

INFORMATION ON DATA PROCESSING CARRIED OUT BY THE OFFICE OF SHAREHOLDERS OF ZWACK UNICUM NYRT.

You are a shareholder of **Zwack Unicum Nyrt.** (seat: 1095 Budapest, Soroksári út 26.; company registration number: 01-10-042048; hereinafter referred to as the “**Company**”).

The Company hereby informs you as per the below of the processing of your personal data in connection with keeping the shareholders’ register and making you able to exercise your shareholder rights (including but not limited to right to vote and the right to dividend) as per the 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 (“**GDPR**”) in line with Article 13 of the GDPR and in case we have not been provided with your data directly by you, in line with Article 14 of the GDPR.

1. The legal basis for data processing, the personal data processed and the source of data:

1.1 The legal basis for data processing

Pursuant to Article 6 (1) c) of the GDPR, processing is lawful only if and to the extent that processing is necessary for compliance with a legal obligation to which the controller (the Company) is subject. In the present case the legal basis of data processing is Article 6 (1) c) of the GDPR, the performance of the obligation of the Company as the following:

a) according to Section 3:245 (1) of Act V of 2013 on the Civil Code („**Civil Code**”), the Company keeps a shareholders’ register in which it registers the data of the shareholder specified therein (the name and the home address or registered office of shareholders, or their proxy in the case of jointly owned shares, the name and home address or registered office of the joint representative, the number of shares or interim shares, and the percentage of control of shareholders for each series of shares). Furthermore, according to Section 3:274. (1) of the Civil Code, the Company prepares attendance lists on the shareholders present at its general meetings which shall contain the shareholders’ data defined therein, being substantially identical with the data figuring in the shareholders’ register (the name and home address or registered office of the shareholder or his representative, the quantity of his shares and the number of votes he has, and any changes during the general meeting in the persons of those present). According to Section 5:35 of the Civil Code, ownership claims shall not lapse;

b) to provide contact between you and the Company in order to make you able to practice your shareholder’s rights and to comply with your shareholder’s obligations (Sections 3:253-3:267 of the Civil Code);

c) to comply with the obligations according to the applicable taxation, accounting and bookkeeping regulations with respect to the shareholders regarding the payment of dividends (Article 6 (1) c); Sections 52, 79 of Act on the Rules of Taxation).

Pursuant to Article 6 (1) f) of the GDPR, processing should be lawful only if and to the extent that processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data:

d) in order to provide more efficient contact between you and the Company in order to make you able to practice your shareholder's rights and to comply with your shareholder's obligations (Sections 3:253-3:267 of the Civil Code), the Company registers you e-mail address and telephone number (if you object to the processing of your e-mail address and telephone number by the Company, thus the Company deletes your e-mail address and telephone number, you are going to be able to communicate with the Company in a more difficult way);and

e) since the Company is obliged to keep minutes on the General Meeting of the Company (Section 3:278 of the Civil Code) which contains personal data eventually, having regard to the fact that due to the length of the General Meeting, the actions can be recorded efficiently and track back that way. With respect to this data processing the Company measured the interests and found that the legitimate interests are more important than the interest of the affected parties to data protection. It is the legal obligation of the Company to record the actions of the General Meeting and its legitimate interest to comply with this obligation more efficiently, its essential interest to make the action of the General Meeting reconstructed.

1.2 The data processed

1.2.1 The Company in order to comply with its obligations specified in Sections 1.1 a)-c) processes your below data:

Personal data which is compulsory to be provided when entering into a legal relationship and without which such legal relationship cannot be concluded or performed: name, maiden name, place of birth, date of birth, mother's name, citizenship, identification document number, address, mailing / notification address, telephone number, e-mail address, bank account number, name of the bank, tax identification number, passport number, number of shares, the existence of the long-term investment agreement, personal and contact data of the proxy of the shareholder, personal and contact data of the representative of the shareholder, data in connection with exercising the voting rights, amount of the dividend and tax.

The Company proceeds during data processing in accordance with the provisions of GDPR, Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of

Information “**Information Act**”), the Civil Code and the applicable tax and accounting regulations.

1.2.2 The Company processes your provided e-mail address and telephone number for the purpose of connection specified in Section 1.1 d) above.

1.2.3 The Company processes the recording of your speech for the purpose of efficient compliance with its legal obligation Section 1.1 e) above.

1.3 The source of data and information on the fact whether the source of the data is publicly available

We received the below personal data of the data specified in Section 1.2 above from the legal entities below:

As part of the shareholder identification, the Company receives the data on the shareholders via a CD from KELER Zrt. provided by the banks maintaining the securities accounts.

These personal data include the following: name, tax identification number, citizenship, mother’s name, address, mailing / notification address, bank account number, name of the bank, identification card number, place of birth, date of birth, maiden name, passport number.

The above data has been provided to your bank maintaining the securities account by you as shareholder.

2. The people entitled to process the data and to be aware of the data

The Company acts as controller of your personal data as listed in Section 1.2 above.

The employees of the Office of the Shareholders and the HR Department, the executive employees and managing directors of the Company have access to the data.

According to Section 3:247 (1) of the Civil Code, any person can be entitled to review the shareholders’ register. The Company or the person who is mandated to keep the shareholders’ register (KELER) is obliged to provide such opportunity during working hours at its seat. Pursuant to Section 3:245 (1), the shareholders’ register contains the below personal data:

name of the shareholder, in case of jointly owned shares, the name of the representative, address or seat, the number of the shares or temporary shares of the shareholder per share series, the amount of the ownership interests.

3. The purpose of processing:

The Company processes your data specified in Section 1.2.1 for the purpose of:

- a) maintaining the shareholders' register and the general meetings' attendance lists, as well as the traceability of the respective ownership claims,
- b) to make the shareholder able to practice shareholder's rights and to comply with shareholder's obligations, and
- c) to comply with dividend payment and related tax obligations.

The process of the personal data as stated above is obligatory. Without providing such data you are not able to practise your shareholder rights and comply with your shareholder obligations.

The recording described in Section 1.2.3 above is processed by the Company for the purpose of preparation of the minutes and to reconstruct efficiently of what has been said.

4. The duration of processing:

The shareholder data to be registered in the shareholders' register as per Section 3:245 (1) of the Civil Code and in the general meetings' attendance lists as per Section 3:274 (1) of the Civil Code (i.e. the name and home address or registered office of the shareholder or his representative, the quantity of his shares and the number of votes he has, and any changes during the general meeting in the persons of those present) are processed by the Company without time limitation.

The Company processes your personal data specified in Section 1.2.1 above, but not to be registered in the shareholders' register and the general meetings' attendance lists for a maximum period of eight years within the date of the certificates which is justified by the accounting obligations of the Company and the obligation to keep such data specified by the applicable laws (Section 169 of Accounting Act). After the expiry of such term, the Company deletes the data immediately and without delay.

The Company processes your personal data specified in Section 1.2.2 above until you object to the data processing or request the deletion of your e-mail address and telephone number.

The Company processes the recordings specified in Section 1.2.3 for a maximum period of six months within the date of the General Meeting.

5. Storing of data and description of technical and organisational measures applied in order to maintain data safety:

Your personal data are stored at the Company's seat and your data are not transferred except for the cases specified in Section 6 below.

The Company applies all technical safety measures that can be reasonably expected to store the data in a safe way, not accessible to third parties.

6. Persons having access to data, data transfers:

The employees of the Office of the Shareholders and the HR Department, the executive employees and managing directors of the Company have access to the personal data specified in Section 1.2 above.

The personal data specified in Section 1.2.1 are transferred in order to achieve the purposes specified in Section 3 to the organisation maintaining the shareholders' register, the service providers maintaining the securities accounts, the service providers, legal representatives, accountants and auditors assisting regarding the preparation and implementation of the General Meeting.

Pursuant to the applicable regulations, we transfer the data to the authorities having jurisdiction (for instance the tax authority).

The Company does not transfer the personal data specified in Section 1.2.2.

The Company does not transfer the recordings specified in Section 1.2.3.

7. Your rights in connection with data processing:

In connection with data processing, you have the following rights:

a) **right of access (Article 15 GDPR):** You are entitled to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information contained herein.

Per your request, the Company provides a copy of the personal data undergoing processing. For any further copies you request, the Company may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless you request otherwise, the information will be provided in a commonly used electronic form.

b) **right to rectification (Article 16 GDPR):** You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) **right to erasure (Article 17 GDPR):** You have the right to obtain from the Company the erasure of personal data concerning you without undue delay and the Company shall have

the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject.

This clause c) is not applicable to the extent that processing is necessary (i) for compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject (thus, your objection has no impact on processing since the Company processes only such data the processing of which is necessary to fulfil the Company's obligations), or (ii) for the establishment, exercise or defence of legal claims.

d) right to restriction of processing (Article 18 GDPR): You have the right to obtain from the Company restriction of processing where one of the following applies:

- You contest the accuracy of the personal data, for a period enabling the Company to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims or
- You have objected to processing; in this case, restriction lasts until the verification whether the legitimate grounds of the Company override yours.

e) right to object (Article 21 GDPR): You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you set forth in Section 1.1 d)-e). In this case, the Company will no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Due to the fact that the making of the record is necessary for the fulfilment of the Company's legal obligations, your objection does not result in the termination of the processing (the making and processing of the record).

f) right to receive information on the above rights (Article 12 GDPR): the Company provides you with information on action taken on your request as per clauses a)-e) above without undue delay and in any event within one month of receipt of your request. The information is provided in a concise, transparent, intelligible and easily accessible form. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company informs you of any such extension within one month of receipt of the request, together with the reasons for the delay.

The information is given free of charge. Where your request is manifestly unfounded or excessive, in particular because of its repetitive character, the Company may either (i) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (ii) refuse to act on the request. The Company bears the burden of demonstrating the manifestly unfounded or excessive character of the request.

The Company will communicate any rectification or erasure of personal data or restriction of processing carried out (section b)-d)) to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company shall inform you about those recipients if you request it.

g) right to lodge a complaint (Article 77 GDPR): You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the GDPR. The complaint can be filed with the National Data Protection and Freedom of Information Authority (NAIH) (address: 1055 Budapest, Falk Miksa utca 9-11., 1374 Budapest p.o.b.603; telephone: +36 1 391 1400; fax: +36 1 391 1410; www.naih.hu; ugyfelszolgalat@naih.hu).

h) right to judicial remedy (Article 79 GDPR): You have the right to judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company can be brought before the courts of the Member State where the Company has an establishment. Such proceedings may be brought before the courts of the Member State where you have your habitual residence.

i) right to data portability (Article 20 GDPR): in case the processing is based point (b) of Article 6 (1) that is the performance of an agreement concluded with you, you have the right to receive your personal data which you provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. With respect to the exercise of shareholders rights and obligations, this right generally do not apply to you as in this legal relationship the main base for data processing is the performance of the legal obligation of the Company.

8. You may request information on the processing of your personal data via the channels and from the person below:

You may request further information in connection with the processing of your personal data from Mr. Balázs Szűcs, investment contact person via mail (1095 Budapest, Soroksári út 26.) or e-mail (reszvenyesiroda@zwackunicum.hu). Per your request, verbal information may

also be given in which case, minutes have to be taken. If you request verbal information (e.g. via phone), you are required to prove your identity towards the Company. If you wish to exercise your rights above, you have to contact Mr. Balázs Szűcs, investment contact person as well.

Dated: Budapest, October 1, 2020