



Data Management Information

The "Data Controller" or "Company" is committed to handling personal data with the utmost care. Accordingly, the Data Controller has developed its data management, data processing, and data deletion regulations and internal systems for the protection of personal data according to legal requirements, considering the nature of its activities, legal obligations, and the relationships with its clients and partners.

The following information provides a detailed description of how and for what purposes the Data Controller handles your (hereinafter referred to as "Data Subject") personal data and what rights you have regarding the data handled by the Data Controller.

The Data Controller

Data Controller's details:

- Representative's name: Norbert Reinhardt
- Email address: info@zerosoftwarelab.com

Applicable Data Protection Laws

The Data Controller carries out its data management activities in compliance with data protection laws related to the handling of personal data of natural persons. The principles of the Data Controller's data management comply with the following laws:

- 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/EC (General Data Protection Regulation, "GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Infotv.");
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services ("Eker tv.");
- Act LXVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities ("Grt.").

For matters not or not fully regulated in this information, the provisions of the GDPR, the Infotv., and the other laws listed above shall apply.

Modification of the Information

The Data Controller reserves the right to unilaterally modify this Information. The current Information is available on the website operated by the Data Controller.

Definitions

The following definitions apply to this Information:

- "data processor": any natural or legal person, public authority, agency, or other body which processes personal data on behalf of the data controller;
- "data processing": any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction;
- "restriction of data processing": the marking of stored personal data with the aim of limiting their processing in the future;
- "data controller": the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the data controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- "data transfer": making data accessible to a specific third party;
- "data deletion": making data unrecognizable in such a way that it can no longer be restored;
- "data protection incident": a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed;
- "recipient": a natural or legal person, public authority, agency, or another body to whom the personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- "data subject's consent": any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- "third party": a natural or legal person, public authority, agency, or body other than the data subject, data controller, data processor, and persons who, under the direct authority of the data controller or data processor, are authorized to process personal data;
- "website": the Data Controller's website accessible at zerosoftwarelab.com and its subpages;
- "data processing based on legitimate interest": the processing of personal data necessary for the purposes of the legitimate interests pursued by the data controller or by a third party;
- "representative": a natural or legal person established in the Union who, designated by the data controller or processor in writing pursuant to Article 27 of the GDPR, represents the data controller or processor with regard to their respective obligations under the GDPR;
- "profiling": any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular, to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements;
- "relevant and reasoned objection": an objection to a draft decision as to whether there is an infringement of the GDPR, or whether the envisaged action in relation to the data controller or data processor complies with the GDPR. The objection must clearly demonstrate the significance of the risks posed by the draft decision to the fundamental

rights and freedoms of data subjects and, where applicable, to the free movement of personal data within the Union;

- "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, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person;
- "data processing necessary for the performance of a contract": the processing of personal data necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract.

Cookie Information

The Data Controller informs visitors to the Website that data collection and data processing occur using anonymous identifiers ("cookie" or "cookie") with the acceptance of these by the Data Subject, without web-based contact with the Data Subject.

Cookies do not contain any personal data and are not suitable for identifying individual users.

Cookies can be "persistent" or "session" cookies. Persistent cookies are stored by the browser until a specified date unless deleted by the user earlier; session cookies are not stored by the browser and are deleted when the browser is closed.

Cookies help to uniquely identify the browser, remember the user's actions and personal settings (e.g., username, language, font size, and other display preferences) for a certain period. This means you do not have to re-enter them every time you visit our website or navigate from one page to another.

In general, "cookies" and other similar programs facilitate the use of the website, help ensure that the website provides a real web experience and effective information source for visitors, and ensure that the website operator can monitor the operation of the site, prevent abuse, and provide uninterrupted and proper quality services.

Type of Cookie	Purpose of the Cookie	Legal Basis for Data Processing	Retention Period of Cookies
Google Analytics	The Website uses the Google Analytics tool to collect and analyze data about how users use the Website. These data are used to compile reports and improve the Website. Data collection occurs in a form that does not	The user's consent.	Google Analytics cookies are created when the user visits a website with a valid Google Analytics tracking code. The cookies are stored in the user's browser for up to 2 years from the date of creation.

	allow for personal identification, such as how many people used the Website, where they came from, and which pages they viewed within the Website. Based on the collected data, it is not possible to identify the user. To view Google's privacy policy, click here .		
Session identifier (website language)	Session cookies enable the recognition of language settings selected by the user on the Website.	Acceptance mandatory.	is The data is retained by the system until the end of the session. Thereafter, the collected data will no longer be available.
Meta pixel	The Meta pixel is a code that allows the website to generate reports on conversions, build audiences, and provide the site owner with detailed analytical data about visitors' use of the website. Using the Meta remarketing pixel tracking code, the website can display personalized offers and advertisements to visitors on the Meta platform. The Meta remarketing list is not suitable for personal identification.	The user's consent.	For more information about Meta Pixel, click here .

Acceptance/Rejection of Cookies: Acceptance of the use of "cookies" is not mandatory. You can refuse the use of cookies through the settings of your computer or other devices used for browsing or the browser used to access the Website. In such cases, some pages may not display properly, and the system may inform you that cookies must be enabled to view the website.

Without the application of cookies, we cannot guarantee the full use of the website.

Names, addresses, and tasks of Data Processors related to cookies: Google LLC, CA 94043 Mountain View, 1600 Amphitheatre Parkway, United States, detailed information about analytical data processing: <http://www.google.com/intl/hu/policies/>

Otherwise, technically recorded data are the data of the computer logging into the Website, generated during browsing and automatically recorded by the Data Controller's system as a result of technical processes (e.g., IP address, session ID). Due to the nature of the Internet, automatically recorded data is automatically logged by the system without the user's separate declaration or action – through the use of the Internet. These data cannot be linked to other personal data, except in cases required by law. Only the Data Controller has access to the data. Log files automatically and technically recorded during the operation of the Website are stored for the period justified by the purpose of ensuring the operation of the Website.

Purpose of Data Processing, Scope of Data Processed, Duration of Data Processing The Data Controller always processes personal data exclusively for a specific purpose, to the necessary extent, for the exercise of rights and fulfillment of obligations. In all stages of data processing, the purpose of data processing must be met; data collection and processing must be fair and lawful. Personal data may only be processed to the extent and for the duration necessary to achieve the purpose.

Contact

Activity to which data processing is related	Contacting the Data Controller through the "Contact" webpage or by sending an electronic letter to the provided email address.
User	User using the "Contact" function of the Website or sending an electronic letter.
Scope of personal data processed	Name, email address, company name, phone number, tax number, and any other personal information provided by the user
Purpose of data processing	Managing messages, sending responses.
Duration of data processing:	Until the Data Subject withdraws consent
Legal basis for data processing:	Data Subject's voluntary consent.

Application for a Job Advertisement

Activity to which data processing is related	Filling positions advertised by the Data Controller
User	Applicants for job advertisements
Scope of personal data processed	Applicant's name, email address, phone number, other personal data provided in the resume (e.g., date of birth, photo, etc.), making offers, concluding contracts, carrying out projects.

Purpose of data processing	Selecting potential candidates
Duration of data processing:	Until written withdrawal of consent
Legal basis for data processing	Data Subject's voluntary consent.

Making Offers, Concluding Contracts, Carrying Out Projects

Activity to which data processing is related	Services provided by the Data Controller within the scope of business activities.
User	Client, employees, collaborators, project participants
Scope of personal data processed	Client (organization) name, contact person's name, email address, phone number
Purpose of data processing	Communication related to making offers, concluding contracts, and carrying out projects, sending documents
Duration of data processing	Until written withdrawal of consent
Legal basis for data processing	Legitimate interest

Subscription to Newsletter

Activity to which data processing is related	Newsletters, service notifications, marketing purposes sent by the Data Controller
User	Client, employees, collaborators, project participants
Scope of personal data processed	Data Subject's name, email address
Purpose of data processing	Distributing the Data Controller's marketing materials by electronic mail, promoting events, sending newsletters and notifications to the Data Subjects.
Duration of data processing	Until written withdrawal of consent
Legal basis for data processing	Data Subject's voluntary consent.

Rules for Data Processing If data processing serves multiple purposes simultaneously, consent must be given for all purposes of data processing. If data processing is not based on contractual obligations, legal obligations, or legitimate interest, personal data may only be processed with the explicit consent of the Data Subject. The Data Subject is entitled to withdraw consent at any time.

Withdrawal of consent, however, only affects data processing based on consent, not on other legal grounds. Withdrawal of consent does not affect the lawfulness of data processing based on consent before its withdrawal.

Access to Data, Data Transfer The Data Controller has implemented IT support to ensure that only those individuals who need to process personal data have access to such data. Furthermore, if necessary based on the legal basis for data processing, the Data Controller is entitled and obligated to transfer or make accessible the data it manages to the authorized party. The Data Controller may transfer personal data to its contracted service providers to the extent and for the duration necessary for the performance of their tasks, but not exceeding the extent and duration specified above.

Data Processor The Data Controller is entitled to involve a data processor in performing its data management activities during the entire period the data is in its possession. Involving a data processor, the Data Controller requires that the contracted data processor complies with the GDPR provisions and maintains the necessary records to protect personal data. The Data Controller engages the following Data Processor(s) for the activities specified below: The Data Controller does not engage a data processor. Data transfer may occur in the following cases:

- To comply with data provision obligations to authorities or courts;
- In cases of mandatory data provision prescribed by law;
- To fulfill the obligations undertaken in connection with a concluded contract or to ensure compliance with these obligations if a service is provided jointly with another partner. The Data Controller provides information about the recipients of data transfers upon the request of the Data Subject. The Data Controller ensures that the individuals specified above process the data in compliance with applicable data protection rules and legal provisions regarding confidentiality.

Data Deletion The Data Controller processes data to the extent and for the duration necessary to achieve the purpose of data processing or as required by law, in accordance with the Data Controller's current Document Management Policy. Upon the termination of the purpose of data processing, the Data Controller deletes the data or anonymizes it if possible, according to the principle of limited storage.

Data Security During data processing, the Data Controller ensures:

- Confidentiality: Protecting the information so that only those authorized can access it;
- Integrity: Protecting the accuracy and completeness of the information and processing methods;
- Availability: Ensuring that authorized users have access to the required information when needed, and related tools are available.

The Data Controller, as a data controller and data processor within its scope of activities, ensures the security of data and takes the necessary technical and organizational measures to implement the GDPR and other data and confidentiality protection rules. During data storage, the Data Controller ensures that unauthorized persons cannot access the data and that the confidentiality of the data is maintained throughout the entire duration of data processing. The Data Controller protects the data with appropriate measures, particularly against unauthorized access, alteration, transmission, disclosure, or deletion, accidental damage, and from becoming inaccessible due to changes in the applied technology. During data processing, the Data Controller ensures an

adequate level of protection for the data by introducing and implementing various technical and organizational measures. These measures ensure a level of protection appropriate to the risks related to the nature of the personal data and the state of the art, the nature, scope, context, and purposes of data processing, and the varying likelihood and severity of risks to the rights and freedoms of natural persons. To this end, the Data Controller uses data processing systems and develops and applies procedural rules that ensure that only those individuals who need the information for the performance of their activities can access it, and minimize the possibility of the information being misused or used unlawfully.

Information about Data Security Measures: In the event of a data protection incident, the Data Controller reports it to the National Authority for Data Protection and Freedom of Information without undue delay and, where feasible, not later than 72 hours after becoming aware of it, unless the data protection incident is unlikely to result in a risk to the rights and freedoms of natural persons. If the data protection incident is likely to result in a high risk, the Data Controller shall inform all users without undue delay.

Data Subject's Rights and Enforcement Options

According to applicable laws, the Data Subject may request the Data Controller to:

- Inform the Data Subject about the processing of their personal data;
- Correct the Data Subject's personal data;
- Delete the Data Subject's personal data (except for mandatory data processing);
- Request data portability;
- Object to unlawful data processing and data transfer;
- Initiate the restriction of data processing;
- Seek legal remedy.

In the event of a violation of rights related to personal data processing, the Data Controller provides the following legal remedies to the Data Subject:

- Request information about the processing of their personal data and request the correction of personal data. Upon request, the Data Controller provides information about the data it processes, the purpose, legal basis, and duration of data processing, the name and address (headquarters) of the data processor, and the activities related to data processing, as well as who and for what purpose received or will receive the data. The information is provided in writing, in an understandable form, within the shortest possible time from the submission of the request, but no later than 30 days, unless a shorter deadline is stipulated by law.
- The Data Subject's personal data will be deleted if its processing is unlawful, if the Data Subject requests it (except for data processing based on mandatory legal requirements), if the purpose of data processing ceases, if the data is incomplete or inaccurate and this condition cannot be legally remedied, provided that the deletion is not precluded by law, if the storage period specified by law expires, or if deletion is ordered by the court or the National Authority for Data Protection and Freedom of Information. The Data Controller notifies the Data Subject of the correction and deletion. Notification may be omitted if it does not violate the Data Subject's legitimate interest in view of the purpose of data processing.

- Within the scope of the right to restrict data processing, the Data Subject is entitled to request the restriction of processing of their personal data by the Data Controller, among other things, if:
 - The accuracy of the personal data is contested by the Data Subject;
 - The data processing is unlawful, but the Data Subject opposes the deletion of the data;
 - The purpose of data processing has been achieved, but the Data Subject needs the personal data to establish, exercise, or defend legal claims.
- Within the scope of the right to data portability, the Data Subject is entitled to receive personal data processed by the Data Controller in a structured, commonly used, machine-readable format, and to transfer this data to another data controller, provided that:
 - The processing of personal data is based on the Data Subject's consent or is necessary for the performance of a contract and;
 - The processing is carried out by automated means.
- The Data Subject may withdraw their consent to the processing of their personal data at any time, without affecting the lawfulness of processing based on consent before its withdrawal. The Data Subject may object to the processing of their personal data if:
 - The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party;
 - Exercising the right to object is otherwise permitted by law.
- The Data Controller, while suspending the data processing, investigates the objection as soon as possible, but within no more than 30 days, and informs the Data Subject in writing of the result. If the Data Controller determines that the objection is justified, it terminates the data processing, including further data collection and data transfer, and blocks the data, and notifies all those to whom the personal data affected by the objection was previously transmitted and who are obliged to take action to enforce the right to object.
- If the Data Subject disagrees with the Data Controller's decision or if the Data Controller fails to comply with the deadline stipulated by the Infotv., the Data Subject may file a lawsuit within 30 days of the decision being communicated or the deadline expiring.

National Authority for Data Protection and Freedom of Information (Supervisory Authority) The Data Subject may submit a complaint regarding the processing of their personal data to the National Authority for Data Protection and Freedom of Information (NAIH) (address: H-1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1374 Budapest, Pf.: 603.; phone number: +36-1-391-1400; fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu) or to the data protection authority of their nationality or residence.

If the Data Subject's rights are violated, they may file a lawsuit regardless of filing a complaint with the NAIH under the data protection law. The procedure can be initiated at the court with jurisdiction based on the Data Subject's permanent or temporary residence. Before initiating legal proceedings, it may be advisable to discuss the complaint with the Data Controller.

The Data Subject's rights and legal remedies are regulated in detail in Sections 14-18 and 21-23 of the Infotv. and Articles 15-21 of the EU General Data Protection Regulation (GDPR).

Budapest, June 11, 2024

ZERO SOFTWARE KFT