

PRIVACY NOTICE

For Customers and Prospective Customers of DUNAWATT Ltd. Regarding its Energy Products and Services

Effective: From November 1, 2023, until revoked

Dear Customer, Prospective Customer,

We appreciate your interest in our company and the energy products and services we offer.

The purpose of this document is to provide information about the data processing activities, rules, and principles of data protection and data management conducted by DUNAWATT Ltd.

DUNAWATT Ltd. places a high priority on the protection of personal data and ensures appropriate information regarding the storage, handling, and use of data.

It is important to emphasize that you are entitled to legally guaranteed rights and remedies during the data processing, detailed information about which can be found below. This notice pertains to data processing carried out by DUNAWATT Ltd. as the data controller. Please read the following information carefully!

If you have any questions, comments regarding data processing or data protection, or wish to exercise your rights related to data processing, please contact our internal data protection officer at the following contact details:

Márta Szabó
1037 Budapest, Zay st. 24.
E-mail: adatvedelem@dunawatt.hu

1.) WHAT DATA QUALIFIES AS PERSONAL DATA AND WHAT DOES DATA PROCESSING MEAN?

Personal data is any data or information that can directly or indirectly identify a specific individual, either independently or in combination with other data or information. Your personal data primarily includes your name, address, place, and date of birth, mother's name, and identification document numbers - these are the so-called identifying data. However, any other data that, in conjunction with any of the aforementioned data, can identify you, is also considered personal data. For example, data about your energy device can also be considered personal data.

Data processing refers to any operation performed on personal data, such as collecting, storing, using, organizing, transferring, modifying, linking with other data, deleting, or destroying the data.

2.) WHO PROCESSES YOUR DATA?

A) DATA CONTROLLER The organizations that perform data processing activities in connection with the energy sector are:

DUNA AUTÓ Commercial and Service Private Limited Company

Headquarters: 1037 Budapest, Zay Street 24.

Phone Number: +36-1-801-4203,

Email: info@dunaauto.hu

JP InterKontakt Asset Management and Service Limited Liability Company

Headquarters: 1037 Budapest, Zay Street 24.

Phone Number: +36-1-801-4203

Email: info@dunaauto.hu

BlazeArts Kft. - Forpsi

Headquarters: 1096 Budapest, Thaly Kálmán Street 39.

Phone Number: +36 1 610 5506,

Email: info@forpsi.hu

Web: www.forpsi.hu

Additional data controller, who qualifies as a joint data controller with DUNAWATT Ltd.:

Autóváros Commercial and Logistics Limited Liability Company

Headquarters: 2011 Budakalász, Kék Duna Street 4.

Phone Number: +36-1-801-4203

Email: info@autovaros.hu

JOINT DATA CONTROLLERS

If the purposes and means of data processing are determined jointly by two or more data controllers, they qualify as joint data controllers (hereinafter referred to as "Joint Data Controllers"). The Joint Data Controllers define their respective responsibilities transparently in an agreement made between them, in accordance with data protection laws, especially concerning the exercise of your rights and the provision of information, except in cases where the division of responsibilities among the data controllers is determined by applicable Union or Member State law. Regardless of the terms of the agreement made between the Joint Data Controllers, you may exercise your rights under this Notice with respect to and against each data controller.

ESSENTIAL ELEMENTS OF THE AGREEMENT BETWEEN THE JOINT DATA CONTROLLERS

We inform you that the joint contact person for the Duna Autó Zrt. group and Autóváros Ltd. is:

Márta Szabó,
1037 Budapest, Zay Street 24.
E-mail: adatvedelem@dunawatt.hu

The Joint Data Controllers determine the division of their responsibilities for fulfilling their obligations under the GDPR in an agreement made between them. This section provides information about the essential elements of the agreement.

Ensuring Rights The Joint Data Controllers have jointly prepared this Privacy Notice and designated a joint contact person. The Joint Data Controllers jointly ensure the exercise of your rights, with the provision that if your request specifically pertains to the data processing of one data controller, that particular data controller will handle your request accordingly. Beyond the contact person, you can address any of the data controllers regarding your personal data requests according to the rights listed in this Notice. The Joint Data Controllers will cooperate with each other concerning your request in accordance with GDPR provisions.

Data Storage and Data Security The storage and security of data are jointly ensured by the Joint Data Controllers as detailed in Section 9 of this Notice, while the procedure prescribed for data processing incidents is described in Section 7.

Liability of Joint Data Controllers The Joint Data Controllers are liable for damages caused by breaches of the provisions set forth in the GDPR. The Joint Data Controllers are exempt from liability if they can prove that they are in no way responsible for the event causing the damage, or if they can prove that the damage or infringement of your personal rights was caused by an unavoidable event outside the scope of data processing.

Damages do not need to be compensated, and no compensation for injury can be claimed to the extent that the damage or infringement of personal rights was caused by your intentional or grossly negligent conduct. Our liability towards you, as Joint Data Controllers, is joint and several, meaning you can enforce your claim against any of us, and any fulfillment by one data controller reduces the obligation of the other controllers to the extent fulfilled. The liability between the controllers is proportionate to their degree of responsibility; if this cannot be determined, then it is equal. In the further sections of this Notice, the term "Data Controller" also refers to Joint Data Controllers.

B) DATA PROCESSOR The Data Controller, its employees, and the data processors engaged by the Data Controller are entitled to access your personal data in accordance with applicable laws.

The data processing is performed by the following data processors on behalf of the Data Controller:

Hungarian Post

By mail: Customer Service Directorate, 3512 Miskolc By fax: +36-46-320-136 By email: ugyfelszolgalat@posta.hu By phone: +36-1-767-8282 (providing your name and address) In person: Magyar Posta Zrt., X. district, Üllői út 114-116. Purpose of data processing: delivery of mail Data processing activity: postal service Scope of data transferred: name, address Data retention period: Personal data is processed until the end of the calendar year following the receipt of the mail, unless the Postal Act specifies a different period, or the person using the service or the recipient of the postal item provides otherwise.

For example, if an affected individual sends a registered mail with a return receipt on October 8, 2021, the data related to the mailing and delivery of the letter will generally be processed by Magyar Posta Zrt. until December 31, 2022. However, the sender or the recipient may request that their data be processed for a longer period. If the processing of the data is necessary for the submission, enforcement, or defense of any legal claim related to the service (e.g., legal proceedings), Magyar Posta Zrt. will process the data for the period necessary to submit, enforce, or defend legal claims.

Hellmann Worldwide Logistics CEP Ltd.

Mailing address: 2046 Törökbálint, Hosszúrét hrsz 062 (P.O. Box 48) Phone numbers: +36 20 933 9999, +36 20 955 9999, +36 20 977 9999 Email: info@innight.hu Purpose of data processing: delivery of mail Scope of data transferred: name, address Data retention period: 1 month

HARAVILL Ltd.

Mailing address: 2000 Szentendre, Diófa Street 4/1 Phone: +36 20 320 8315 Email: haraszti.gabor@digikabel.hu Purpose of data processing: on-site installation of purchased equipment Scope of data transferred: name, address Data retention period: 1 month

Color and Code Ltd.

Mailing address: 1066 Budapest, Nyugati tér 1-2. Company registration number: 01-09-410651 Phone: +36 30 682 2367 Email: hello@kosarertek.hu Purpose of data processing: development and configuration of the <https://www.dunawatt.hu/> website Data processing activity: ensuring the operation of the website Scope of data transferred: access to the data you provide; in the case of a quote request, name, phone number, email address; no data is stored in any form.

C) DATA TRANSFER (to another data controller)

Payment Service Provider

When you order an electric car charger on the webshop at <https://www.dunawatt.hu/>, our site redirects you to the web interface of a payment service provider. Please note that the payment service provider is considered the data controller for the data provided on its web interface during the payment of the "Purchase Price" and "Shipping Fee".

- **Global Payments Europe s.r.o.** Mailing address: V. Olsinach 80/626, 100 00 Prague, Czech Republic Email: info@gpe.cz
Web: www.globalpaymentsinc.com Phone: +420 267 197 111 Hungarian Branch: **Global Payments Europe s.r.o. Hungarian Branch Mailing**
address: 1117 Budapest, Október huszonharmadika utca 8-10.
Email: info@globalpay.hu
Web: www.globalpay.hu
Phone: +36 1 324 2248
DPO: dpo@gpe.cz

Access by the Data Controller: For 30 days from the time of the transaction, we have access to the following data: the first 4 and last 4 digits of your bank card, the transaction code, the time of payment, and the amount, in order to manage refunds during the refund period.

We can check completed transactions up to 1 year retrospectively on the interface provided by the financial service provider.

Access by the Payment Service Provider: When making a payment by bank card, the payment service provider's web interface records the following data: name, bank card number, expiration date, CVV code, and amount for the purpose of completing the bank card payment transaction. The financial service provider has access to this data, but we do not.

"Chargeback" Function: If you notify your bank that you do not authorize a bank card payment (e.g., your card was stolen), your bank will contact the payment service provider, who will request all data related to the bank card payment from us.

Data Transfer in General: In the absence of an explicit legal provision, the Data Controller will only transfer personal data suitable for personal identification to third parties with your explicit consent. Some of the recipients of personal data (data processors) and the further data processors involved by them may be located or operate in countries outside Hungary and the EU, such as the People's Republic of China, where data protection laws provide a different level of protection compared to the jurisdiction of your country and which are not covered by an adequacy decision of the European Commission. For data transfers to such recipients, we provide appropriate safeguards by entering into data

transfer agreements with the recipients based on standard contractual clauses (2010/87/EU and/or 2004/915/EC) or by taking other measures to ensure an adequate level of data protection.

Service and Warranty Data Processing

At the request of the current owner of a specific energy device, and upon proof of ownership, we may provide the technical information stored for service and warranty data processing purposes related to the device. In such data requests, only technical information related to the device will be disclosed, and we are not in a position to disclose personal data related to previous owners or other individuals.

3.) WHAT LEGAL FRAMEWORK DO WE FOLLOW?

In its data processing activities, DUNAWATT Ltd. strives to adhere to the principles of lawfulness, purpose limitation, data minimization, accuracy, limited storage duration, and fair and transparent data processing. Accordingly, our data processing practices are designed in compliance with the applicable laws and regulations, with particular attention to: 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 (GDPR), as well as Act CXII of 2011 on the right to informational self-determination and freedom of information.

DUNAWATT Ltd. has entered into separate agreements with all its partners involved in data processing, wherein the parties have committed to acting in accordance with the above principles, laws, and regulations during data processing. If you feel this is not being achieved, please notify our internal data protection officer so we can promptly investigate your complaint.

4.) WHERE IS YOUR DATA PROCESSED?

1037 Budapest, Zay Street 24.

5.) YOUR RIGHTS AND REMEDIES REGARDING DATA PROCESSING

Information and Access to Personal Data

Upon request sent to adatvedelem@dunawatt.hu or to DUNAWATT Ltd, 1037 Budapest, Zay Street 24, we will inform you whether we are processing your personal data, and if so, provide access to your personal data and the following information:

- The purpose(s) of data processing;
- The types and categories of personal data being processed;
- The legal basis and recipients of any data transfer involving your personal data;
- The planned duration of data processing;
- Your rights regarding the correction, deletion, and restriction of processing of personal data, as well as your right to object to the processing of personal data;
- The right to contact the Authority and the right to submit a complaint;
- The source of the data;
- The existence of automated decision-making, including profiling, and in such cases, meaningful information about the logic involved and the significance and expected consequences of such processing for you;
- The names, addresses, and activities related to data processing of the data processors.

A copy of the personal data subject to processing will be provided to you free of charge on one occasion. For additional copies, we will charge a reasonable fee based on administrative costs.

If your request is clearly unfounded or – particularly due to its repetitive nature – excessive, we will charge a reasonable fee based on the administrative costs of providing the requested information or communication or taking the requested action, or we may refuse to act on the request. The burden of proving the clearly unfounded or excessive nature of the request lies with us. If the request is submitted electronically, the information will be provided in a widely used electronic format unless you request otherwise.

We will provide information related to your request in an intelligible form within one month from the submission of the request at the latest (which can be extended by an additional two months if necessary, considering the complexity of the request and the number of requests received; we will inform you of any such extension within one month of receiving the request, along with the reasons for the delay). You can submit your access request to adatvedelem@dunawatt.hu or to DUNAWATT Ltd, 1037 Budapest, Zay Street 24.

If we have reasonable doubts about the identity of the natural person submitting the request, we may request additional information necessary to confirm your identity, without prejudice to Article 11 of the GDPR. According to Article 11 of the GDPR, if the purposes for which the data controller processes personal data do not or no longer require the identification of the data subject by the data controller, the data controller is not obliged to retain, acquire, or process additional information solely to identify the data subject to comply with the GDPR. In such cases, if the data controller can demonstrate that it is not in a position to identify the data subject, it will inform the data subject accordingly, if possible. In these cases, the provisions regarding the rights of the data subject do not apply unless the data subject provides additional information enabling their identification for the purpose of exercising their rights. The request may be refused if the data controller proves that it is unable to identify the data subject.

- a) **Rectification of Processed Data**
- b) You have the right to request the rectification of inaccurate personal data or the completion of incomplete data (by specifying the correct data) in consideration of the purpose of data processing. You can make this request by emailing adatvedelem@dunawatt.hu or by mailing DUNAWATT Ltd, 1037 Budapest, Zay Street 24, along with proof of your identity. We will carry out the rectification without undue delay and notify you in writing once it has been completed.
- c) **Deletion of Processed Data (Right to be Forgotten)**
- d) You can request the deletion of your personal data without undue delay by emailing adatvedelem@dunawatt.hu or by mailing DUNAWATT Ltd, 1037 Budapest, Zay Street 24. We are obliged to delete your personal data without undue delay if any of the following reasons apply: a) The personal data is no longer necessary for the purpose for which it was collected or otherwise processed; b) You withdraw your consent, and there is no other legal basis for the data processing; c) You object to the processing of your personal data; d) The personal data was processed unlawfully; e) The personal data must be deleted to comply with a legal obligation under Union or Member State law applicable to the Data Controller; f) The personal data was collected in relation to the offer of information society services to children based on consent.

If the data controller has made the personal data public and is obliged to delete it pursuant to the above, the data controller, taking into account the available technology and the cost of implementation, must take reasonable steps, including technical measures, to inform other data controllers processing the personal data that the data subject has requested the deletion of any links to, or copies or replications of, those personal data (right to be forgotten).

Personal data do not need to be deleted if the processing is necessary for:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation which requires processing by Union or Member State law to which the data controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- Reasons of public interest in the area of public health;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, where the right to deletion is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- The establishment, exercise, or defense of legal claims.

Restriction of Data Processing

You have the right to request the restriction of the processing of your personal data instead of correction or deletion by emailing adatvedelem@dunawatt.hu or mailing DUNAWATT Ltd, 1037 Budapest, Zay Street 24, if any of the following conditions are met:

- You contest the accuracy of the personal data, in which case the restriction applies for a period enabling us to verify the accuracy of the personal data;
- The processing is unlawful, and you oppose the deletion of the data and request the restriction of its use instead;
- We no longer need the personal data for processing purposes, but you require it for the establishment, exercise, or defense of legal claims; or
- You have objected to processing; in this case, the restriction applies pending the verification of whether our legitimate grounds override yours.

If processing is restricted, such personal data shall, with the exception of storage, only be processed with your 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 European Union or of a Member State.

The data subject who has obtained restriction of processing will be informed by us before the restriction is lifted.

Notification Obligation Related to the Rectification or Erasure of Personal Data or Restriction of Processing

We will inform all recipients to whom the personal data has been disclosed of any rectification, erasure, or restriction of processing, unless this proves impossible or involves disproportionate effort. Upon your request, we will inform you about these recipients by emailing adatvedelem@dunawatt.hu or writing to DUNAWATT Ltd, 1037 Budapest, Zay Street 24.

Right to Data Portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format, and you have the right to transmit those data to another controller without hindrance from us, where:

- a) The processing is based on consent or on a contract; and
- b) The processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible. Exercising this

right shall not adversely affect the rights and freedoms of others, and it does not infringe upon the right to erasure or the right to be forgotten.

The mentioned right does not apply if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The right to data portability shall not adversely affect the rights and freedoms of others.

Right to Object

You have the right to object to the processing of your personal data if the processing is:

- Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

In case of an objection submitted via email to adatvedelem@dunawatt.hu or by post to DUNAWATT Ltd, 1037 Budapest, Zay Street 24, we, as the Data Controller, will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

We will inform you without undue delay, but no later than within one month from the receipt of your request, about the actions taken on your request for access, rectification, erasure, restriction, objection, and data portability. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended by an additional two months.

We will inform you of any extension of the deadline, including the reasons for the delay, within one month of receiving your request. If you submitted your request electronically, we will provide the information electronically if possible, unless you request otherwise.

We inform you that if we do not take action on your request, we will inform you without delay, but no later than within one month from the receipt of your request, of the reasons for not taking action and of your right to lodge a complaint with a supervisory authority and to seek a judicial remedy.

Upon your request, the information, communication, and actions taken based on your request will be provided free of charge. If your request is clearly unfounded or excessive, particularly due to its repetitive nature, we may charge a reasonable fee based on administrative costs, or

refuse to act on the request. The burden of proving the clearly unfounded or excessive nature of the request lies with us.

Right to Judicial Remedy

In accordance with Section 23 of the Information Act (Infotv.), you have the right to bring an action before a court against the Data Controller or, in relation to processing operations falling within the scope of the Data Processor's activities, against the Data Processor if you believe that the Data Controller or the Data Processor acting on its behalf or at its direction processes your personal data in violation of the requirements set out in applicable data protection laws or binding legal acts of the European Union.

You may choose to bring the action before the court that has jurisdiction over your place of residence or stay. The action may also be brought by someone who otherwise does not have legal capacity to sue. The Authority may intervene in the action to support your claim.

Enforcement of Rights Related to Personal Data Following the Death of the Data Subject

Within five years after your death, the rights that you were entitled to during your lifetime, as specified in points b)-e) of Section 14 of the Information Act (Infotv.), or in the case of data processing operations under the GDPR, as specified in Articles 15-18 and 21 of the GDPR, can be enforced by a person authorized by you through an administrative disposition or a statement made in a public document or a private document with full probative value filed with the Data Controller. If you have made several such statements with the Data Controller, the statement made at the later date will be the guiding one.

If you have not made an appropriate legal declaration, your close relative, as defined by the Civil Code, will be entitled to exercise the rights specified in point c) of Section 14 of the Information Act, in the case of data processing operations under the GDPR, Articles 16 and 21 of the GDPR, and – if the data processing was unlawful during your lifetime or the purpose of data processing ceased with your death – the rights specified in points d) and e) of Section 14 of the Information Act, in the case of data processing operations under the GDPR, Articles 17 and 18 of the GDPR, within five years after your death. The close relative entitled to enforce your rights under this paragraph is the one who exercises this right first.

The person enforcing your rights is entitled to exercise these rights – in particular, against us (the Data Controller) and the authority, during proceedings before authorities or courts – with the rights and obligations established for you by the Information Act (Infotv.).

The person enforcing your rights must prove the fact and date of death with a death certificate or a court decision, and their own identity – and, if applicable, their close relative status – with a public document. Upon request, we will inform your close relative under the Civil Code of the actions taken based on the request, unless you have prohibited this in your statement.

Data Protection Impact Assessment

If a type of data processing – especially one using new technologies – is likely to result in a high risk to the rights and freedoms of natural persons, considering its nature, scope, context, and purposes, we will carry out an impact assessment prior to the data processing to evaluate how the intended data processing operations affect the protection of personal data. We may evaluate similar types of data processing operations that present similar high risks in a single impact assessment. As necessary, but at least in case of changes in the risks posed by data processing operations, we will conduct a review to assess whether the processing of personal data is in accordance with the data protection impact assessment.

6.) Data Security

We place great importance on ensuring the security of data. Our technical and organizational measures, and procedural rules are designed to ensure that the data collected, stored, and processed are protected, and prevent the destruction, unauthorized use, and unauthorized alteration of the data. Any third party to whom we transmit or transfer data based on your consent is required to meet the requirements of data security.

We ensure that unauthorized persons cannot access, disclose, transmit, modify, or delete the data we process. The processed data can only be accessed by us, our authorized employees, and the data processor(s) we employ. We do not disclose the data to any third party who is not authorized to access it.

We do everything possible to prevent the accidental damage or destruction of the data. This obligation is imposed on our employees participating in data processing activities.

You acknowledge and accept that if you provide your personal data on the Website, by email, or via web chat – despite the fact that the Data Controller has modern security tools to prevent unauthorized access or the discovery of data – the protection of data cannot be fully guaranteed on the Internet. In the event of unauthorized access or discovery of data despite our efforts, the Data Controller is not responsible for such data acquisition or unauthorized access or for any damage arising from these causes. Additionally, you may provide your personal data to third parties, who may use it for illegal purposes or in an unlawful manner.

From a data security perspective, it is important to log out from the website when using shared computers or public places after finishing your session. If you visit our site from your own computer, depending on the application, you may remain logged in for a certain period. In this case, also be cautious to ensure that strangers cannot access your computer and perform transactions on your behalf.

7.) Handling and Reporting of Data Protection Incidents

A data protection incident is any event that results in the unlawful processing or handling of personal data we process, transmit, store, or handle. This includes unauthorized or accidental

access, alteration, disclosure, deletion, loss, or destruction of personal data, as well as accidental destruction or damage.

We will report any data protection incident to the National Authority for Data Protection and Freedom of Information (NAIH) without undue delay, but no later than 72 hours after becoming aware of it, unless we can demonstrate that the incident is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification cannot be made within 72 hours, we will provide the required information in phases without undue delay, indicating the reasons for the delay. The notification to the NAIH will include at least the following information:

- The nature of the data protection incident, including the number and categories of affected individuals and personal data;
- The name and contact details of the Data Controller;
- The likely consequences of the data protection incident;
- The measures taken or proposed to be taken to address, mitigate, or remedy the data protection incident.

Within 72 hours of detecting the data protection incident, we will inform the affected individuals through our website <https://www.dunawatt.hu/>. Our notification will include at least the information specified in this section.

We maintain a record of data protection incidents for the purpose of monitoring measures related to the incident and informing the affected individuals. Our record includes the following information:

- The scope of the affected personal data;
- The scope and number of affected individuals;
- The date of the data protection incident;
- The circumstances and effects of the data protection incident;
- The measures taken to address the data protection incident.

We will retain the data in the record for 5 years from the detection of the data protection incident.

8.) Legal Remedies

We strive to ensure that the processing of personal data complies with legal requirements. If you feel that we have not met these requirements, please write to us at adatvedelem@dunawatt.hu or mail us at DUNAWATT Ltd, 1037 Budapest, Zay Street 24.

If you feel that we have violated your right to the protection of personal data, you may seek legal remedy from the competent authorities according to the applicable laws:

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

1. Official Name: National Authority for Data Protection and Freedom of Information
2. Headquarters: 1055 Budapest, Falk Miksa Street 9-11.
3. Mailing Address: 1363 Budapest, P.O. Box 9.
4. Phone Number: +36 (1) 391-1400
5. Fax: +36 (1) 391-1410
6. Central Electronic Mail Address: ugyfelszolgalat@naih.hu
7. Website URL: <http://www.naih.hu>
8. Official Repository Address: Short Name: NAIH, KRID: 429616918
9. Customer Service Contact: National Authority for Data Protection and Freedom of Information Customer Service
10. Phone Number: +36 (1) 391-1400
11. Fax: +36 (1) 391-1410
12. Address: 1055 Budapest, Falk Miksa Street 9-11.
13. Mailing Address: 1363 Budapest, P.O. Box 9.
14. Online Administration Access: <https://online.naih.hu/EMS/Home>
15. Data Protection Officer of the Authority: Dr. Attila Kiss
16. Phone Contact: +36 (1) 391-1470
17. Electronic Mail Address: dpo@naih.hu

- **Court**, in accordance with the jurisdiction and competence rules of Act CXXX of 2016 on the Code of Civil Procedure, depending on the subject matter and value of the dispute, before the court of the defendant's seat, or based on Section 23(3) of the Information Act (Infotv.), you may also initiate the lawsuit before the court competent for your place of residence or stay.

For electronic advertisements, the National Media and Infocommunications Authority (NMHH) acts. Detailed regulations can be found in Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, and in Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services.

1.) WHAT DATA DO WE PROCESS?

	Case	Purpose	Legal Basis	Scope of Data Processed	Source of Data Processed	Duration of Data Processing	Notes
Request for Quote or Information	If you request a quote or information in any form (by phone, email, filling out an online form, or in person) regarding any product or service we distribute, we will process the data you provide during the request for the quote or information.	Informing you and answering your questions.	Preparation of the contract.	Name, phone number, email address	Data is collected directly from you.	Data is collected directly from you.	Unless you have consented to data processing of a different nature based on consent, the data will be stored for the duration necessary to handle the request for a quote or other inquiry, but no longer than 12 months.
Purchase, Warranty, and Guarantee	If you purchase an energy device from us in person or online at https://www.dunawatt.hu/ , we will process the data you provide in the sales contract and the data of the purchased device.	Fulfillment of the contract with you. ¹	Fulfillment of the contract. Compliance with legal obligations	Name, address, place and date of birth, mother's name, ID number, phone number, email address, and data of the purchased device. For online purchases, additional data: comments (if any)	Data is collected directly from you.	Data is collected directly from you.	Unless you have consented to data processing of a different nature based on consent, the data will be stored for the duration of the sales contract (including the period for exercising your rights in case of warranty services and defective performance), but no longer than 13 years.

¹ Act V of 2013 on the Civil Code Section 6:171

Decree 19/2014 (IV. 29.) of the Ministry of National Economy on the procedural rules for handling warranty and guarantee claims for goods sold within the framework of a contract between a consumer and a business

Government Decree 151/2003 (IX. 22.) on mandatory guarantees for certain durable consumer goods

Act C of 2000 Section 169

	Case	Purpose	Legal Basis	Scope of Data Processed	Source of managed data	Duration of Data Processing	Notes
							In the case of online purchases, during the payment process, the payment service provider qualifies as an independent data controller; the data controller of the provided data will be the payment service provider. Please refer to section 2.C.
Performing Service and Warranty Repairs	Data processing necessary for performing service and warranty tasks related to energy devices. You must provide your data to fulfill the warranty undertaken in the contract; without the data, we cannot enter into the contract.	Performing Service and Warranty Repairs	Fulfillment of the Contract Compliance with Legal Obligations 2	Name, email address, phone number, device identification number	The data is collected directly from you.	Service and warranty information (technical data) related to energy devices are not deleted due to our legal obligations and the vital interests of the current owner of the device.	If we cannot process your data for the purposes specified in this section, the service cannot perform the necessary maintenance and repair work on your device.

² 249/2004. (VIII. 27.) Korm. rendelet az egyes javító-karbantartó szolgáltatásokra vonatkozó kötelező jótállásról

	Case	Purpose	Legal Basis	Scope of Data Processed	Source of managed data	Duration of Data Processing	Notes
Calls to the Customer Service Landline Number	If you initiate a phone call to the customer service landline number.	To answer your questions quickly and efficiently.	Your consent.	Phone number, audio recording of the phone call.	The data is collected directly from you.	Audio recordings are stored for 90 days.	Data processor: Comnica Ltd. (providing the Call Center software). We receive the data from the data processor through the company's online interface.
Customer Satisfaction Survey	We may contact our customers to assess their satisfaction with our services.	Continuous improvement of our services, better assessment of customer needs.	Consent	Name, phone number, email address	The data is collected directly from you.	12 months from the date of contact.	
Complaint Handling	If you turn to our employees with a complaint, we record your data.	Handling the complaint.	Compliance with legal obligations. 3	Name, address, phone number, email address, details of the purchased device.	The data is collected directly from you.	For the duration of handling the complaint and until the claims arising from the complaint become time-barred.	After recording in the Complaint Book, all pages of the entry are removed and filed in such a way that your data does not accidentally fall into unauthorized hands.

3 Section 17/A of Act CLV of 1997 on Consumer Protection

	Case	Purpose	Legal Basis	Scope of Data Processed	Source of managed data	Duration of Data Processing	Notes
Profiling	<p>With your explicit and prior consent, DUNAWATT Ltd. may send you certain targeted communications based on profiling using the data available about you or lawfully obtained from other sources.</p> <p>The purpose of profiling is to develop offers that best match the usage habits and preferences of the data subject.</p> <p>The data subject may request further information at any time about the method of profiling, particularly regarding the data considered, the conclusions drawn from them, and the sources of the data.</p>	Developing and sending personalized offers	Consent.	<p>You determine the scope of the data to be processed; the more data you provide, the more personalized offers we can send you.</p> <p>Scope of processed data: e.g., name, email address, address, phone number, age, occupation, living conditions, marital status, type and model year of the energy device you own, energy device you are interested in, whether you plan to purchase a new device or replace an existing one, if so, within what timeframe, data related to your usage habits</p>	The data is collected directly from you.	Data will be stored until the withdrawal of consent for data processing.	Please note that you may only provide your personal data when completing the consent form for data processing. If you provide data other than your own, it is the data provider's responsibility to obtain the consent of the data subject. Only individuals who are 18 years of age or older are entitled to provide data in the consent declaration.
New product offers, promotions, newsletters	If you consent to the data processing by DUNAWATT Ltd. for the purpose of sending new products, services, promotions, newsletters, etc., your data will be processed separately for this purpose until the withdrawal of your consent for data processing.	Direct marketing by electronic and other means, sending information and newsletters	Consent.	Name, address, phone number, email address, details of the purchased device.	The data is collected directly from you.	Data will be stored until the withdrawal of consent for data processing.	

	Case	Purpose	Legal Basis	Scope of Data Processed	Source of managed data	Duration of Data Processing	Notes
Market Research	DUNAWATT Ltd. maintains the personal data of data subjects on lists that cannot be linked to data processed for direct marketing purposes, for those who have given their consent solely for the purpose of contact to understand consumer habits (market research)	Contact for the purpose of understanding consumer habits (market research)	Consent	Name, email address, phone number, address	The data is collected directly from you.	Data will be stored until the withdrawal of consent for data processing.	After market research, DUNAWATT Ltd. will immediately separate the name and address data of the data subject from the other data of the research and store them separately, in a way that excludes the identification of the data subject and the connection with their responses. The Duna Autó Zrt. group will only deviate from this separation with the explicit consent of the data subject.
Prize draw	In case of applying for a specific prize draw, DUNAWATT Ltd. processes the personal data specified in the game rules.	Conducting the draw and awarding the prizes	Consent	Name, email address, phone number, address	The data is collected directly from you.	Data requested and collected for the purpose of direct marketing are stored until the withdrawal of consent for data processing. In the absence of other valid data processing consent, the players' data will be deleted after the conclusion of the prize draw.	The data of the winners will be retained within the statute of limitations for potential claims related to the prizes, as well as for compliance with tax and gambling supervision laws, and will be deleted thereafter.

<p>Event</p>	<p>Taking promotional photos and videos at joint customer events organized by DUNAWATT Ltd. and/or Duna Autó Zrt.</p> <p>In the recordings, individuals are not presented individually but as part of a group; the depiction is not personal but shows an overall effect, and no individualization occurs.</p>	<p>Direct marketing with promotional recordings.</p>	<p>Legitimate interest</p>	<p>Photo, video recording</p>	<p>The data is collected directly from you.</p>	<p>Data will be stored until withdrawal. If you wish to have your stored data deleted, you can do so electronically at info@dunawatt.hu.</p>	
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II.) OTHER PROVISIONS

This Notice is governed by Hungarian law, particularly the provisions of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, as well as 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.

Budapest, October 31, 2023