



MINDFREEK PRODUCTIONS KFT.

PRIVACY POLICY

– effective date: September 1, 2023. –

I. Introduction, scope

The Mindfreak Productions Kft., as the data controller, is committed to complying with the applicable data protection regulations and maintaining the legality of data processing. This data processing policy complies with the provisions of the GDPR and includes the activities related to the data processed by the Data Controller in a simple and transparent manner. The scope of this policy extends to data transmission on the website operated by the Data Controller and the transfer of personal data to the Data Controller based on contracts or other legal transactions.

II. Conceptual definitions

Data Controller: The Mindfreak Productions Kft., whose detailed information can be found in Chapter III.

Processed Data: The collection and the entirety of data affected by data processing by the Data Controller.

Data Subject: The data subject is the natural person whose Personal Data is being processed by the Data Controller.

Personal Data: The data related to the identified or identifiable natural person ('Data Subject').

GDPR: The Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).

III. The Data Controller's information and contact details

Company name: Mindfreak Productions Kft.

Registered office: Erdősor road 6, 7th floor 46, Budapest, H-1046, Hungary

Company registration number: 01-09-955646

Registry authority: Company Court of Budapest Metropolitan Court

Email: office@mindfreak.hu

Representative of the Data Controller: Makrai Balázs

IV. The legal basis and rules of data processing

1. The Data Controller may provide Personal Data to the Data Subject through websites operated by the Data Controller or based on a contract established verbally or in writing between the Data Controller and the Data Subject. The Data Controller's data processing activities are carried out in accordance with the rules and principles defined by the GDPR, with special attention to Article 32 of the GDPR. The retention period for data processing is, in all cases, 5 (five) years from the transfer of Personal Data or the fulfillment of the contractual obligations.
2. The website operated by the Data Controller is the following:
www.mindfreek.hu
3. On the website operated by the Data Controller, there is no possibility to provide Personal Data, considering that it does not contain any form or other technical solution intended for data entry for the purpose of contact.
4. The Data Subject can provide the following Personal Data to the Data Controller through contracts or other documents:
 - a) name;
 - b) name at birth;
 - c) mother's name;
 - d) place and date of birth;
 - e) address, mailing address.

By signing the documents referred to in this section, the Data Subject consents to the Data Controller processing their Personal Data for the purposes stated in the document (voluntary consent to data processing). The Data Controller informs the Data Subject that the processed data will be used solely for the proper fulfillment of the contract and for the Data Controller's legitimate interests. The Data Controller informs the Data Subject, in accordance with Article 7 of the GDPR, that the consent for data processing can be withdrawn in writing at any time. However, the data processing prior to the withdrawal remains lawful.

5. The Data Controller's IT systems are located at its registered office. The Data Controller protects the Processed data with the expected appropriate measures, primarily against unauthorized access, alteration, transmission, disclosure, deletion, destruction, and becoming inaccessible. Considering the state of the art, the Data Controller ensures the effective protection of data processing with technical measures that provide a level of protection corresponding to the risks associated with data processing. During data processing, only authorized personnel have access to the Processed Data, and the Data Controller is continually available to fulfill the needs of the Data Subject.

6. The Data Controller does not process special categories of data, particularly data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or data concerning health or sex life.
7. The Data Controller does not transfer the Processed Data to third countries and does not use automated decision-making.

V. The rights related to data processing

The Data Controller informs the Data Subject that the following rights apply regarding data processing:

1. Right to access. The Data Subject is entitled to receive feedback from the Data Controller regarding whether the processing of their Personal Data is in progress, and if such data processing is in progress, they have the right to be informed about the Processed data and the further circumstances of data processing as defined in Article 15(1) of the GDPR.
2. Right to rectification. The Data Subject is entitled to request the Data Controller to rectify inaccurately processed Personal Data without undue delay. Taking into account the purpose of the data processing, the Data Subject is entitled to request the completion of incomplete Processed Data, including by means of providing a supplementary statement.
3. Right to erasure (right to be forgotten). The Data Subject is entitled to request the Data Controller to erase the Processed data concerning them without undue delay, and the Data Controller is obliged to erase the Processed data concerning the Data Subject without undue delay if the Processed data are no longer necessary for the purposes they were collected for, the Data Subject withdraws their consent to the data processing, or the data processing was unlawful.
4. Right to restriction of processing. The Data Subject is entitled to request the Data Controller to restrict the data processing if any of the following conditions is met:
 - a) The Data Subject contests the accuracy of the Processed Data, in which case the restriction applies for a period allowing the Data Controller to verify the accuracy of the data;
 - b) The data processing is unlawful, and the Data Subject opposes the erasure of the Processed Data and instead requests the restriction of their use;
 - c) The Data Controller no longer needs the Processed Data for the purposes of data processing, but the Data Subject requires them for the submission, enforcement, or defense of legal claims.
5. Right to data portability. The Data Subject is entitled to receive the Processed data concerning them, which they have provided to the Data Controller, in a structured, commonly used, and machine-readable format. Furthermore, the Data Subject has

the right to transmit these data to another Data Controller without hindrance from the Data Controller.

VI. The contact information of the Authority and information on legal remedies

The Data Controller informs the Data Subject that with any complaint related to data processing, they may turn to the following authority:

The National Authority for Data Protection and Freedom of Information (NAIH)

Address: 22/C Szilágyi Erzsébet fasor, Budapest, H-1125, Hungary

Postal address: 1530 Budapest, Pf. 5.

Phone: +36 1 391 1400

Email: ugyfelszolgalat@naih.hu

VII. Current laws and regulations

The laws and regulations regulating the subject matter:

- GDPR
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information

The Data Controller provides further information regarding data processing at the contact details found in Chapter III of this policy. Additionally, any declarations related to data processing should be sent to this contact address.

Budapest, September 1, 2023.

Mindfreek Productions Kft.