our products, current events or news concerning the startup ecosystem in newsletters, we will process your name and e-mail address – and your gender, birth date and fields of interest if provided optionally – based on your consent. You have the option to unsubscribe from our newsletter anytime, that case we will no longer send you any newsletter and stop processing your data in this respect. Hiventures processess the personal data of the Data Subject until the erasure of the same is requested by the Data Subject, and/or until the purpose of processing is achieved. Hiventures processes personal data provided only by the Data Subjects, and does not collect any data from other sources.

The data processing activity is based on the prior explicit consent of the natural person concerned to processing as required by Section 5 (1) a) of the Info Act and Article 6 (1) a) of the GDPR.

2. ONLINE MARKETING ACTIVITY

USE OF PERSONAL DATA IN ONLINE MARKETING ACTIVITY

If you wish to receive up-to-date information on our products, current events or news concerning the startup ecosystem in newsletters or PPC-based online marketing campaigns, you have the option to provide us with your name and e-mail address, and you can also give your gender and birth date optionally. If you register for an event organised by Hiventures, we may use your e-mail address entered upon registration to contact you for marketing purposes. We process the personal data provided solely for the purpose of sending you commercial advertisements, based on your consent.

In addition, we process the following personal data when you register for an event: company name (if different from the participant's name), participant's position and phone number.

Our company processes your personal data until you withdraw your consent or exercise your right to object.

YOUR OBLIGATIONS AS DATA SUBJECT

You are required to keep and treat any fact, information, solution, data as well as any fact, information, solution that qualifies as business secret and any data – or data that qualifies as personal data – indicated on any form or contract you become aware of under the legal relationship established between Hiventures and you (hereinafter: “data”) as trade secret. You may not disclose data to any third person. Exemption from this obligation may be granted solely by the chief executive officer of Hiventures or a person authorized by the same in writing.

OBLIGATIONS OF HIVENTURES AS CONTROLLER

Hiventures shall keep and treat any data it becomes aware of as trade secret and in accordance with this Notice (and its Data Privacy and Security Policy). It may deviate from this practice solely if

- mandatorily required by law, however in this case it shall inform you without delay,
- you have expressly authorised Hiventures to act so.

Hiventures may transfer or disclose data to a third party only limited to the cases and scope of third parties specified herein:

- Kőkupec Bt. (registered number: H-2040 Budaörs Eper utca 4/b.; company registration number: 13 06 056550) and Anna Turnhauser, sole proprietor (registered office: H-1039 Budapest, Attila u. 92. 2 ép. fsz. 5.) as data processors – acting as website developers – have access to the data entered on the website startup.hiventures.hu.

In this case, the legal basis for data processing is ensured by the data processor contracts entered between Hiventures and Kőkupec Bt., and Hiventures and Anna Turnhauser (sole proprietor), respectively.

- Hello Event Kft. (registered office: H-1117 Budapest, Szerémi út 7/A. 1. em. 104-; company registration number: 01-09-690650) as data processor – acting as website developer – has access to the data entered on the website rsid.hu.

In this case, the legal basis for data processing is ensured by the data processor contract entered between Hiventures and Hello Event Kft.

- Antenna Hungária Zrt. (registered office: H-1119 Budapest, Petzvál József utca 31-33.; company registration number: 01 10 042190) as data processor – acting as website operator – has access to the data entered on the websites startup.hiventures.hu and rsid.hu.

In this case, the legal basis for data processing is ensured by the data processor contract entered between Hiventures and Antenna Hungária Zrt.

- Zsófia Frang, sole proprietor (registered office: H-1062 Budapest, Bajza utca 64. lp.: A. em.: 3. ajtó: 46.) acting as data processor has access to the data entered for the purpose of online marketing activity.

In this case, the legal basis for data processing is ensured by the data processor contract entered between Hiventures Ltd. and Zsófia Frang (sole proprietor).

- The bodies responsible for the legal and economic supervision of the programme have the right to learn any element of the programme, thus even your personal data. Neither you nor Hiventures has the right to object to such data processing. The following third parties fall in this category:

- MFB Hungarian Development Bank Private Limited Company
- MFB Invest Company Limited by Shares
- Central Bank of Hungary
- Managing Authorities
- Ministry for Technology and Innovation and Neumann János Nonprofit Public Benefit Limited Liability Company (if the potential investor is the Infocommunications State Capital Fund)
- Commission of the European Union and its control bodies

Legal basis for data transfer: legitimate interest of the third party (preparation of decision, conduct of inspection).

- Transferring data necessary for the conclusion of contract to the lawyer proceeding.
Legal basis for data transfer: legitimate interest of the party (in order to implement investments, for the purpose of editing the required documents).
- In the case of any final court decision, Hiventures may be obligated to disclose any element of the programme – thus also your personal data – to the authorities.

Legal basis for data transfer: final court decision, compliance with a legal obligation under the GDPR.

Hiventures shall be liable for the activity of any person involved in data processing (employee of Hiventures or a representative of the specified data processor) towards you.

YOUR RIGHTS ASSOCIATED WITH DATA PROCESSING

You have the right to request information on the processing of your personal data, request the provision and the rectification of your personal data, and – unless processed mandatorily required by law – the erasure of the same or the restriction of processing from Hiventures. Furthermore, you are granted the right to data portability.

Any such request must be addressed to the data protection officer of Hiventures (either by post or e-mail): dr. Zoltán Lajkovics (e-mail address: adatvedelem@hiventures.hu; postal address: H-1027 Budapest, Kapás u. 6-12.).

Hiventures will respond to your written request on the merits as soon as possible, but at the latest within 30 days from the official receipt of the request. “Official receipt” shall mean the

case where a postal mail is received by Hiventures or the legal fiction of delivery arises, and where an electronically sent request (e-mail) is received on the server of Hiventures.

IF YOU INTEND TO EXERCISE YOUR RIGHT OF ACCESS:

You are entitled to obtain confirmation as to whether or not your personal data are being processed, and, where that is the case, access to your personal data we store and a copy thereof at any time by contacting us. Furthermore, you have the right to request information on the manner of how we process your personal data. If doing so, please enter your name and e-mail address so we can identify you. As a general rule, the provision of information is free of charge.

Moreover, you also have the right to request a copy of your personal data subject to processing from Hiventures. In this case, we provide you with the personal data in a structured, commonly used and machine-readable format (PDF/XML) or in a printed version, on paper. Copies can be requested free of charge.

IF YOU INTEND TO WITHDRAW YOUR CONSENT:

If you have consented to the use, processing or disclosure of your personal data, you have the right to withdraw your consent at any time, provided that the withdrawal concerns data not necessary for the provision of service. If doing so, please enter your name and ID data so we can identify you.

IF YOU REQUEST THE RECTIFICATION OF YOUR DATA:

Please enter your name and ID data so we can identify you, and indicate the scope of data intended to be rectified along with the reason of your request (change in data, misspelling, inaccurate data etc.).

IF YOU REQUEST THE ERASURE OF YOUR DATA:

You have the right request the erasure of your specific personal data without undue delay, if:

- we no longer need the given data;
- you withdraw your consent to the processing of specific data;
- you object to the processing of personal data;
- the data has to be erased for compliance with a legal obligation;
- you have concerns regarding the legal basis for processing your data by us.

IF YOU REQUEST THE RESTRICTION OF PROCESSING YOUR DATA:

If you have any questions or concerns regarding the accuracy, justification or lawfulness of processing your personal data by us, you have the right to request the restriction of our specific data processing activities.

Furthermore, you are entitled to request such restriction where we no longer need your data, but you as data subject request it for filing, enforcing or defending a legal claim of yours. Similarly, you have the right to request such restriction where you contest the existence of legal basis for processing on the grounds of legitimate interests.

During the period of such restriction, no processing operations may be conducted, data may only be stored.

DATA PORTABILITY

By means of submitting a request to our contact addresses, you have the right to request the provision of personal data concerning you processed by Hiventures for the purpose of their

further use determined by you. In addition, you are also entitled to have your personal data transferred by Hiventures to another data controller designated by you.

This right shall be limited to the scope of personal data you provided us with for processing. Portability is not possible for other data. Hiventures provides you with the personal data in a structured, commonly used and machine-readable format (PDF/XML) or in a printed version, on paper.

Please note that exercising this right will not automatically result in the erasure of your personal data in the systems of Hiventures. Furthermore, you remain entitled to repeatedly contact or regularly communicate with Hiventures after exercising your right to data portability.

YOUR FURTHER REMEDY OPTIONS IN RELATION TO DATA PROCESSING

Please let us inform you once again that you have the right to withdraw your consent at any time at our contact addresses (info@hiventures.hu; H-1027 Budapest, Kapás u. 6-12.). In case you withdraw your consent, we are required to end processing your personal data, and also to erase them.

Furthermore, you have the right to object to processing your personal data at any time at our contact addresses (info@hiventures.hu; H-1027 Budapest, Kapás u. 6-12.). In case you object, we – since processing serves for direct marketing purposes – are required to end processing your personal data, and also to erase them.

Should you have any complaints in connection with processing by Hiventures, our data protection officer is at your disposal with pleasure either during business hours or out of turn. Hopefully, we will be able to solve your issue.

If you still find our data processing practice illegal or infringing, claim that your request was unlawfully rejected, or you do not want to discuss your issue with our data protection officer, you have the right to contact two organisations directly.

You can submit a written request to the National Authority for Data Protection and Freedom of Information (H-1125 Budapest, Szilágyi Erzsébet fasor 22/c.; +36 (1) 391-1400; ugyfelszolgalat@naih.hu; online initiation of procedure: <http://www.naih.hu/online-uegyinditas.html>). Alternatively, you can proceed to the regional court competent according to your place of residence or stay (please refer to the website <http://birosag.hu/torvenyszekek> to find out which regional court is competent in your case).

Budapest, 14 September 2020