

Data processing information notice Procurement processes

Magyar Telekom Group - an accordance with Paragraph 1 herein and 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 (“**General Data Protection Regulation**”) hereby informs Data Subjects in regards of the processing of personal data as follows:

1. Company name and contact details of the data processor:

Magyar Telekom Plc. (registered seat: 1097 Budapest, Könyves Kálmán körút 36.; company registration number: 01 10 041928; taxpayer identification number: 10773381-2-44)
Procurement and Logistics Directorate
Telephone: (+36 1) 371-3518
Fax: (+36 1) 371-3418

In cases where procurement activities are pursued for and on behalf of T-Systems Hungary Private Limited Company (registered seat: 1097 Budapest, Könyves Kálmán körút 36.; company registration number: 01 10 044852; taxpayer identification number: 12928099-2-44) and KIBU Innovation Technical Research Development Services Non-profit Limited Liability Company (registered seat: 1092 Budapest, Ráday u 30.; company registration number: 01 09 061069; taxpayer identification number: 10222098-2-43) Magyar Telekom Plc. acts as the data processor of T-Systems Hungary Private Company Limited by Shares and KIBU Innovation Technical Research Development Services Non-profit Limited Liability Company in which case the aforementioned companies are the data controllers.

The data controller referred to in this Paragraph shall be hereinafter referred to as „**Data Controller**”.

2. Name and contact details of the Data Protection Officer:

dr. Attila Puskás (address: 1097 Budapest, Könyves Kálmán körút 36.; email: DPO@telekom.hu).

3. Scope of the processed personal data, legal basis, objective and duration of data processing:

Scope of the processed personal data	Legal basis for data processing	Objective of data processing	Data processing period
Non-natural person contracting partners: <ul style="list-style-type: none"> - e-mail address (if it may lead to draw conclusions on natural persons); - executive officer's (owner's) name, position, telephone number, e-mail address; - name, telephone number, e-mail address of the Data Controller (as a commercial contact person), the competent individual's name, position, telephone number, e-mail address; - name, e-mail address of the person performing or modifying registration; - name and address of the auditor (insofar the auditor is a natural person) name and address; 	Legitimate interest of the Data Controller, in accordance with Paragraph (1) f) of Article 6. of the General Data Protection Regulation, based on which the Controller prepares the relevant interest assessment test. The data subject has the right to object against data processing based on the Controller's legitimate interest. It is the Data Controller's legitimate and lawful interest to keep records on	Registration, making records on the Data Controller's Contractual partners.	Personal data - in accordance with the provisions of Act 2013. of V. on the Hungarian Civil Code (“ HCC ”) on the general limitation period - shall be deleted after the period of 5 years.

Scope of the processed personal data	Legal basis for data processing	Objective of data processing	Data processing period
<ul style="list-style-type: none"> - name of the subcontractor (insofar the subcontractor is a natural person). <p>Natural person or private entrepreneur contracting partner:</p> <ul style="list-style-type: none"> - name; - e-mail address; - language of communication with the Data Controller; - residential address / registered office (including the name of the country); - address where the addressee is available if such address is different from the residential address / registered office; - taxpayer identification number, EU taxpayer identification number / tax ID; - registration number if the person is a private entrepreneur; - D.U.N.S. (Data Universal Numbering System) number; - name of the subcontractor (insofar the subcontractor is a natural person); - telephone number;; - fax number; - PO box; - name of the bank where the account is held and the bank account number; - name, telephone number, e-mail address of the Data Controller (as a commercial contact person), the competent individual's name, position, telephone number, e-mail address; - name, e-mail address of the person performing or modifying registration data; - name and address of the auditor (insofar the auditor is a natural person) name and address; - name of the subcontractor (insofar the subcontractor is a natural person); - registration number of the quality management certificate; - registration number of the environment management and/or information security management and/or other certificate; - password used during registration. 	<p>its contractual partners to perform the relevant contractual duties as effectively as possible.</p> <p>These records serve as the basis of contact keeping with contractual partners and the provision of the necessary information to ensure the successful implementation of the relevant agreements.</p>		
Natural person data subjects, registering as natural persons on the interface maintained by	The Data Subject's consent based on Article 6.	Newsletters	Until the withdrawal of

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<p>the Data Controller's organizational unit responsible for procurement:</p> <ul style="list-style-type: none"> - name (last name and first name); - address; - telephone number; - e-mail address; - password used during registration. <p>Natural person or private entrepreneur contracting partner:</p> <ul style="list-style-type: none"> - name; - e-mail address. <p>Non-natural person contracting partner:</p> <ul style="list-style-type: none"> - e-mail address. 	<p>Paragraph (1) a) of the General Data Protection Regulation.</p> <p>The Data Subject may withdraw the consent at any time. The withdrawal of the consent is without prejudice to the legitimacy of consent-based data processing prior to the withdrawal.</p>		<p>the consent to data processing.</p>
<p>Non-natural person contracting partners:</p> <ul style="list-style-type: none"> - e-mail address (if it may lead to draw conclusions on natural persons); - executive officer's (owner's) name, position, telephone number, e-mail address; - name, telephone number, e-mail address of the Data Controller (as a commercial contact person), the competent individual's name, position, telephone number, e-mail address; - name, e-mail address of the person performing or modifying registration; - name and address of the auditor (insofar the auditor is a natural person) name and address; - name of the subcontractor (insofar the subcontractor is a natural person). <p>Natural person or private entrepreneur contracting partner:</p> <ul style="list-style-type: none"> - name; - e-mail address; - language of communication with the Data Controller; - residential address / registered office (including the name of the country); - address where the addressee is available if such address is different from the residential address / registered office; - taxpayer identification number, EU taxpayer identification number / tax ID; - registration number if the person is a private entrepreneur; - D.U.N.S. (Data Universal Numbering System) number; 	<p>Legitimate interest of the Data Controller, in accordance with Paragraph (1) f) of Article 6. of the General Data Protection Regulation, based on which the Controller prepares the relevant interest assessment test. The data subject has the right to object against data processing based on the Controller's legitimate interest.</p> <p>It is the Data Controller's legitimate and lawful interest to effectively keep contact with its contractual partners to successfully implement their effective agreements. It is the Data Controller's legitimate and lawful interest to be able to supply the necessary information to its contractual partners in relation to their existing agreements during the term thereof.</p>	<p>Contact keeping with the Data Controller's Contractual Partners to fulfill contractual duties, perform the legal transaction.</p>	<p>Personal data - in accordance with the provisions of the HCC on the general limitation period - shall be deleted after the period of 5 years.</p>

Scope of the processed personal data	Legal basis for data processing	Objective of data processing	Data processing period
<ul style="list-style-type: none"> - name of the subcontractor (insofar the subcontractor is a natural person); - telephone number; - fax number; - PO box; - name of the bank where the account is held and the bank account number; - name, telephone number, e-mail address of the Data Controller (as a commercial contact person), the competent individual's name, position, telephone number, e-mail address; - name, e-mail address of the person performing or modifying registration data; - name and address of the auditor (insofar the auditor is a natural person) name and address; - name of the subcontractor (insofar the subcontractor is a natural person); - registration number of the quality management certificate; - registration number of the environment management and/or information security management and/or other certificate; - password used during registration. 			
<p>Non-natural person contracting partners:</p> <ul style="list-style-type: none"> - executive officer's (owner's) name, position; - name of employees, performance agents engaged in other employment-related legal relationship or persons having business interest in the contractual partner who are employed by the Data Controller or any other member company of Magyar Telekom Group; - name of the subcontractor (insofar the subcontractor is a natural person); - name of owners, senior officers, representatives or employees authorized to make substantial statements or undertake legal obligations who are close relatives or have other personal relationship with the Data Controller or an employee of a Magyar Telekom Group's member company due to which the said person cannot reasonably be expected to act without bias; 	<p>Legitimate interest of the Data Controller, in accordance with Paragraph (1) f) of Article 6. of the General Data Protection Regulation, based on which the Controller prepares the relevant interest assessment test. The data subject has the right to object against data processing based on the Controller's legitimate interest.</p> <p>It is the Data Controller's legitimate and lawful interest to perform a sufficient and effective due diligence process on its potential contractual relations that may incur payment obligations for Magyar Telekom Group. It is the Data Controller's</p>	<p>Sufficient and effective due diligence of potential contractual relations that may incur payment obligations for Magyar Telekom Group - including the Data Controller.</p>	<p>Personal data - in accordance with the provisions of the HCC on the general limitation period - shall be deleted after the period of 5 years.</p>

Scope of the processed personal data	Legal basis for data processing	Objective of data processing	Data processing period
<ul style="list-style-type: none"> - publicly available personal data regarding the professional activities of the contractual partner, the owners thereof with the three biggest ownership share in the company and its senior officers, found with the use of a generally used search application as well as personal data processed by the Data Controller within the frame of a reference check; - name of owners, senior officers, representatives or employees authorized to make substantial statements or undertake legal obligations who were employed or retained in any other form of work engagement by the Data Controller or any Magyar Telekom Group member company in the past three years; <p>Natural person or private entrepreneur contracting partner:</p> <ul style="list-style-type: none"> - name; - registration number if the person is a private entrepreneur; - registration number of the quality management certificate; - name of the subcontractor (insofar the subcontractor is a natural person); - registration number of the environment management and/or information security management and/or other certificate; - name of representatives or employees authorized to make substantial statements or undertake legal obligations who are close relatives or have other personal relationship with the Data Controller or an employee of a Magyar Telekom Group member company due to which the said person cannot reasonably be expected to act without bias and the recording of this fact in respect of the said person; - publicly available personal data on the professional activities of the contractual partner found with the use of a generally used search application as well as personal data processed by the Data Controller within the frame of a reference check; - name of employees, performance agents engaged in other 	<p>legitimate and lawful interest to perform the due diligence of contractual relations with the institutionalization of the necessary preventive processes to be able to prevent accountability and investigations initiated on the basis of anticorruption and other relevant laws. It is the Data Controller's legitimate and lawful interest to prevent the potential violation of law by way of its contractual relations, with the use or involvement of the Data Controller of any kind whatsoever. It is the Data Controller's legitimate and lawful interest to protect its reputation by way of ensuring its ability to avoid any situation where the public may have concerns that the Data Controller is involved in any unlawful activity or has business or any other relation with persons who are involved in any unlawful activity in any way.</p>		

Scope of the processed personal data	Legal basis for data processing	Objective of data processing	Data processing period
<p>employment-related legal relationship or persons having business interest in the contractual partner who are employed by the Data Controller or any other member company of Magyar Telekom Group and the recording of this fact in respect of the said person;</p> <ul style="list-style-type: none"> - the fact that the person himself/herself or any representative or employee (specifying the relevant name) authorized to make substantial statements or undertake legal obligations has been employed or retained in any other form of work engagement by the Data Controller or any Magyar Telekom Group member company in the past three years; 			
<p>Personal data that are necessary to make decisions on quotations within bidding and evaluation processes, in particular personal data sent by potential Contractual partners to the Data Controller in natural persons' Cvs who are planned to be involved in the fulfillment and performance of the transaction.</p>	<p>Legitimate interest of the Data Controller, in accordance with Paragraph (1) f) of Article 6. of the General Data Protection Regulation, based on which the Controller prepares the relevant interest assessment test. The data subject has the right to object against data processing performed on the basis of the Controller's legitimate interest.</p> <p>It is the Data Controller's legitimate and lawful interest to be able to make decisions on quotations submitted by contractual partners thereby ensuring that the Data Controller establishes the relevant legal relationship with the most suitable partner.</p>	<p>Making decisions on quotations within bidding processes with the objective to establish a legal relationship with the Data Controller's Contractual partners.</p>	<p>Personal data - in accordance with the provisions of the HCC on the general limitation period - shall be deleted after the period of 5 years.</p>

Upon registering into the interface maintained by the Data Controller's organizational unit responsible for procurement or upon supplying data by any other means the registering contractual partner, by way of supplying the personal data in question, declares that the content of this data processing information notice is duly made known to all natural persons whose personal data are processed for the purposes determined in this data processing information notice by way of making this notice available to the natural persons in question.

Upon registering into the interface maintained by the Data Controller's organizational unit responsible for procurement or upon supplying data by any other means the registering contractual partner, by way of supplying the personal data in question, declares that it is authorized to supply such personal data, based on an appropriate legal basis. The contractual partner shall be exclusively held responsible for the lawfulness of supplying the personal data to the Data Controller and no liability shall be attached to the Data Controller in this respect.

4. Automated decision-making (including profiling):

Within the frame of the data processing no automated decision-making - including profiling - takes place.

5. Forwarding of personal data, recipients and recipient categories:

Regarding data processors used within the data controlling activity, please see Paragraph 1 of this data controlling information notice.

Personal data are not transferred to 3rd countries (i.e. outside the European Union) nor to international organizations.

6. Rights of Data Subjects related to data controlling:

Data Subjects may request the Data Controller:

- a) to grant access to the Data Subject's personal data,
- b) to rectify the personal data, and
- c) to erase or restrict the processing of personal data - with the exception of mandatory data controlling.

Right to access:

The data subject is entitled to request information from the data controller whether the processing of his or her personal data is in progress. If such data processing is taking place the data subject is entitled to access the personal data. The Data Controller provides a copy of the personal data, being the subject matter of the data controlling, to the Data Subject. The Data Controller may charge a reasonable fee, based on the administrative costs, for any further copies requested by the Data Subject. Where the Data Subject submits the request electronically, unless the Data Subject requests otherwise, the information shall be provided in commonly used electronic format.

Right to rectification:

The Data Subject is entitled to request the Data Controller to correct his or her inaccurate personal data without undue delay.

Right to erasure:

The Data Subject is entitled to request the Data Controller to delete his or her personal data without undue delay and the Data Controller is obliged to delete Data Subject's personal data without delay in cases where:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to Paragraph (a) of Article 6 (1), or Paragraph (a) of Article 9 (2), and where there is no other legal ground for the processing;
- c) The data subject objects to processing of personal data concerning him or her based on Paragraph (1) of Article 21 of the General Data Protection Regulation and here is no compelling legitimate grounds for the processing which override the interests or the Data Subject objects to processing of personal data concerning him or her based on Paragraph (2) of Article 21;
- d) the personal data were processed in violation of the law;
- e) the personal data must be erased to fulfill the relevant legal requirements applicable in the European Union or the member state to the Data Controller;
- f) the personal data are collected in relation to offering information society services referred to in Paragraph (1) of Article 8 of the General Data Protection Regulation (conditions to obtain the consent of children).

Right to restriction of processing:

The Data Subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the data controller to verify the accuracy of the personal data;

- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to processing pursuant to Paragraph (1) of Article 21 of the General Data Protection Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

Right to data portability:

The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another data controller without hindrance from the controller to which the personal data have been provided, where: (i) the processing is based on consent pursuant to Paragraph (a) of Article 6 (1) of the General Data Protection Regulation or Paragraph (a) of Article 9 (2) or on a contract pursuant to Paragraph (b) of Article 6 (1); and (ii) the processing is carried out by automated means.

Right to object:

The Data Subject has the right, for reasons arising from his or her particular situation, to file an objection to the processing of personal data, where processing is performed in accordance with Paragraph (1) e) or f) of Article 6., including any profiling based on the aforementioned provisions. In such cases the data controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing purposes, which includes profiling insofar it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purpose.

General rules of exercising rights by the Data Subject

The Data Controller shall inform the Data Subject on the relevant measures taken as a response to the Data Subject's request without undue delay but no later than within one month upon receipt of the request. Where necessary and in consideration of the complexity and number of requests, this deadline can be extended with two more months. The Data Controller shall inform the Data Subject on the extension of the deadline within one month upon receipt of the request with specifying the reason thereof. If the Data Subject files the request electronically the information - insofar as possible - shall be provided electronically, too, unless the Data Subject requests otherwise.

The Data Controller shall provide the information and the measure to the Data Subject free of charge. If the Data Subject's request is clearly unsubstantiated or - in particular due to its repeated occurrence - excessive the Data Controller, in respect of the administrative costs arising from the provision of the requested information:

- a) may charge a reasonable fee, or
- b) may refuse to take the requested measure.

The burden of proof regarding the unsubstantiated or excessive nature of the request lies with the Data Controller.

If the Data Controller has well-founded doubts on the identity of the natural person filing such requests the Data Controller may request further information to verify the Data Subject's identity.

7. Enforcement of rights:

In respect of the processing of his or her personal data the Data Subject may at any time turn to the Data Controller's Data Protection Officer (dr. Attila Puskás (address: 1097 Budapest, Könyves Kálmán körút 36.; email: DPO@telekom.hu).

If the Data Subject's rights are violated the Data Subject may turn to the competent court and file an official complaint against the Data Processor. The court shall adopt a decision in priority proceedings. The burden of proof that the data processing complies with the relevant law lies with the Data Processor. The final decision on the case shall be made by the general court, in the capital by the Budapest-Capital Regional Court. The lawsuit can also be initiated before the general court operating at the Data Subject's permanent address or place of residence.

The Data Controller shall compensate for damages caused by the unlawful processing of the Data Subject's data or the breach of data security requirements. The Data Processor shall be relieved from liability if it is able to evidence that the damage is the result of an unavoidable cause beyond the scope of data processing. No compensation shall be paid, insofar

the damage was caused by intentional or material negligence on the part of the aggrieved party.

In the event that the Data Subject have complaints on the processing of his or her personal data the complaint can also be filed with the Hungarian National Authority for Data Protection and Freedom of Information and dr. Attila Péterfalvi, Chairman of the National Data Privacy and Freedom of Information Authority, postal address: 1530 Budapest, PO box: 5., address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, Telephone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; E-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).