

DATA MANAGEMENT INFORMATION

market and public opinion research activities

Effective: 1 June 2022

Thank you for taking your time to read this Privacy Policy (the "**Policy**"), which, in accordance with the requirements of the National Authority for Data Protection and Freedom of Information, attempts to inform you as a Data Subject (the "**Data Subject**") about the most important aspects of the processing of your personal data and your rights.

The data processing aspects of our market research and public opinion polling activities are primarily governed by 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation); hereinafter "**GDPR**").

If any of your questions are not fully answered in this document or if you wish to know the legal provisions on which the Policy is based, we will also provide you with them on request.

I. The Data Controller

Name/Controller: **Inspira Research Market Research and Consulting Limited Liability Company**

Head office: 1132 Budapest, Váci út 18.

Company registration number: 01-09-207749

Tax number: 25312085 -2-41

Represented by Gábor Dániel Szabó and Tamás Géczi, respectively, as independent directors;

E-mail address: adatvedelem@inspira.hu

Phone number: +36 70 375 5771

(hereinafter referred to as the "**Data Controller/Company**")

II. Data Protection Officer

Please note that we are not obliged to employ a Data Protection Officer under the applicable legislation, but our Company has, at its own discretion, appointed the following Data Protection Officer, who is available to answer your data processing questions at the following contact details:

Name of Data Protection Officer: Dr. Regős Norbert Law Office

Address: 9700 Szombathely, Király utca 31. I/5.

E-mail address: drregos@trh.hu

Phone number: +36 30 520 8043

III. Specific processing carried out by the Controller; purpose, legal basis and duration of processing; recipients of processing

About our activities

The Data Controller - through its contracted data processors - provides market and public opinion research services to its contracted partners as clients. The market research and public opinion polling services are carried out by collecting and evaluating data by means of questionnaires. In order to complete the questionnaire, which is compiled by the Data Controller and agreed with the partner as the client, the Data Controller seeks potential respondents.

Source of data

The contact details of potential respondents are available to the Data Controller and any data processor(s) it may use as a result of a search of publicly available databases associated with a particular business or as a result of previous personal contact.

The contact details of potential respondents will be treated confidentially by the Data Controller and will not be given or otherwise made available to its contracted partners as clients.

In all cases, participation in the questionnaire **is voluntary** and the answers to the questions are recorded **anonymously**, unless you have given your consent to the processing of your answers and personal data in a separate declaration. Please note that, subject to prior information from a member of the data processor's staff and your consent, telephone conversations may also be recorded during the survey.

The responses to the questionnaire will be aggregated anonymously by the Data Controller and a research report will be prepared based on the aggregation and sent to the Data Controller's contracted partner as the principal.

If you require further clarification on the source of the data, please let us know, as the detail of our sources is beyond the scope of this Policy and not all sources are relevant for all data subjects

Please note that we may use your information from the sources described in this section for purposes other than those set out in this policy only with your written consent and will use it accordingly.

Categories of data processed

Please note that we may process the following personal data:

- your name
- the name of your municipality of residence or domicile
- your year of birth
- your highest level of education
- information about whether you work
- your contact telephone number
- your contact e-mail address
- your voice, possibly because of a telephone conversation with you.

Please also be informed that the Data Controller creates a registration number for your personal data recorded above, which, by being linked to your personal data provided as described above, also constitutes personal data.

We consider it important to point out that the personal data you provide to us listed above will be separated from the other data you provide to us during the market research and public opinion

Inspira Research Ltd.

poll following the market research and public opinion poll conducted between you and our data processor, unless you have consented to the aggregation of your personal data during the market research and public opinion poll.

Categories of data processed - the scope of the data processed, the purpose, legal basis, duration and the name of the data processor

The processing of data name and purpose	Legal basis for processing	Scope of the data processed	Duration of processing
<p>Contacting the data subjects by telephone and filling in the market research questionnaire in order to evaluate the products and to develop its services and send a voucher to the market research participant.</p>	<p>Voluntary consent of the data subject pursuant to Article 6(1)(a) of the GDPR, given by the data subject by telephone.</p> <p>The data subject has the right to withdraw his or her consent at any time.</p> <p>The withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.</p>	<p>Name, address or municipality of residence, year of birth, highest level of education, contact e-mail address, telephone number, whether you work.</p>	<p>Where the data subject consents to attend the personal meeting and to the further processing of his or her data, until the withdrawal of the data subject's consent, but no later than the date of the personal meeting.</p> <p>If the data subject does not consent to further processing of his/her data, no personal data will be processed.</p>
<p>To contact data subjects by telephone and to organise market and public opinion research in face-to-face meetings, or to build a database.</p>	<p>Voluntary consent of the data subject pursuant to Article 6(1)(a) of the GDPR, given by the data subject by telephone.</p> <p>The data subject has the right to withdraw his or her consent at any time.</p> <p>The withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.</p>	<p>Name, address or municipality of residence, year of birth, highest level of education, contact e-mail address, telephone number, whether you work.</p>	<p>Until the data subject's consent is withdrawn.</p> <p>If the data subject completes the questionnaire anonymously, no further processing of personal data will take place.</p>

<p>Voice recording to prove your consent, for use as evidence in legal claims.</p>	<p>Pursuant to Article 6(1)(f) of the GDPR, the processing is necessary for the purposes of the legitimate interests pursued by the Company</p> <p>The legitimate interest of the data subject proof that you have given your consent.</p>	<p>Your voice.</p>	<p>2 years from the date of the phone call.</p> <p>The reason for this is that the data subject may be included in the database for a maximum of two years, during which time the Company must prove that it has lawfully contacted the data subject in the event of an investigation or dispute with the authorities.</p>
--	--	--------------------	--

Recipients of the processing

Our Company discloses your personal data to the following categories of persons:

- in the event of your exercise of the right of access, our Data Protection Officer, who is of course bound by confidentiality, may have access to the personal data processed;
- In the course of our Company's operations and business, your personal data may be accessed by the operator of our IT system, subject to confidentiality obligations;
- in the course of the activities covered by this Policy, your personal data may be accessed by our data processors.

Names and contact details of the data processors who have a contractual relationship with the Data Controller and carry out market and public opinion research:

- **Beyond Research Kft.** (address: 1132 Budapest, Váci út 18., e-mail: adatvedelem@beyondresearch.hu)
- **Inspira Media Research Kft.** (address: 1132 Budapest, Váci út 18., e-mail: adatvedelem@inspira.hu)
- **Scale Research Kft.** (address: 1132 Budapest, Váci út 18., e-mail: adatvedelem@inspira.hu)
- **VOKS Research Ltd.** (address: 1132 Budapest, Váci út 18., e-mail: adatvedelem@inspira.hu)

IV. Your data subject rights in relation to our processing

Please note that your rights in relation to the processing of data covered by this Policy are set out in detail in the GDPR. In this section, we have summarised the most important information about your data protection rights and your legal remedies. If you have any further questions regarding the information contained herein, please contact our Company using the contact details provided above.

You have the right throughout the duration of our processing:

- 1.) Request **information** about the processing of your personal data if you feel that any of the questions in this Policy are not answered, and **request access** to your personal data processed by our Company.

In this context, you can request information on.

- the scope and source of the personal data processed by the Data Controller,
- the purposes, legal basis and duration of the processing or, where it is not possible to provide a duration, the criteria for determining that duration,

Inspira Research Ltd.

- the recipients of the processing - in particular, the name and address of the processor and the activities of the processor in relation to the processing,
- whether a transfer to a third country is taking place,
- the circumstances and effects of data breaches and the steps we take to respond to and prevent them,
- any profiling or automated decision-making that may be used,
- about your legal remedies.

We will provide you with your personal data processed by our Company electronically, by sending an e-mail in .pdf format to the e-mail address you have provided.

You can request this information in writing, by post or by e-mail, provided that you identify yourself by name

The Data Controller shall provide the requested information in an intelligible form within the shortest possible time after receipt of your request, but not later than 15 days. The information shall be provided free of charge if you have not yet submitted a request for information to the Data Controller for the same data subject in the current year. In other cases, the Data Controller may charge a fee. The Controller will reimburse any fee already paid if the data have been unlawfully processed or if your request for information has led to a rectification.

- 2.) You may request **the correction, integration or rectification of** your personal data processed by our Company, in accordance with the data you have provided us with, provided that you identify yourself by providing your name.

Identification may be made by indicating to us by post or electronic mail the inaccurate data and the data that you consider to be correct, and at the same time requesting that the data be replaced or corrected by our Company with the data that you indicate as correct.

- 3.) **Object to** our processing of your data or request **the erasure of** your personal data if:
- a) you consider that your personal data is no longer necessary for the purposes for which it was collected or otherwise processed, or
 - b) you have withdrawn your consent to the processing and there is no other legal basis for the processing; or
 - c) our personal data processing is unlawful for any reason, or
 - d) we need to delete personal data to comply with a legal obligation under EU or Member State law applicable to our Country.

You may request the deletion of your personal data or object to the processing of your personal data by post or by electronic mail, provided that you identify yourself by providing your name

- 4.) Throughout the entire duration of the market research and public opinion poll, we will ensure that you are able to provide your opinion voluntarily and, if you have not consented to the processing of your personal data in the market research and public opinion poll together, that you remain completely anonymous.

V. Remedies

If you feel that your rights as a data subject have been violated by our Company, despite the provisions of this Policy or your exercise of any data subject rights, please contact our Company for a personal consultation.

Subsequently, or even in parallel, you may also have the right to bring proceedings against us before the competent authority or court.

- The competent authority is the National Authority for Data Protection and Freedom of Information [registered office: 1055 Budapest, Falk Miksa u. 9-11., postal address: 1363 Budapest, Pf.: 9., telephone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu, website: <http://naih.hu>], to which you can submit a complaint or initiate proceedings. If you are a foreign national, you can also lodge a complaint with the supervisory authority of your place of residence.
- Data protection litigation falls within the jurisdiction of the courts, but you can choose to bring the case before the court of your domicile or residence. In such proceedings, the court will act without charge and out of turn.

VI. Miscellaneous provisions

Data transmission

The Data Controller may transfer personal data only under the conditions and with the guarantees provided by law. In the event of a transfer, the Data Controller shall obtain the consent of the data subject in each case.

Data transfers to third countries

Our company does not currently transfer data to any other country in the European Union or outside the European Union, and we do not plan to do so, but we will do so if our intentions change,
we will inform you

Data security measures:

Our Company designs and implements its processing operations in a way that ensures the protection of your privacy in the application of the GDPR and other applicable laws on data processing.

The Data Controller shall ensure the security of the data and shall take the technical and organisational measures and establish the procedural rules necessary to enforce the provisions of the GDPR and other data protection rules.

The Data Controller shall protect the data by taking measures to safeguard against various risks, in particular, but not limited to, unauthorised access, alteration, disclosure, transmission, disclosure, erasure or destruction, accidental destruction or damage, and inaccessibility resulting from changes in the technology used. In this context, the Data Controller stores the personal data of the data subject in a password-protected and/or encrypted database. Our Company protects your personal data with firewalls, antivirus programs, encryption mechanisms, content filtering and other technical solutions in the framework of risk-proportionate protection, and monitors potential data

Inspira Research Ltd.

breaches on an ongoing basis . The completed questionnaires and any audio recordings are stored electronically by the Data Controller

Profiling

We do not profile your personal data and we do not intend to do so in the future, but we will inform you if we change our intention to do so.

Automated decision-making

We do not carry out automated decision-making activities with your personal data, nor do we intend to carry out such processing in the future, but we will inform you if we change our intention to do so

We trust that all your questions have been answered clearly and satisfactorily in our Guide. If you have any further questions, please feel free to contact us as set out in the Prospectus.

**Inspira Research Market Research and Consulting Limited Liability Company
1132 Budapest, Váci út 18.**