

GDPR DATA PROTECTION AND DATA MANAGEMENT POLICY

1. Introduction

1.1 Purpose of the Data Protection Notice

The purpose of this Data Protection and Data Management Policy (hereinafter: the "Notice") is to provide transparent and detailed information on how Zenith Vanguard Limited Liability Company (hereinafter: the "Data Controller") processes personal data during its activities, and to inform data subjects of their rights and the way such rights may be exercised.

1.2 Legal Compliance

This Notice has been prepared in accordance with the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR)
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.)

The Data Controller strives to ensure full compliance with the above legal requirements.

2. Data Controller Details

2.1 Identification and Contact Information

- **Company name:** Zenith Vanguard Limited Liability Company
- **Registered office:** 1031 Budapest, Saroglya utca 67
- **Company registration number:** 0109424480
- **Tax number:** 32445417-2-41
- **Legal representative:** Dr. Máté András Kertész
- **E-mail address:** mate@zenithvanguard.com

2.2 Data Protection Officer

The Data Controller has not appointed a Data Protection Officer, as its data processing activities do not fall within the scope of Article 37 of the GDPR.

Data protection-related inquiries may be submitted using the contact details listed above.

3. Definitions

3.1 Key GDPR Concepts

- **Personal data:** any information relating to an identified or identifiable natural person (“data subject”).
- **Data subject:** any identified or identifiable natural person to whom personal data relate.
- **Data controller:** the natural or legal person who determines the purposes and means of the processing of personal data.
- **Data processor:** the natural or legal person who processes personal data on behalf of the Data Controller.
- **Consent:** any freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which they signify agreement to the processing of personal data.

3.2 Personal Data Breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored, or otherwise processed.

4. Principles of Data Processing

4.1 Legal Bases and Principles

The Data Controller processes personal data in accordance with the GDPR and applies the following principles:

- **Lawfulness, fairness and transparency:** Personal data are processed only for specified and lawful purposes, in a transparent manner.
- **Purpose limitation:** Personal data are collected for specified, explicit purposes and are not further processed in a manner incompatible with those purposes.
- **Data minimisation:** Only personal data that are necessary for the purpose of the processing are collected and processed.
- **Accuracy:** The Data Controller takes reasonable steps to ensure that personal data are accurate and, where necessary, kept up to date.
- **Storage limitation:** Personal data are stored only for as long as necessary to achieve the purpose of the processing or to comply with legal obligations.
- **Integrity and confidentiality:** The Data Controller applies appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, loss, or destruction.

4.2 Accuracy and Security of Data

- Both the Data Controller and the data subject contribute to ensuring data accuracy; the data subject is requested to notify the Data Controller of any changes to their personal data.
 - The Data Controller takes reasonable measures to ensure the security of processed personal data and to protect them against unauthorised access.
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5. Purposes and Legal Bases of Data Processing

5.1 Website Operation

Purpose: ensuring the secure and proper operation of the website.

Legal basis: legitimate interest (Article 6(1)(f) GDPR).

Data processed: IP address, technical and security logs.

5.2 Contact via E-mail

Purpose: responding to inquiries and maintaining business communication.

Legal basis: legitimate interest (Article 6(1)(f) GDPR).

Data processed: name, e-mail address, message content.

5.3 Orders and Contract Performance

Purpose: processing orders, performing contracts, delivery and invoicing.

Legal basis: performance of a contract (Article 6(1)(b) GDPR).

Data processed: name, billing and delivery address, contact details, order data.

5.4 Issuance of Invoices

Purpose: compliance with accounting and tax obligations.

Legal basis: compliance with a legal obligation (Article 6(1)(c) GDPR).

Data processed: name or company name, address, tax number, invoice data.

5.5 Newsletter

The Data Controller does not currently operate a newsletter service and therefore does not process personal data for this purpose.

Should a newsletter service be introduced in the future; data processing will be based on prior consent and this Notice will be updated accordingly.

5.6 Use of Cookies

Purpose: ensuring website functionality and security.

Legal basis: legitimate interest (Article 6(1)(f) GDPR) for strictly necessary cookies.

The website does not use analytical or marketing cookies.

6. Data Processors and Data Transfers

The Data Controller uses an EU-based hosting service provider as a data processor for the technical operation and security of the website.

Personal data are processed exclusively within the European Union.

No personal data are transferred to third countries or international organisations.

7. Data Retention Periods

Personal data are retained as follows:

- **Contact e-mails:** for 1 year from the date of the last communication
- **Contract-related and invoicing data:** for 8 years in accordance with Hungarian accounting legislation
- **Technical and security logs:** retention period determined by the hosting service provider in accordance with its internal policies

Following the expiry of the applicable retention period, personal data are deleted or anonymised.

8. Rights of Data Subjects

Data subjects have the following rights:

- Right to access personal data
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to data portability
- Right to object to processing based on legitimate interest
- Right to lodge a complaint with a supervisory authority

Requests may be submitted using the contact details of the Data Controller.

9. Automated Decision-Making and Profiling

The Data Controller does not apply automated decision-making or profiling within the meaning of Article 22 of the GDPR.

10. Data Security Measures

The Data Controller applies appropriate technical and organisational measures, including:

- access control systems
 - regular backups
 - firewall and malware protection
 - secure storage of paper-based documents
 - data protection awareness for personnel
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11. Handling of Personal Data Breaches

In the event of a personal data breach, the Data Controller:

- notifies the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) within 72 hours where required.

- informs affected data subjects without undue delay where the breach is likely to result in a high risk to their rights and freedoms.
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12. Enforcement of Rights

12.1 Supervisory Authority

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

Address: 1055 Budapest, Falk Miksa utca 9–11

Phone: +36 (1) 391-1400

E-mail: ugyfelszolgalat@naih.hu

12.2 Judicial Remedy

Data subjects may initiate court proceedings before the competent court based on their place of residence or stay.

13. Applicable Legislation

- Regulation (EU) 2016/679 (GDPR)
- Act CXII of 2011
- Act C of 2000 on Accounting
- Act V of 2013 on the Civil Code

14. Use of Cookies

14.1 Purpose of Cookies

The Data Controller uses cookies on its website to ensure the proper and secure operation of the website and to provide a basic user experience.

Cookies are small text files placed on the user's device by the website and are used to enable essential website functions.

14.2 Types of Cookies Used

The website uses **only strictly necessary cookies**, which are essential for:

- the technical operation of the website,
- ensuring website security,
- enabling basic functionality.

The Data Controller **does not use**:

- analytical cookies (e.g. Google Analytics),
- marketing or advertising cookies,
- profiling or tracking cookies.

14.3 Legal Basis for Cookie Use

The legal basis for the use of strictly necessary cookies is the Data Controller's **legitimate interest** pursuant to Article 6(1)(f) of the GDPR, as these cookies are indispensable for the operation and security of the website.

The use of such cookies does **not require the prior consent** of the user.

14.4 Cookie Settings and Control

Users may manage or delete cookies through their browser settings at any time.
Please note that disabling cookies may affect the proper functioning of certain parts of the website.

A basic cookie information banner is displayed upon the user's first visit to the website.

14.5 Changes to Cookie Use

If the Data Controller introduces additional types of cookies in the future (such as analytical or marketing cookies), the website will request the user's prior consent and this Notice will be updated accordingly.

15. Final Provisions

15.1 Entry into Force and Amendments

This Notice is effective as of **1 January 2026**.

The Data Controller may amend this Notice in the event of legal changes or modifications to data processing activities. In the case of material changes affecting the purpose or legal basis of data processing, data subjects will be informed separately and, where required by law, their consent will be obtained.

Budapest, 1 January 2026



Zenith Vanguard Ltd.
Dr. Máté András Kertész
Managing Director